

**Renewable Energy & Human Rights Benchmark 2025
Company Profile**

Company name	Energias de Portugal (EDP)
Sub-sector	Project developer
Overall score	33% weighted average

Section score	Weighting	For section
41%	20%	1. UNGP core indicators
13%	40%	2. Salient human rights risks
0%	10%	3.a Response to risk of exposure to forced labour
17%	10%	3.b Serious allegations
90%	20%	4. Low Carbon Transition Assessment

Please read the disclaimer at the end of this scorecard and refer to the full methodology when perusing this scorecard. The methodology as well as additional analysis can be found [here](#).

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2025 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

Detailed assessment

1. UNGP core indicators based on the CHRB methodology (20% of total)

A. Policy commitments and governance

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> Met: General HRs commitment: The Company states that it is 'committed to respecting and enforcing all internationally recognized human and labor rights'. [Human Rights Policy, 07/2021: edp.com] Met: Commitment to UNGPs: The Company states that human rights policy implementation is ensured through 'the adoption of operational procedures that include applying human and labor rights criteria when establishing investment partnerships, implementing a Due Diligence system ensuring the United Nations Guiding Principles on Business and Human Rights, as well as the OECD Guidelines for Multinational Enterprises'. [Human Rights Policy, 07/2021: edp.com]
A.2	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> Met: Commitment to ILO core principles: The Company states that its human rights commitment includes 'applying the ILO Declaration on Fundamental Principles and Rights at Work and related conventions and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy'. [Human Rights Policy, 07/2021: edp.com] Met: Expects business relationships to commit to ILO core principles: As Above. The supplier code includes requirements in each ILO core area as well as Protection of Occupational Health and Safety (Conventions 155 and 187, Protocol 2002). [Human Rights Policy, 07/2021: edp.com]
A.3	Commitment to remedy	1.5	The individual elements of the assessment are met or not as follows: <ul style="list-style-type: none"> Met: Commitment to remedy adverse HRs impacts: The Company states that its action principles for human and labour rights include 'avoid adverse impacts that may arise from business operations or relationships, ensuring remediation in the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>event of their occurrence and undertaking not to retaliate against accusations, and cooperating in initiatives that promote access to remediation through legitimate judicial or non-judicial mechanisms'. [Human Rights Policy, 07/2021: edp.com]</p> <ul style="list-style-type: none"> • Met: Expects business relationships to make this commitment: The Human Rights policy states that 'The EDP Group implements its strategic commitments to respect all internationally recognized human and labour rights, identified in article 6, through the application of the following action principles: e) avoid adverse impacts that may arise from business operations or relationships, ensuring remediation in the event of their occurrence and undertaking not to retaliate against accusations, and cooperating in initiatives that promote access to remediation through legitimate judicial or non-judicial mechanisms; h) Extend the same commitments to its business partnerships and suppliers, working towards to extend these same commitments to their supply chains and their partnerships.' [Human Rights Policy, 07/2021: edp.com] • Met: Commitment to collaborate with judicial or non-judicial mechanisms: As indicated above, the action principles in the human rights policy include 'cooperating in initiatives that promote access to remediation through legitimate judicial or non-judicial mechanisms'. [Human Rights Policy, 07/2021: edp.com] • Not Met: Commitment to work with business relationships on remedy: The Human Rights policy states that 'The EDP Group implements its strategic commitments to respect all internationally recognized human and labour rights, identified in article 6, through the application of the following action principles: i. Work with its partners and suppliers to mitigate adverse impacts that are directly linked to its operations, products, or services through its own mechanisms or through cooperation in the development of third-party non-judicial solutions'. However, this subindicator looks for a commitment to cooperate in remediation, while current evidence seems to refer to mitigation. [Human Rights Policy, 07/2021: edp.com]
A.4	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: The Company states that 'To ensure effective management of respect for Human and Labor Rights established in this Policy, the EDP Group: a. Establishes the Human Rights Working Committee, chaired by a director of the EBD, managed by the corporate director responsible for Human and Labor Rights, and made up of the corporate directors with assigned responsibilities in the area of this policy, that is, ethics, sustainability, compliance, legal, auditing, management and labour relations, procurement and supplier management, prevention and safety, risk, and stakeholder management.' However, the EBD refers to Executive Board of Directors, composed of CEO/CEP from different EDP business. It is not considered as a Supervisory board level responsibility. Evidence is in use for other indicators. [Human Rights Policy, 07/2021: edp.com] • Not Met: Describes HRs expertise of Board member: The Company states that 'To ensure effective management of respect for Human and Labor Rights established in this Policy, the EDP Group: a. Establishes the Human Rights Working Committee, chaired by a director of the EBD, managed by the corporate director responsible for Human and Labor Rights, and made up of the corporate directors with assigned responsibilities in the area of this policy, that is, ethics, sustainability, compliance, legal, auditing, management and labour relations, procurement and supplier management, prevention and safety, risk, and stakeholder management'. However, no explicit evidence found that the Company has a board level responsibility with human rights expertise to oversee human rights issues. Current evidence refers to executive level. [Human Rights Policy, 07/2021: edp.com] • Not Met: Board member/CEO signal importance of HRs in their communications • Not Met: CEO or board incentives
A.5	Responsible lobbying and political engagement fundamentals	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Publicly available policy statement(s) (or policy(ies)) setting out lobbying and political engagement approach.: The Interest Representation policy states that 'Covering important issues that affect EDP's activities and/or Stakeholders, Interests Representation comprises activities that are carried out with the aim of participating in the processes of forming public decisions, developing interactions with various institutions at national and international level, with a view to making known to the competent entities the legitimate interests of the Company and/or the sector, which EDP believes should be considered within the scope of the aforementioned processes of forming decisions. Interests Representation includes the following activities: a) Lobbying activity: Lobbying is a legal and regulated activity in some markets in which EDP is present, notably in the United States of America and with the European Union Institutions. As such, and considering only and exclusively these markets, this Policy considers as lobbying the activity

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			<p>developed by the In-house Lobbyists and Lobbyists, as defined above.' 'EDP undertakes to • Pursue its activity in strict compliance with the laws and regulations in force, together with the promotion of responsible action guided by the strictest standards of Transparency, Ethics and Integrity. EDP guarantees compliance with national and international legislation applicable to each entity in the EDP Group, as well as with this Policy and other internal regulations in force, and any acts and/or omissions that constitute a breach or infringement of such rules are not tolerated. Therefore, EDP promotes a conduct that complies with the legislation in force, that is honest, upright, professional and fair conduct, and requires that the companies that constitute the Group, their employees and third parties acting on their behalf guide their behaviour in accordance with this commitment.' 'The Lobbyist shall be duly registered and communicate to EDP of any change in its registration. Whenever acting on behalf of EDP or of a company to which this Policy applies, the Lobbyist shall inform the company concerned and guide its conduct in accordance with the principles set out in this Policy, as well as the other internal regulations in force, and always in compliance with the applicable legal framework. A Lobbyist may only conduct this activity if and when it is regulated by the jurisdiction in which it operates, namely with European Union Institutions and in the United States of America.' [Interest Representation Policy, 04/07/2023: Interest Representation Policy.pdf (edp.com)]</p> <ul style="list-style-type: none"> • Not Met: Monetary value of direct political contributions • Not Met: Monetary value of indirect political contributions: The Company reports that 'costs related to lobbying was EUR 6 million in 2023.' However, no further information found in regards to donations made indirectly by the organisation by country and by recipient/beneficiary, including its lobbying expenses. [2023 Integrated Annual Report, 2023: edp.com] • Met: Requirement for third-party lobbyists to comply with the Company's lobbying and political engagement policy (or policies): The Company states in Interest Representation Policy that 'EDP promotes a conduct that complies with the legislation in force, that is honest, upright, professional and fair conduct, and requires that the companies that constitute the Group, their employees and third parties acting on their behalf guide their behaviour in accordance with this commitment.' [Interest Representation Policy, 04/07/2023: Interest Representation Policy.pdf (edp.com)]

