



# Human and Labour Rights Policy

EDPR respects and undertakes to promote fair human and labour practices, being committed to guarantee responsible operations throughout the whole value chain

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## A – Purpose and scope

### 1. Framework

EDPR is a sustainable company working towards a better world for current and future generations. In this context, EDPR is a signatory of the UN Global Compact initiative, which establishes ten principles in the areas of human rights, labour, environment and anti-corruption, and is firmly committed to eight of the seventeen Sustainable Development Goals defined for the 2015–2030 horizon.

EDPR is specifically committed to integrate the social aspects in planning and decision-making, to respect and promote respect for human and labour rights and to reject abusive and discriminatory practices. This is reflected in EDPR's Code of Ethics, which was first approved in 2009 and contains specific clauses regarding non-discrimination and equal opportunities, in line with the Company's culture of diversity and respect for human and labour rights. In 2020, the Code of Ethics was revised and updated in order to make it more current, allowing for a more direct address of the ethical issues that are very relevant today for EDPR.

Given the update of the Code of Ethics and the Company's growth strategy, which implies the increase and globalisation of investment opportunities, it became necessary to also update related policies and procedures, namely to create a specific policy of respect for human and labour rights.

### 2. Objective

This Policy aims to ensure respect for Human and Labour Rights in EDPR's sphere of activity, implementing the commitments defined in its policies (refer to section 4.), specifying the international reference treaties and standards (refer to sections 5. and 6.) and establishing the procedures that ensure compliance with them.

### 3. Scope

The Policy applies to all EDPR Group companies and employees, business relationship and activities, in all its geographic locations, regardless of the local practices or level of social and economic development.

In implementing the Policy, the EDPR Group respects national legislation and international treaties and standards according to the stringent standards. The Policy is in force even though national law may not transpose the international treaties and standards.

## B – Internal and external references

### 4. EDPR's references

This Policy develops and implements the principles of respect for human and labour rights established in the following fundamental policies:

- a) EDPR's Code of Ethics
- b) EDPR's Stakeholder Relationship Policy
- c) EDP Group's Supplier Code of Conduct

### 5. International standards and directives

This Policy transposes to EDPR's sphere of activity the human and labour rights commitments and procedures defined by international standards and directives, namely:

- d) United Nations Global Compact
- e) United Nations Guiding Principles on Business and Human Rights
- f) OECD Due Diligence Guidance for Responsible Business Conduct
- g) Directive of the European Parliament and of the Council on Corporate Due Diligence and Corporate Accountability

### 6. International treaties and conventions

The Policy sets out for EDPR's sphere of activity its commitment to respect all internationally recognised human and labour rights, namely:

- a) Within the scope of the United Nations Organization:
  - i. "International Bill of Human Rights", including:
    - i. Universal Declaration of Human Rights, 1948
    - ii. International Covenant on Civil and Political Rights, 1966
    - iii. International Covenant on Economic, Social and Cultural Rights, 1966
  - ii. Instruments to protect vulnerable people and groups, including:
    - i. International Convention on the Elimination of All Forms of Racial Discrimination (1965)
    - ii. Convention on the Elimination of All Forms of Discrimination against Women, 1979
    - iii. Convention on the Rights of the Child, 1989
    - iv. International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, 1990
    - v. Convention on the Rights of Persons with Disabilities, 2006
    - vi. Declaration on the Rights of Indigenous Peoples, 2007

- b) Within the scope of the International Labour Organization (ILO):
- i. The eight Fundamental Principles and Rights at Work and related conventions, including:
    - i. Freedom of Association and Protection of the Right to Organize Convention, (No.87), and the Right to Organize and Collective Bargaining Convention, (No.98)
    - ii. The elimination of all forms of forced or compulsory labour (Conventions 29 and 105)
    - iii. The effective abolition of child labour (Conventions 138 and 182)
    - iv. The elimination of discrimination in relation to employment and occupation (Conventions 100 and 111)
    - v. Respect Labour Standards on Working time (Conventions 1, 14 and 106)
    - vi. Protection of Occupational Health and Safety (Conventions 155 and 187, Protocol 2002)
    - vii. The guarantee of payment of a minimum wage (2008 ILO Declaration on Social Justice for a Fair Globalization).
    - viii. Understanding the Indigenous and Tribal Peoples Convention, 1989 (No. 169)
  - ii. The Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy regarding the principles and conventions not included in the eight Fundamental Principles and Rights at Work where applicable.