B. Embedding respect and human rights due diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Senior responsibility for HRs implementation and decision making: The Human Rights working committee described below is 'chaired by a director of the EBD [Executive Board of Directors]', managed by the corporate director responsible for Human and Labour Rights and made up of the corporate directors with assigned responsibilities in the area of this policy, that is, ethics, sustainability, compliance, legal, auditing, management and labor relations, procurement and supplier management, prevention and safety, risk and stakeholder management'. [Human Rights Policy, 07/2021: edp.com] • Not Met: Describes day-to-day responsibility for implementing HRs commitments: The duties of the Human Rights Working Committee are: 'a) Assess the Annual Report and the Improvement Plan, prepared by the Human and Labor Rights corporate director, submitting it to the EBD. b) Analyze impact assessment and due diligence procedures. c) Consider and contribute to the salient Human and Labor Rights Risk Map. d) Advice on the development of performance indicators and provide an opinion on external assessments related to Human and Labor Rights. e) Analyze negative occurrences relating to Human and Labor Rights and the measures taken. f) Consider matters submitted to it by the corporate director of Human and Labor Rights'. However, the committee is made up of corporate directors, so it is not clear how day-to-day responsibility for implementing commitments is allocated. [Human Rights Policy, 07/2021: edp.com] • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation in supply chain
B.2	Identifying human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes process of identifying risks in own operations: The Company states in its Human Rights Policy that its action principles include 'identify, prevent and monitor the risks related to human and labour rights that are salient in its sector of activity, developing and keeping a Human and Labor Rights Risk Map up to date.' The Company also states in its Integrated Report that 'the analysis of the risks related to the respect for human and labour rights is carried out by assessing the country risk, the local risk and the specific risk of each activity according to the

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			<p>nature of the project, informed by the sector's risk map.' The Company has listed up four main risks for negative impact on human rights including failure to follow ILO Conventions, accidents at work, unemployment, and negative impact on the land. However, no evidence found on the details of the process to identify potential human rights risks and impacts in its operations. [Human Rights Policy, 07/2021: edp.com] & [Integrated Annual Report 2022, 31/12/2023: edp.com]</p> <ul style="list-style-type: none"> • Met: Describes process for identifying risks in business relationships: The Company indicates that a 1st step is to due diligence to the activities, which is implemented before scouting suppliers to identify country, sector, industry and specific service or good risks. The 2nd step is to due diligence to each supplier. Scouted suppliers must pass the first due diligence layer and are directly assessed through questionnaires, sharing of evidence, and for salient risks, direct verification. The Company has the in-depth due diligence process, which applies to suppliers that are exposed to clearly identified risks. The system applied by EDP consists of 3 main filters, which guide the definition of mitigation measures and control procedures. The Company has also listed six layers of due diligence. For example, the mandatory DD2 advanced ESG assessment requires that supplier is assessment against an advanced questionnaire, specific to the risk of the procured activity. Evidence, face to face, and on-site verification is carried out. Criticality Matrix includes ethical, human and labour rights of the contracted activity. [Human and Labour Rights Report 2022, 07/2023: edp.com] • Not Met: Describes risk identification system incl. stakeholder consultation • Met: Describes how risk identification system is triggered by new circumstances: The Company states that 'Policy implementation in field activities is ensured through the adoption of operational procedures that include, in particular, b) Carrying out and publishing human rights impact assessments (HRIA) or environmental and social impact assessments (ESIA) covering human and labour rights, prepared by independent third parties, whenever substantial infrastructure projects or closures are undertaken, or when entering new businesses or geographies.' [Human Rights Policy, 07/2021: edp.com]
B.3	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Describes assessment process and discloses salient HRs risks: The Company states that human rights policy implementation includes 'carrying out and publishing human rights impact assessments (HRIA) or environmental and social impact assessments (ESIA) covering human and labor rights, prepared by independent third parties, whenever substantial infrastructure projects or closures are undertaken, or when entering new businesses or geographies'. The Integrated report indicates that 'the analysis of the risks related to the respect for human and labour rights is carried out by assessing the country risk, the local risk and the specific risk of each activity according to the nature of the project, informed by the sector's risk map'. its Human and Labour Rights Report, the Company listed up its Human and Labour Risk Maps, which display its country's ranks, based on the frequency and severity of registered by RepRisk, that are related to the alternative energy sector, ordered from high risk to low risk. [Human Rights Policy, 07/2021: edp.com] & [2023 Integrated Annual Report, 2023: edp.com] • Met: Describes how process applies to supply chain: See B.2.1. Company indicates that it conducts double due diligence for its supply chain. The 1st step is to due diligence to the activities, which is implemented before scouting suppliers to identify country, sector, industry and specific service or good risks. The 2nd step is to due diligence to each supplier. Scouted suppliers must pass the first due diligence layer and are directly assessed through questionnaires, sharing of evidence, and for salient risks, direct verification. The Company has the in-depth due diligence process, which applies to suppliers that are exposed to clearly identified risks. The system applied by EDP consists of 3 main filters, which guide the definition of mitigation measures and control procedures. The Company has also listed six layers of due diligence. For example, the mandatory DD2 advanced ESG assessment requires that supplier are assessed against an advanced questionnaire, specific to the risk of the procured activity. Evidence, face to face, and on-site verification is carried out. The ESG Criticality Matrix includes ethical, human and labour rights of the contracted activity. [2023 Integrated Annual Report, 2023: edp.com] • Not Met: Public disclosure of results of HRs risk assessment • Not Met: Describes how assessment involved affected stakeholders: The Company reports that some of its projects in Colombia are in Indigenous Reservations areas. The Company has local team to conduct prior consultation with Wayuu communities. Prior consultation is a mandatory process that must be carried out before the execution of a project that may affect their living conditions through a two-way dialogue with the communities. However, no evidence found

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			on how it involves affected stakeholders in general human right assessment processes, rather than an example for some projects in specific settings. [Human and Labour Rights Report 2022, 07/2023: edp.com]
B.4	Integrating and acting on human rights risks and impact assessments	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues: The Company states in its Human Rights Policy that its action principles include ‘avoid adverse impacts that may arise from business operations or relationships, ensuring remediation in the event of their occurrence and undertaking not to retaliate against accusations, and cooperating in initiatives that promote access to remediation through legitimate judicial or non-judicial mechanisms.’ However, no further evidence found on the details of system to prevent, mitigate and remediate its salient human rights issues. [Human Rights Policy, 07/2021: edp.com] • Not Met: Describes how global system applies to supply chain: The Company states that ‘The EDP Group implements its strategic commitments to respect all internationally recognized human and labor rights, identified in article 6, through the application of the following action principles: a) Identify, prevent, and monitor the risks related to human and labor rights that are salient in its sector of activity, developing and keeping a Human and Labor Rights Risk Map up to date. i) Work with its partners and suppliers to mitigate adverse impacts that are directly linked to its operations, products, or services through its own mechanisms or through cooperation in the development of third-party non-judicial solutions.’ However, no further evidence found on the description of the system to proactively prevent, mitigate, and remediate salient human rights issues in supply chain. [Sustainable Supply Chain Report 2022, 06/2023: edp.com] • Met: Example of actions decided on at least 1 salient HRs issue: The Company lists its action programmes directed at the most salient risks. For the risk failure to follow ILO Conventions, the Company has action programme such as extension of Due Diligence to Indirect Suppliers, the use of Solar Stewardship Initiative, and Bettercoal. For the risk accidents at work, the Company has Global PlayitSafe Programme. For unemployment, the Company has Just Transition Local Reinvestment Plans and for negative impact on the land, the Company has Local Community Development Programme. [Integrated Annual Report 2022, 31/12/2023: edp.com] • Not Met: Describes how stakeholders involved in decisions about actions taken
B.5	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions: The Company indicates that ‘On top of the due diligence measures in all its Business Units – including new projects and acquisitions, suppliers, contractors, joint ventures, agents, customers and employees – annually, the Group develops a transversal monitoring process aimed at verifying effective practices, assessing the degree of compliance with the principles and commitments assumed, particularly of the risks identified as most relevant, identifying new potential risks, developing the necessary corrective actions and taking new management decisions to change any procedures in need. This procedures assessment or monitoring process takes evidence from the ensemble of due diligences processes.’ However, no details found on how it does so (evaluate whether actions taken to face specific salient issues are effective). It is unclear what the method is to evaluate or what the monitoring process consists of. [Human and Labour Rights Report 2022, 07/2023: edp.com] • Not Met: Example of lessons learned from evaluation effectiveness of actions • Not Met: Involves stakeholders in evaluation effectiveness of actions
B.6	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Provides one example of comms with stakeholders: Regarding vulnerable communities, the Company states that ‘The construction of renewable farms and power infrastructures always have physical impact on territories and local populations. Local authorities, landowners or users, neighbors, environmental organizations, all shall express their opinion and be engaged in the project. In regions where communities use collective territory it is necessary to address additional issues, especially tackling impacts on vulnerable communities. Developing infrastructures in Indigenous peoples’ territories demands extended agreements to assure local shared development.’ The Company has listed two examples of vulnerable communities impacts in Brazil and Colombia. For example, some projects, including EDPR’s, are in Indigenous Reservations areas – territories of a collective nature in which projects can be developed through compensation agreed upon in prior consultations. Taking this into consideration, we have been in contact with the local communities since our entry in the Colombian market, working closely with them and participating in different initiatives in the country.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>However, no further information found on the specific human rights issues found and how this has been communicated [Integrated Annual Report 2022, 31/12/2023: edp.com]</p> <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and grievance mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The Company states in its Human Rights Policy that its action principles include ensuring the proper functioning of a system to report occurrences and make complaints, with a guarantee of confidentiality and non-retaliation. The Company has the Ethics Channel, which is 'accessible to all individuals, workers and citizens, and communities or organizations, that may be adversely impacted by the company or, irrespective of this, that wish to complain, denounce, clarify or expose any situation, i.e. those related to human and labour rights.' The Company also has Whistleblowing Management Regulation Speak Up stating that 'global and transversal channel and on the intranet at Speak Up, which can be used by stakeholders of any EDP Group company to report complaints about alleged violations of the EDP Code of Ethics, including topics such as: a) specific compliance obligations such as those laid down in Law 93 and Law 83; b) financial matters; c) situations that may constitute moral and/or sexual harassment.' [Human Rights Policy, 07/2021: edp.com] & [Whistleblowing Management Regulation Speak Up, 02/05/2023: edp.com] • Not Met: Grievance mechanism available in appropriate languages and workers made aware: The Company states that the Speak Up Channel is available in English, Portuguese, Spanish. However, no evidence found how the Company ensures its workers are made aware of it through specific communications or training. [Speak Up (website), N/A: edp.com] & [Human Rights Policy, 07/2021: edp.com] • Met: Describes how workers in supply chain access grievance mechanism: The Company states that 'We rigorously implement a transparency policy, giving a voice to anyone who encounters conduct they believe breaches ethical principles, legislative provisions or internal standards. To enable this reporting, we provide various "Speak up" channels, which strictly follow the legal requirements regarding whistle-blowing and are easily accessible to anyone wishing to use them.' It is assumed that its business relationships can also access to its Speak Up channels. [Speak Up (website), N/A: edp.com] • Met: Expects business relationships to convey expectation to their business relationships: The Company states that 'The EDP Group implements its strategic commitments to respect all internationally recognized human and labor rights, identified in article 6, through the application of the following action principles: Extend the same commitments to its business partnerships and suppliers, working towards to extend these same commitments to their supply chains and their partnerships.' [Human Rights Policy, 07/2021: edp.com]
C.2	Grievance mechanism(s) for external individuals and communities	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The Company states that its Ethical Channel is accessible to all individuals, workers and citizens, and communities or organizations. [Human Rights Policy, 07/2021: edp.com] • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware • Not Met: Describes how external individuals/communities access grievance mechanism: The Company states that 'We rigorously implement a transparency policy, giving a voice to anyone who encounters conduct they believe breaches ethical principles, legislative provisions or internal standards. To enable this reporting, we provide various "Speak up" channels, which strictly follow the legal requirements regarding whistle-blowing and are easily accessible to anyone wishing to use them.' However, this subindicator looks for evidence that suppliers' and other business relationships' external stakeholders and communities can file complaints in relation to their behaviour. [Speak Up (website), N/A: edp.com] • Not Met: Expects business relationships to convey expectation to their business relationships
C.3	Remedying adverse impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy

2. Salient human rights risks (40% of total)

D. Indigenous Peoples' and Affected Communities' Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.PD	Commitment to respect indigenous peoples' rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect indigenous peoples' rights with explicit reference to UN Declaration: The Company states that 'we must acknowledge the rights of ethnic minorities and indigenous peoples where appropriate'. Commitment must include own operations and value chain. The Company has provided comments from its Human Rights Policy that 'The Policy sets out for the EDP Group's sphere of activity its commitment to respect all internationally recognized human and labor rights, namely: Understanding the Indigenous and Tribal Peoples Convention, 1989 (No. 169)'. However, no evidence found the Company has a public commitment to respect indigenous peoples' rights explicitly referencing the UN Declaration on the Rights of Indigenous Peoples. [Code of Ethics, 2024: edp.com] & [Human Rights Policy, 07/2021: edp.com] • Not Met: Description of process for identifying indigenous persons and customary lands. • Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: The Company has provided comments that 'EDPR secured two 20-year contracts for the construction of two wind farms. The contracts refer to the Alpha (212 MW) and Beta (280 MW) onshore wind projects, which are currently being developed. Some projects, including EDPR's, are in Indigenous Reservations areas. EDPR is especially active in the region of La Guajira in which the Wayuu (an Indigenous American ethnic group) are present, and where we have a social local team of 7 people with previous specific experience in relations and prior consultation with Wayuu communities, complemented by a team of 20 contractors of which 18 are Wayuus, ensuring we have a close connection and understanding of the reality.' As stated, prior consultation is a fundamental right that ethnic groups in Colombia have in order to be able to decide on measures (legislative and administrative) or projects, works or activities that are going to be carried out within their territories, with the aim of protecting their cultural, social, and economic integrity, and guarantee the right to participation. It is a mandatory process that must be carried out before the execution of a project that may affect their living conditions through a two-way dialogue with the communities. Some commitments emerge from the prior consultation with the purpose of preventing, mitigating, correcting, or compensating the impacts generated by the project in the territories, which are determined through impact identification workshops.' The prior consultation is ongoing and the project is not completed yet. [Human and Labour Rights Report 2022, 07/2023: edp.com] • Not Met: Commitment to FPIC: The Company has 2023-2036 goals that the principles of free, prior, and informed consent and shared value are applied in all new projects impacting communities. However, no further information found and no evidence on the description of process for identifying indigenous persons and customary lands.
D.2.PD	Engagement with all affected communities	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Describes how local communities identified and engaged in the last two years: The Company states that 'some projects, including EDPR's, are in Indigenous Reservations areas - territories of a collective nature in which projects can be developed through compensation agreed upon in prior consultations. Taking this into consideration, we have been in contact with the local communities since our entry in the Colombian market, working closely with them and participating in different initiatives in the country.' The projects are expected to have several other benefits for the local communities, such as local job creation. However, no evidence found on the details of how it identifies and engages with affected stakeholders on a regular basis, including human rights issues. [Human and Labour Rights Report 2022, 07/2023: edp.com] • Not Met: Provides two examples of engagement with communities: The Company indicates its projects in Colombia, the Company is active in the region of La Guajira in which the Wayuu (an Indigenous American ethnic group) are present. The Company has a social local team of 7 people with previous specific experience in relations and prior consultation with Wayuu communities, complemented by a team of 20 contractors of which 18 are Wayuus, ensuring we have a close connection and understanding of the reality. The Company conducts prior consultation before the execution of a project that may affect their living conditions through a two-way dialogue with the communities. In its wind farm projects in Brazil, on 05/27/2022 EDPR successfully won the bid for two Power Purchase Agreements of 15 years in the Brazilian renewable energy auction (A-4 2022) to sell clean energy produced by 93 MW in a wind farm with 124 MW of total