## C – Description and responsibilities

### 7. Strategic commitments

EDPR is committed to respecting and enforcing all internationally recognised human and labour rights, identified in article 6. This commitment means:

- a) Support the International Bill of Human Rights, subscribe to and implement the Principles of the Global Compact and the instruments to protect vulnerable people and groups
- b) Apply 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
- c) Operate a human and labour 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

## 8. Action principles

EDPR implements its strategic commitments to respect all internationally recognised human and labour rights, identified in article 6, through the application of the following action principles:

- a) 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 Labour Rights Risk Map up to date
- b) Guarantee it will not be complicit in human and labour rights abuses or disrespect
- c) Recognise as stakeholders: workers and their families, local communities, and any other person or group of people whose lives and environment may be influenced by EDPR's activities, including their legitimate representatives, labour unions, social or environmental organisations
- d) Engage constructively with its stakeholders, especially those affected or likely to be affected by its activities, incorporating their views and concerns within business decisions and the development of its approach to human and labour rights
- 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
- f) Ensure the proper functioning of a system to report occurrences and make complaints, with a guarantee of confidentiality and non-retaliation
- g) Communicate and report with transparency its approach to human and labour rights, identifying risks and impacts, mitigation, compensation, and remediation measures taken and the results of such actions
- 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
- 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

## 9. Operational procedures

Policy implementation in field activities is ensured through the adoption of operational procedures that include, in particular:

- a) Adopting a risk mapping methodology involving the ongoing updating and quality control of the risk map and salient impacts on human rights related to the Group's activities, informed by international references, by proactive listening to stakeholders, by the complaints system and by the media
- 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
- c) Communicating human and labour rights to its target audiences in an accessible and appropriate manner, especially to affected stakeholders who raise issues, providing quality information to assess the appropriateness of the response(s), in a way that does not pose risks to stakeholders or affected personnel
- d) Applying human and labour 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
- e) Applying requirements for assessing, contracting, training, auditing, and excluding suppliers regarding human and labour rights practices. Specially for supply chains that are internationally recognised as being at risk, suppliers shall be bound to the following obligations:
  - i. Provide complaint channels or mechanisms (proprietary, third-party, or shared)
  - ii. 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

## 10. Governance model

To ensure effective management of respect for Human and Labour Rights established in this Policy, EDPR:

- a) Assigns a corporate senior director to the strategic and operational management of the Policy implementation, that assumes direct responsibility to the Company's Management Team.
- b) Allocates the responsibility for overseeing the management of Human and Labour Rights topics to the ESG Committee at the Management Team level.
- c) Assigns the ultimate responsibility for overseeing the management Human and Labour Rights topics to the ESG Committee at the Board of Directors level.

## D – Final provisions

### 11. Grievance mechanism

EDPR's Speak Up Channel is accessible to all employees, customers, suppliers and other stakeholders that may be adversely impacted by the Company or, irrespective of this, that wish to complain, denounce, clarify or expose any situation of ethical nature, i.e. those related to human and labour rights. As of today, the Speak Up Channel is available at:

- a) <https://www.edpr.com/en/speak-up> (English)
- b) <https://www.edpr.com/pt-pt/speak-up> (Portuguese)
- c) <https://www.edpr.com/es/speak-up> (Spanish)

### 12. Communication

The communication of this Policy is carried out on a permanent basis, as follows:

- a) Published on the corporate website and intranet
- b) Communicated, explained, integrated within the training plans and explicitly made known to and acknowledged by the employees
- c) Included in EDPR's business relationships with other companies, namely suppliers, equity stakes and joint ventures

Approved by the EDP Renováveis S.A. Board of Directors on October 25, 2022.