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			<p>installed capacity. These wind farms are in the municipality of Pocinhos, in the state of Paraíba, and are scheduled to start construction in December 2023. The municipality of Pocinhos forms part of the region of Pólo da Serra da Borborema, comprising 15 municipalities in this mountainous region of the interior of the Northeast area of Brazil. Three municipalities of the Paraíba state fall within the Wind Power Generation and Transmission Lines of the Serra da Borborema Project. As a result of this diagnosis, the departments of Environment, Social and Public Affairs & Community Relations drew up an action plan to be executed throughout 2023, which included initiatives addressing education and improvement of school environment, cultural events throughout the year, sports events, etc. However, no information found on the details of engagement with communities in the Brazilian case. [Human and Labour Rights Report 2022, 07/2023: edp.com]</p> <ul style="list-style-type: none"> • Not Met: Examples of engagement refer to marginalised groups and provide additional detail • Not Met: The company meets B2.C, B3.D, B4.D and B.5.C
D.3.PD	Benefit and ownership sharing policy	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to identify benefit and ownership sharing • Not Met: Commitment includes right to decide own priorities for communities • Not Met: Disclosure of statistics for each project describing demographics of benefit/ownership sharing • Not Met: Disclosure how affected communities participated in decision-making
D.4.PD	Local wind & solar energy access, affordability	0.6667	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Actions taken to support access and affordability of renewable energy in the value chain: The Company states regarding its wind farms in Colombia, 'the projects are expected to have several other benefits for the local communities, such as local job creation (currently, 60% of the labour force is from the Department of La Guajira), and access to renewable electricity supply through "solar communities" in some areas. resulting from the agreements made with the communities and in our efforts to support their development, we committed to a budget of 66 billion COP (~15 million USD) for 30 years with the objective of increasing the quality of life of local communities and contribute to their continued socio-economic development.' [Human and Labour Rights Report 2022, 07/2023: edp.com] • Not Met: Public support for government policies addressing energy access • Not Met: Including a timebound actions plan and reporting targets

E. Land and resource rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
E.1.PD	Respect for land and natural resource tenure rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Policy commitment to respect land ownership/natural resources: The Company states in the Human Rights Policy that 'Policy implementation in field activities is ensured through the adoption of operational procedures that include, in particular: b) Carrying out and publishing human rights impact assessments (HRIA) or environmental and social impact assessments (ESIA) covering human and labour rights, prepared by independent third parties, whenever substantial infrastructure projects or closures are undertaken, or when entering new businesses or geographies'. However, no evidence found on a public commitment to respect land rights of legitimate tenure rights. [Human and Labour Rights Report 2022, 07/2023: edp.com] • Not Met: Identification of legitimate tenure rights holders • Not Met: Extends expectation to business relationships • Not Met: Steps taken to use leverage to resolve land rights issues or disclosure that no such issues arose
E.2.PD	Just and fair physical and economic displacement policy implementation including free, prior and informed consent	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to follow IFC PS 5 for physical and economic displacements • Not Met: Description of compensation for resettlement • Not Met: Publishes statistics on numbers affected by relocations (current and planned projects) • Not Met: Publishes regular reviews of living conditions after relocation OR description of approach to physical and economic displacement

Indicator Code	Indicator name	Score (out of 2)	Explanation
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F. Security and conflict-affected areas

Indicator Code	Indicator name	Score (out of 2)	Explanation
F.1.PD	Operating in or sourcing from conflict-affected areas	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Commitment to heightened HRDD in conflict affected areas: The Company states in its Human Right Policy that 'The obligation to apply conflict minerals regulations and ensure import minerals and metals come from responsible sources.' However, no evidence found explicit commitment to address the heightened human rights risks associated with operations in conflict-affected and/or high-risk areas, in line with the recommendations of the UN Working Group on business and human rights. [Human Rights Policy, 07/2021: edp.com] • Not Met: Steps taken to assess and mitigate these risks with conflict sensitive lens • Not Met: How stakeholders are involved in the process to mitigate risks
F.2.PD	Evidence of security provider human rights assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Description of implementation of security approach and example: The Company states in the Human Rights Policy that 'Policy implementation in field activities is ensured through the adoption of operational procedures that include, in particular: Applying requirements for assessment, contracting, training, auditing, and exclusion of suppliers regarding human and labour rights practices. Specially for supply chains that are internationally recognized as being at risk, suppliers shall be bound to the following obligations: - obligation to certify contractors that provides infrastructure security'. However, no evidence is found on how the Company implements its security approach and provides an example of it in its own operations. [Human and Labour Rights Policy, 2023: edp.com] • Not Met: Description of monitoring of business partners • Not Met: Local communities engaged in assessment of security • Not Met: Example of working with community on this issue

G. Responsible mineral sourcing

Indicator Code	Indicator name	Score (out of 2)	Explanation
G.1.PD	Responsible sourcing of minerals: arrangements with suppliers	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Statement on OECD Guidance aligned due diligence: The Company states that 'The EDP Group is committed to respecting and enforcing all internationally recognized human and labor rights, identified in article 6. This commitment means: c) Operate a human and labor rights management system that is active and present in all its activities, implementing the United Nations Guiding Principles on Business and Human Rights, the OECD Due Diligence Guidance for Responsible Business Conduct and the Directive of the European Parliament and of the Council on Corporate Due Diligence and Corporate Accountability.' However, this indicator is looking for a commitment to follow the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals. No evidence of this was found. [Human Rights Policy, 07/2021: edp.com] • Not Met: The policy explicitly covers all minerals: The Company states in its Human Rights Policy that 'Specially for supply chains that are internationally recognised as being at risk, suppliers shall be bound to the following obligations: Apply conflict minerals regulations and ensure import minerals and metals come from responsible sources; iii. Certify contractors that provides infrastructure security; iv. Apply a Human and Labour Rights Policy and a Due Diligence system implementing the United Nations Guiding Principles on Business and Human Rights, as well as the OECD Guidelines for Multinational Enterprises'. However, no evidence found on a policy for its business relationships to follow the OECD Guidance explicitly covering all minerals. [Human Rights Policy, 07/2021: edp.com] • Not Met: Policy expectations of suppliers • Not Met: Contractual requirement for smelters/refiners to follow OECD
G.2.PD	Responsible sourcing of minerals: mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Identification and mapping of suppliers • Not Met: Traceability system for mineral supply chain • Not Met: Discloses smelters/refiners that are most significant part of supply chain • Not Met: Suppliers in higher risk activities, geographies, products
G.3.PD	Responsible sourcing of minerals: risk identification in mineral supply chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Identification and prioritising of risks in supply chain • Not Met: Expectation on suppliers to disclose • Not Met: Processes cover minerals assessed as highest risk

H. Protection of human rights and environmental defenders

Indicator Code	Indicator name	Score (out of 2)	Explanation
H.1.PD	Commitment to respect the rights of human rights and environmental defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs • Not Met: Expectation on business partners in value chain to make this commitment • Not Met: Description of how working with HRDs as part of risk assessment and DD • Not Met: Description of how working with HRDs to create safe and enabling environment

I. Labour rights (incl. protection against forced labour)

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.1.PD	Health and safety	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: The Company describes the process(es) it has in place to identify its health and safety risks and impacts: The Company states that 'In order to prevent electrical accidents involving third parties not involved in the group's activity, EDP ensures that the risks associated with its facilities and equipment are identified and communicated.' However, it is not clear if this process applies to H&S risks overall or just for electrical related risks and incidents. [2023 Integrated Annual Report, 2023: edp.com] • Met: Discloses quantitative information on H&S in own operations (injury rate or lost days and fatalities) in last reporting period: The Company states that 'In EDP group, 177 work-related accidents with lost days, occurred out of all EDP employees and ESP, representing an increase of 33% compared with 2022. The frequency rate (FR) amongst EDP employees and ESP in 2023 grew 13% compared with the previous year, consequently we were unable to achieve the target of 1.64 set for 2023. During 2023, there were five fatal accidents at work with contractors (fall from height, electrical origin, Impact with objects and fallen objects).' [2023 Integrated Annual Report, 2023: edp.com] & [Safety, Security & Business Continuity Report, 31/12/2022: edp.com] • Not Met: Expects disclosure of H&S information of relevant business relationships: The Company states in its Supplier Code of Conduct that 'Workplace Safety and Health commitments include: a) Comply with national legislation and international standards in force on workplace safety and health, as well as the EDP Safety Policy and the specific certifications required, observing the precautionary principle in all activities, promoting responsibility and the awareness of everyone involved. b) Identify, monitor and record all risks associated with their activity and specific work tasks, establishing prevention, reduction and continuous improvement measures. c) Train the workers and equip them with the means and equipment for their personal protection, ensuring they have adequate working conditions. d) Define accident management and emergency preparation measures appropriate to the type of activity, location and circumstances. e) Comply with the EDP Group's Safety and Health requirements when acting on EDP Group premises or facilities or acting on behalf of the EDP Group.' However, no evidence is found the Company has a requirement for its suppliers to report quantitative information on health and safety. [Supplier Code of Conduct, 12/05/2017: edp.com] • Not Met: Targets for H&S performance (including injury rates or lost days and fatalities): The Company has target 2025 to achieve severity index (employees and contractors) less than 150 and fatal accidents (employees and contractors) 0. The Company reports that 'The frequency rate (FR) amongst EDP employees and ESP in 2023 grew 13% compared with the previous year, consequently we were unable to achieve the target of 1.64 set for 2023.' However, no evidence is found why the target is not met and how the Company works to improve its health and safety management systems. [2023 Integrated Annual Report, 2023: edp.com]
I.2.PD	Forced labour risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Board level oversight over policies on forced labour in supply chain. How relevant stakeholders informed board discussions: The Company states in its Supplier Code of Conduct that it 'ensures and promotes the respect for free labour, based on fair and transparent contracts for workers, refusing to use and be complicit with forced labour, unjustified restrictions on free movement, misappropriation of documents and remuneration and human trafficking.' However, no evidence found board level responsibility for overseeing forced labour in supply chain. Evidence must include how experiences of affected stakeholders inform board discussions. [Supplier Code of Conduct, 12/05/2017: edp.com] • Not Met: Capacity building with suppliers

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Discloses ongoing efforts to prevent and mitigate forced labour in own ops and supply chain: The Company states that 'Forced and child labor risks are analysed at top management level, management procedures and training are implemented. Direct suppliers and subcontractors are qualified by EDP and 3rd parties to assure that indirect suppliers are also compliant with the fundamental human rights. Suppliers are screened, assessed, audited before and during the contract. Contracts include human rights rules, transparency, and traceability clauses. Contracts include obligations and expectations for second tier suppliers. Additionally, for the suppliers of the electricity sector's value chain, and according to specific risk maps, there is scrutiny on human rights, climatic and environmental issues, on skills and sustainability management practices, financial risks and business continuity, cybersecurity, prevention and safety management, and quality, among others. Once the contractual relationship has been established, where the ESG requirements are converted into contractual clauses, EDP monitors, audits and evaluates the performance of its critical suppliers. However, no evidence found on its ongoing efforts to prevent and mitigate the specific issue of forced labour in its operations and supply chain. [Human and Labour Rights Report 2022, 07/2023: edp.com] • Not Met: Factors to be considered when ending a business relationship incl. responsible disengagement
I.3.PD	Prohibition of forced labour: Wage practices	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on paying in full and on time in supplier codes and contracts: The Company states in its Supplier Code of Conduct that it 'ensures adequate remuneration to workers, in accordance with current legislation and collective labour agreements, when applicable, which shall be paid on time, respecting the minimum wages established in each country, paying overtime and other compensation, social security contributions and taxes that are due.' However, no evidence found on explicit requirement of paying in full. [Supplier Code of Conduct, 12/05/2017: edp.com] • Not Met: Describes work with suppliers on paying workers regularly, in full and on time • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: Employer Pays Principle in policy for own ops and supply chain
I.4.PD	Prohibition of forced labour: Restrictions on workers	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on free movement in supplier codes and contracts and own operations: The Company states in its Supplier Code of Conduct that Labor commitments include: Ensure and promote the respect for free labor, based on fair and transparent contracts for workers, refusing to use and be complicit with forced labor, unjustified restrictions on free movement, misappropriation of documents and remuneration and human trafficking. The Supplier Code of Conduct covers 'entities that supply or intend to supply goods and services to any of the EDP Group companies' However, no further information related to its own operation found. [Supplier Code of Conduct, 12/05/2017: edp.com] • Not Met: Describes working with suppliers on free movement of workers • Not Met: Description of implementation and monitoring of this practice
I.5.PD	Freedom of association and collective bargaining	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Commitment on FoA/CB and requirements in suppliers codes and contracts: The Company states in its Supplier Code of Conduct that it 'respects freedom of association and the collective bargaining of their workers, establishing mechanisms of dialogue free from any reprisals or discrimination.' The Company's human rights policy and code of ethics contains commitments regarding freedom of association and collective bargaining. Finally, the Code of ethics states that 'we must not Determine nor constrain any type of decision based on discriminatory factors, namely [...] political or ideological beliefs, trade union membership, or on the basis of job, activity or professional category'. [Human Rights Policy, 07/2021: edp.com] & [Supplier Code of Conduct, 12/05/2017: edp.com] • Not Met: Describes work with suppliers on FoA/CB • Not Met: Assessment of scope of restriction of FoA/CB in supply chain • Not Met: Global Framework Agreement

Indicator Code	Indicator name	Score (out of 2)	Explanation
I.6.PD	Living wage (in supply chains)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Requirements on living wage in supplier codes and contracts: The Company states in its Supplier Code of Conduct that Labor commitments include: d) Ensure adequate remuneration to workers, in accordance with current legislation and collective labor agreements, when applicable, which shall be paid on time, respecting the minimum wages established in each country, paying overtime and other compensation, social security contributions and taxes that are due. However, respecting the minimum wages does not imply paying the living wage. [Supplier Code of Conduct, 12/05/2017: edp.com] • Not Met: Describes work with suppliers on living wage • Not Met: Description of process to determine living wages with unions: The Company states in its Human Rights Policy that 'The Policy sets out for EDP's sphere of activity its commitment to respect all internationally recognised human and labour rights, namely: b) Within the scope of the International Labour Organization (ILO): vii. The guarantee of payment of a minimum wage (2008 ILO Declaration on Social Justice for a Fair Globalization).' However, no further information found in regard to determining the living wage with unions

J. Right to a healthy and clean environment

Indicator Code	Indicator name	Score (out of 2)	Explanation
J.1.PD	Environmental impact assessment and remediation	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Conducts EIA for renewable energy projects: Regarding pollution prevention, the Company states that 'The environmental aspects and potential impacts are assessed within the scope of the environmental management systems in facilities and activities, certified according to ISO 14001 across the EDP group, also in the thermal and hydroelectric production facilities in Portugal to comply with the Eco-Management and Audit Scheme (EMAS) registration.' However, no evidence found the Company conducts environmental impact assessments for its renewable energy projects. [2023 Integrated Annual Report, 2023: edp.com] • Not Met: Publishes EIA for renewable energy projects • Not Met: Explains when CIA is conducted
J.2.PD	Life cycle assessment	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Expectation for suppliers to conduct regular public life cycle assessments: The Company states that 'In order to support the decarbonisation efforts of the business fabric in the Iberian Peninsula, EDP offers a multi-sector, turnkey Going Net Zero solution to support the transition to emission-neutral businesses. This service includes the measurement of corporate greenhouse gas emissions or product catalogue through life cycle analysis and promotes the implementation of mitigation plans.' However, no evidence found the Company has a requirement for its suppliers to conduct regular public LCA of its primary technologies. [Integrated Annual Report 2022, 31/12/2023: edp.com] • Not Met: Requires suppliers to have action plans to address adverse impacts identified

K. Transparency and anti-corruption

Indicator Code	Indicator name	Score (out of 2)	Explanation
K.1.PD	Anti-corruption due diligence and reporting	1.3333	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Commitment to prohibiting bribes to public officials: The Company states in its Code of Ethics that 'EDP prohibits the practice of corruption and bribery, actively or passively, through acts or omissions, including the creation and maintenance of situations of favouritism through facilitation payments or other irregularities.' The Company also states in its Integrity Policy that 'the EDP Group adhered to the 10 principles of the United Nations Global Compact, which includes the Anti-Corruption principle and within which companies must work to fight corruption in all its forms' and 'any practice or conduct that may configure, assist or appear any of the situations below are, in particular, strictly forbidden, a) corruption, b) bribery, including facilitation payment.' The Company has comments that there are various types of corruption, but the following are the most relevant for the purposes of integrity policy. - Passive corruption (of a public official or holder of political office): The request, receipt or acceptance of the promise, directly or indirectly, of any undue advantages, for their own benefit or that of third parties, for the practice or abstention from the practice of an act in the exercise of their functions, contrary or not to the duties of the position, even if prior to that request, receipt or acceptance of the promise; - Active corruption (of a public official or holder of political office): The promise to deliver or delivery, directly or indirectly, of undue advantages, for their own benefit or that of third parties, so that an official or holder of political office practices or refrains from performing an act in the exercise of their functions, contrary or not to the duties of office, even if prior to that promise or delivery.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>[Code of Ethics, 2024: edp.com] & [EDP Group Integrity Policy, 23/05/2023: edp.com]</p> <ul style="list-style-type: none"> • Not Met: Expectation extends to relevant business relationships: The Company states in its Supplier Code of Conduct that compliance commitments include: b) Not to pursue, permit, consent to or collude with any activity, practice or conduct likely to constitute or appear to be an act of bribery and/or corruption, criminally punishable under applicable law. Also, to institute procedures and implement necessary and appropriate measures aimed at preventing their occurrence. However, no evidence is found that the requirements apply to all relevant contractors, subcontractors, and other business relationships as well. [Supplier Code of Conduct, 12/05/2017: edp.com] • Met: Reports on any complaints on corruption and bribery: The Company reports that 'The conclusion of the analysis of 54 cases (2022: 14) related to corruption and bribery - 7 carried over from 2022 and 69 new ones received in 2023 - reported through the different whistleblowing channels made available by the EDP group. Of these, two were considered substantiated, being related to the improper performance of service providers, with whom the contractual relationship was consequently terminated.' [Integrated Annual Report 2022, 31/12/2023: edp.com]
K.2.PD	Payments to governments & contract transparency	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Publishing a tax CbCR in line with GRI 207-4: The company reports that 'In 2023, EDP Group's global tax contribution to the public revenues of the countries where it is present amounted to approximately 2.9 billion euros, of which 0.9 billion euros correspond to own taxes and contributions borne (paid) by the EDP Group and circa 2 billion euros of taxes collected (contributions to the States on behalf of other economic agents) [...]'. The Company has published country by country tax contribution. [2023 Integrated Annual Report, 2023: edp.com] • Not Met: Disclosure of terms, contracts, agreements for those payments • Not Met: Supports governments to disclose contracts and licenses on renewable energy project in line with EITI • Not Met: Disclosure of payments for land purchase made to governments at project-level

L. Diversity, equality and inclusion

Indicator Code	Indicator name	Score (out of 2)	Explanation
L.1.PD	Diversity, equality & inclusion training for management and employees	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Provides mandatory and regular training as per ILO No 190: The Company states that total 5,714 hours of training for Ethics were conducted in EDP Group. However, no further details found on the training to its staff on all types of contracts on equality, equity, diversity, and anti-discrimination. [Human and Labour Rights Report 2022, 07/2023: edp.com] • Not Met: Requires suppliers to provide training • Not Met: Provides materials and access to resources for trainings • Not Met: The trainings include gender-based violence and the Company's policies and mechanisms for addressing it
L.2.PD	Gender balance and sensitivity	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Timebound action plan to integrate gender lens to all relevant documents including on value chain: The Company states that includes requirements on non-discrimination in its Human Rights Policy, Supplier Code of Conduct, Code of Ethics, and Human and Labour Reports. The Company also has Gender Equality Plan, which is part of a broader set of initiatives developed by EDP, both globally and locally in all geographies where it operates, matching the commitments and principles it has already taken up in terms of diversity, namely by: Promoting mutual respect and ensuring equal opportunities in the face of diversity for all people at the company; Acknowledging and appreciating diversity of identity, of life experiences or of cognitive and neurological functioning, as a source for strengthening human potential, creativity, and innovation in management and business strategy; Adopting positive actions and awareness-raising measures internally and within the community, with a view to the actual implementation and effectiveness of the DEIB Policy. However, this subindicator looks for evidence of a time-bound action plan to integrate gender lens not only to policies but to practices including human rights due diligence process, risk management and remedy including supply chain. [Plan for Gender Equality, 2023: edp.com] • Not Met: Demonstrates progress through annual reporting: The Company states that it has reported percentage of female employees from 2019 to 2022. Such as in 2022, the rate of female employees was 27.5%. However, this subindicator looks for evidence of progress in adopting an action plan to integrate gender lens to both

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>policies and practices in human rights including due diligence processes and risk management [Integrated Annual Report 2022, 31/12/2023: edp.com]</p> <ul style="list-style-type: none"> • Not Met: Women and non-binary people make up at least 40% of the Company's executives • Met: Women and non-binary people make up at least 40% of the Company's board of directors: The Company has reported that there are five members of Executive Board of Directors. Two out of them are female, which accounts for 40%.
L3.PD	Gender wage gap reporting	0.6667	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Has closed gender wage gap or timebound commitment • Met: Reports information at company level across multiple pay bands: The Company reports that pay ratio by gender is 1.04 (F/M) at group level, 1.11 in Portugal, 0.89 in Spain, 0.98 in South American, 0.97 in North America, 0.79 in rest of the Europe, and 1.01 in APAC in 2023. [Integrated Annual Report 2022, 31/12/2023: edp.com] • Not Met: Expects business relationships to do the same

JT. Just transition

Indicator Code	Indicator name	Score (out of 2)	Explanation
JT.1	Fundamentals of social dialogue and stakeholder engagement in a just transition	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public commitment to engage in social dialogue with appropriate parties for purposes of bipartite or tripartite negotiations: The Company states that 'Employment opportunities are key in planning for a low carbon economy. EDP's planned investment in climate transition leads to an intensive job creation, with the Group anticipating more than 3,500 new hires by 2026. Overall, in 2023, the EDP's group impacted more than 32,000 people through more than 140 initiatives and strong positioning on its main social networks, which resulted in more than 400 people-related content. This attractiveness strategy gave rise to a high level of applications in EDP's different markets (over 50.000), resulting in 1,425 new hires and 677 internships. In addition to job generation, EDP is consolidating and reinforcing its internal talent to compete in an evolving sector. To empower and prepare for the future EDP will continue to focus on training in upskilling and reskilling, reaching up to 45% of its employees. The EDP group's total training volume in 2023 resulted in more than 375,000 hours of training, reinforced by worldwide access to on-demand content, currently with 72% coverage. According to the organisational climate survey results, 76% of employees believe EDP provides learning opportunities, experiences, and tools to do their jobs in the best possible way.' However, no commitment was found to hold social dialogue with workers or their representatives. No further evidence of a commitment to engage in social dialogue for the purposes of bipartite or tripartite negotiations was found. [Climate Transition Plan Progress Report 2023: edp.com] • Met: Discloses the categories of stakeholders it engages with on a Just Transition and how they were identified.: The Company indicates that on the topic of a just transition it engages with workers, suppliers, and local communities. [Climate Transition Plan Progress Report 2023: edp.com] • Not Met: Disclosure of steps taken to engage with identified stakeholders and its approach to supporting a just transition. • Not Met: Demonstrates social dialogue and meaningful engagement with stakeholders on all aspects of a just transition.
JT.2	Fundamentals of just transition planning	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Demonstrates how it engages in social dialogue, especially with unions and with stakeholders, in the development of its transition planning. • Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on workers.: The Company states ' EDP's planned investment in climate transition leads to an intensive job creation, with the Group anticipating more than 3,000 new hires by 2026. In addition to job generation, EDP is consolidating and reinforcing its internal talent to compete in an evolving sector. To empower and prepare for the future EDP will continue to focus on training in upskilling and reskilling, reaching up to 45% of its employees' [2023 Climate Transition Plan: edp.com] • Met: Sets time-bound and measurable indicators to mitigate the social impacts of low carbon transition on affected stakeholders: The Company states 'By 2030, EDP aims to reach €300 Mn of investment in the communities, accumulated from 2021.' [2023 Climate Transition Plan: edp.com] • Not Met: Sets time-bound and measurable indicators to mitigate social impacts of low carbon transition on business relationships.
JT.3.PD	Fundamentals of creating and	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Public Commitment to create and provide or support access to green and decent jobs, as part of the low carbon transition.: The Company states that

Indicator Code	Indicator name	Score (out of 2)	Explanation
	providing or supporting access to green and decent jobs for an inclusive and balanced workforce		<p>'EDP Generation in Portugal launched the Nature4Tomorrow Program, aiming to promoting biodiversity and contribute to CO2 sequestration. The Alto Lindoso reforestation project, covering 22 hectares in the National Park of Peneda Geres, is the first project aiming to enhance ecological conditions and support EDP's commitment to Net Zero by 2030. The project benefits the environment but also promotes economic benefits for local communities and green job creation.' The Company also reports that 'Social impact program Futuro Ativo Sines, specifically addressed the needs of the subcontractor's workers, as well as the local community at large, with entrepreneurship programs, vocational training in partnership with the employment agency, support for local action NGO's, a dedicated office for social support, etc. It was designed as a Fair Transition tool for the southern Portuguese region and promoted (from its early academic assessment on the local economy perspectives) the launch of the Observatory for the Just Transition of Alentejo Litoral. The numbers evolved in 2023, showing the success of its implementation: 77% have found new jobs, and are now working; 12% in training and 11% retired or are under health leave.' However, no evidence found the Company has a public commitment to create and provide green and decent jobs. [2023 Integrated Annual Report, 2023: edp.com]</p> <ul style="list-style-type: none"> • Not Met: Assesses and discloses the risk of employment dislocation caused by low carbon transition and related impacts on affected stakeholders. • Not Met: Demonstrates measures taken to create and support access to green and decent jobs for affected stakeholders. • Not Met: Demonstrates measures taken to ensure green and decent jobs promoting equality of opportunity for women and vulnerable groups
JT.4.PD	Fundamentals of retaining and re- and/or up-skilling workers for an inclusive and balanced workforce	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Public commitment to re-and/or up-skills workers displaced by the transition to a low carbon economy.: The Company reports that for communities, the Company has provided 1,425 new hires and 86% were training in upskilling and reskilling program. The Company has Goal 2026 to provide more than 3,000 new hires in communities and maintain 45% received upskilling and reskilling program. [2023 Integrated Annual Report, 2023: edp.com] • Not Met: Disclosure of its process(es) for identifying skills gaps for workers and affected stakeholders, in the context of the low carbon transition. • Not Met: Demonstrates measures taken to provide re-and/or upskilling, training or education opportunities for relevant stakeholders. • Not Met: Demonstrates measures taken to ensure that the re-and/or upskilling, training or education opportunities promoting equality of opportunity for women and vulnerable groups.
JT.5.PD	Fundamentals of social protection and social impact management for a just transition	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Discloses contribution to social protection systems for relevant stakeholders, and expectations on business relationships to contribute to social protection of affected stakeholders. • Not Met: Discloses its processes for identifying impacts of low carbon transition on workers' and affected stakeholders' social protection. • Met: Demonstrates contribution to addressing the impact of the low carbon transition on workers' social protection.: The Company indicates 'just Transition is a priority of EDP's business strategy, and the company is committed to ensuring the social protection of unemployed direct workers, favouring their redeployment of these workers to new job opportunities, ensuring their requalification, and mitigating their relocation. EDP also advocates for effective public policies for social protection and requalification of directly and indirect workers affected in the framework and spirit of the European Fair Transition Mechanism.' [2023 Climate Transition Plan: edp.com] • Met: Demonstrates contribution to addressing the impact of the low carbon transition on affected stakeholders' social protection.: The Company states 'As part of the strategy to support the electrification of populations without access to energy (A2E), the A2E Fund was set up to improve the lives of people living in energy poverty, recognizing that access to clean, affordable, and reliable energy is a necessary condition for breaking this cycle, enabling social and economic development in remote rural areas. Through this Fund, EDP supports sustainable, clean energy projects in the areas of education, health, water and agriculture, business, and community. By 2025, €22.5 Mn will be invested in access to energy projects, with an additional €50 Mn of investment in communities, in projects aligned with the United Nations' Sustainable Development Goals. By 2030, EDP aims to reach €300 Mn of investment in the communities, accumulated from 2021. ' [2023 Climate Transition Plan: edp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
	destination markets		<p>In response to the BHRRC in 2021, the Company states that "In the international organizations in which EDP participates, EDP defends the creation of an international traceability system. [...] To act against forced labor, EDP dialogues with its direct suppliers (end-user manufacturers) to establish specific contractual procedures and disclosures, which must be extended to second tier suppliers. EDP already applies traceability contractual rules, including audits, and identifies indirect suppliers, specially the local origin of silicon. [...] In addition, during this phase and during the execution of contracts, the traceability of the supply chain is a key issue to monitor and avoid potential human rights risks. The Company establishes as one of the main requirements of the agreements to know the supplier's supply chain management and to have a traceability map of the processes that take place upstream in its value chain. The localization and ownership of the upstream manufacture sites is the key factor in assuring the value chain traceability.' However, this does not indicate full transparent mapping of the Company's full solar supply chain. [Business and Human Rights Resource Centre, 12/07/2023, "EDP's response": media.business-humanrights.org] [Human and Labour Rights Report 2022, 07/2023: edp.com] & [Sustainable Supply Chain Report 2022, 06/2023: edp.com]</p> <ul style="list-style-type: none"> • Not Met: Publication of verified full solar supply chains: In its Supply Chain Report 2022, EDP provides information regarding its supply chain. This includes the number of suppliers per region, purchase volume per region, country origin of fuels, critical suppliers, and a breakdown of environmental and social metrics for its whole supply chain. While the Company's supply chain policies and procedures are noteworthy first steps towards better transparency, the level of granularity on mapping its supply chain is fragmented. [Sustainable Supply Chain Report 2022, 06/2023: edp.com]
M(0).2	The company explains steps taken and how these align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Steps taken aligned with UNGPs: In response to the BHRRC in 2021, the Company states that it doesn't source from Xinjiang. However, it is not clear whether this statement extends to the full supply chain with independent verification. In addition, no information was found that meet the criteria on explaining how steps taken align with steps expected by the UN Guiding Principles (including reference to assessment of severity of risks, leverage, and crucial nature of business relationships) at the time this research is conducted. [Business and Human Rights Resource Centre, 12/07/2023, "EDP's response": media.business-humanrights.org] • Not Met: Information relevant to all destination markets

3.b Serious Allegations (10% of total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
M(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Land Rights • Headline: Communities reportedly feel right to FPIC was not respected • Story: Report raises concerns about free, prior and informed consent related to project development and subsequent modifications, among other concerns regarding project impacts on communities. [Heinrich Böll Foundation, 04/2023, "The Wayuu wind flies through the sea and the guajiro land": co.boell.org]
M(1).1	The company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Met: Public response: In a statement provided to the Business and Human Rights Resource Centre, the Company indicates ' some projects, including EDPR's, are in Indigenous Reservations areas – territories of a collective nature in which projects can be developed through compensation agreed upon in prior consultations. Taking this into consideration, we have been in contact with the local communities since our entry in the Colombian market, working closely with them and participating in different initiatives in the country. EDPR is especially active in the region of La Guajira in which the Wayuu (an Indigenous American ethnic group) are present, and where we have a social local team of 7 people with previous

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>specific experience in relations and prior consultation with Wayuu communities, complemented by a team of 20 contractors of which 18 are Wayuus, ensuring we have a close connection and understanding of the reality. [...] after this process, internal conflicts arose between the members of a community, causing one fatality. This resulted in community members to provisionally move out of the territory for safety purposes. We believe it is important to clarify that the conflict and consequent displacement were caused by differences between members of the territory, and that EDP and its employees have never harassed, exerted pressure or force any scenario towards the communities. Nonetheless, we are implementing a strategy so that the families affected benefit from the project. ' [Business and Human Rights Resource Centre, 15/08/2023, "EDP responds": media.business-humanrights.org]</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The Company does not directly address the concerns raised with the process of free, prior and informed consent. While it does outline the steps taken, it refers to internal conflicts within the community that it claims arose after the processes was completed. The response does not directly acknowledge that concerns are raised about the FPIC process itself.
M(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders • Not Met: Identified cause • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
M(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Remedy satisfactory to stakeholders

4. Low-Carbon Transition Assessment (20% of total)

Indicator Code	Indicator name	Score (%)	Explanation
n/a	Emissions targets	87.5	<ol style="list-style-type: none"> 1. Has the Company set and disclosed a Scope 1+2 short term target? “Near-Term Targets (2030) - from a 2020 base year: i. reduce scope 1 and 2 GHG emissions 95% per MWh generated electricity by 2030 (relative).” Source: 2024 Integrated Annual Report, page 192. https://www.edp.com/sites/default/files/2025-03/Integrated%20Annual%20Report%202024%20-%20Unofficial%20Version%20-%20Unaudited.pdf 2. Has the Company set and disclosed a Scope 1+2 long term target set? “reduce scope 1 and 2 GHG emissions 96% per MWh generated electricity by 2040 (relative).” Source: 2024 Integrated Annual Report, page 192. https://www.edp.com/sites/default/files/2025-03/Integrated%20Annual%20Report%202024%20-%20Unofficial%20Version%20-%20Unaudited.pdf 3. Is the Scope 1+2 short term target aligned with a net zero emissions scenario? Yes, see above 4. Is the Scope 1+2 long term target aligned with a net zero emissions scenario? “Reduce scope 1 and 2 GHG emissions 96% per MWh generated electricity by 2040 (relative).” Source: 2024 Integrated Annual Report, page 192. https://www.edp.com/sites/default/files/2025-03/Integrated%20Annual%20Report%202024%20-%20Unofficial%20Version%20-%20Unaudited.pdf 5. Has the Company set and disclosed a Scope 3 short term target? “Reduce absolute scope 3 emissions from use of sold products 45% by 2030 (absolute) iv. reduce all other absolute scope 3 GHG emissions 45% by 2030 (absolute). EDP has set emissions reduction targets both for near-term (2030) and long-term (2040), as well as a Net Zero target by 2040, that have been

			<p>approved by the SBTi. By having set the targets following the Corporate Net Zero Standard and the Power Sector guidance from the SBTi, EDP guarantees the alignment with the 1.5°C trajectory, i.e., limiting of global warming to 1.5°C in line with the Paris Agreement. These targets cover all scopes of emissions (Scope 1, Scope 2 and Scope 3) and are the main pillar of EDP's Climate Transition Plan." Source: 2024 Integrated Annual Report, page 192. https://www.edp.com/sites/default/files/2025-03/Integrated%20Annual%20Report%202024%20-%20Unofficial%20Version%20-%20Unaudited.pdf</p> <p>6. Has the Company set and disclosed a Scope 3 long term target? Yes, evidence above</p> <p>7. Is the Scope 3 short term target aligned with a net zero emissions scenario? No, less than 60%</p> <p>8. Is the Scope 3 long term target aligned with a net zero emissions scenario? Yes, evidence above</p>
n/a	Share of Low Carbon CAPEX	93	<p>Low Carbon CAPEX: "CAPEX of environmentally sustainable activities (Taxonomy aligned activities) (A.1.) 4,428,852,903 CAPEX (3)euros."</p> <p>Total CAPEX: CAPEX (3) euros Total 4,745,451,458.</p> <p>Source: 2024 Integrated Annual Report, page 148 and 149. https://www.edp.com/sites/default/files/2025-03/Integrated%20Annual%20Report%202024%20-%20Unofficial%20Version%20-%20Unaudited.pdf</p>
<u>Final score</u>		90	

Disclaimer

This scorecard is based on assessments of publicly available documents on companies' websites by the EIRIS Foundation and BHRRC. Preliminary assessments were shared with companies for feedback. Feedback provided by companies has been analysed and incorporated when relevant to the indicator assessed. Information published or provided by companies after established and communicated cut-off dates* are not included for this year's Benchmark. As such this scorecard should be seen as a reflection of feedback received as of April 2025.

The use of the label "Not met" in the research does not necessarily mean that the company does not meet the requirements as they are described in the accompanying bullet point short text. Rather, it means that the analysts could not find information in public sources that met the requirements as described in full in the 2025 Renewable Energy & Human Rights Methodology document. It is possible that a Company meets the criteria without yet publishing the relevant evidence of doing so. This may include cases where a company has claimed to meet the criteria in the engagement phase or otherwise but where the public record was still not sufficient to meet the criteria by the relevant cut off dates.

While the EIRIS Foundations and BHRRC have made reasonable endeavours to ensure that the methodology reflects best and emerging business and human rights practice in identifying, preventing, mitigating and remedying human rights harms as well as other responsible business conduct, it is not currently possible to measure certain human rights harms or other negative impacts directly. As such, a low score in respect of a particular indicator should not be read as implying that harms are necessarily taking place: rather it is a sign that companies have not demonstrated the steps set out in the methodology to reduce the risk of such harms or to uphold other responsible business conduct in the ways described. Conversely, a high score in a particular section or for a specific indicator should not be interpreted as a guarantee of future absence of human rights harm.

Scores for companies in the different project developer sub-categories (electric utilities, oil and gas, independent power producers) should not be compared to one another as these categories have been designed to allow for integration of an assessment of efforts towards full decarbonisation of energy production for project developers and oil and gas companies, based on the World Benchmarking Alliance's Oil & Gas and Electric Utilities Benchmark, using ACT methodologies. **Scores for equipment (wind turbines and solar) manufacturers should not be compared to project developer scores** as indicators have been tailored to reflect their position in renewable energy value chains.

Caution should be exercised in interpreting small differences in scores between companies within the same category and particularly small differences in the overall weighted scores because of the diversity of independent elements that are combined to produce the overall weighted scores. Scores should be understood in the context of the methods and weightings explained in the Methodology.

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* Cut-off dates: 31 January 2025 for companies that did not engage with the benchmark; the expiration of the feedback period (25 April 2025) for companies that engaged with the benchmark and provided additional documents published during that period.

contained therein or to correct any inaccuracies. That said, the assessment process has been conducted by BHRRC and its research partner the EIRIS Foundation in good faith and in the spirit of dialogue and cooperation.

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