



Social Investment Policy

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1. VERSION HISTORY

Version	Approval Date	Elaboration	Approval	Remarks	Main Changes
1.	30/07/2018	SUST	EDPR EC	Initial issue	-
2.	22/04/2024	Social & Foundations/ ETH&C	EDPR MT	Review	Review of the definition of social investment, strategic axes, and responsibilities
2.	17/12/2024	Social & Foundations/ ETH&C	EDPR BoD	Review	Review of the definition of social investment, strategic axes, and responsibilities

Considering that:

- a) The main international references recommend companies to define and publish a Social Investment Policy, which establishes the alignment between business priorities and the social contexts and challenges relevant to business success;
- b) In 2018, EDPR defined a Social Investment Policy, defining the concept of social investment and integrating the experience and work carried out by EDPR;
- c) It is deemed appropriate to review the EDPR's Social Investment Policy, considering the United Nations Sustainable Development Goals, international best practices regarding social investment, the 2025 Social Investment objectives and the EDPR Strategic Plan, ensuring:
 - i. The establishment of a reference framework for Social Investment, which, harmonizing the objectives, commitments and strategies of EDPR, guarantees the autonomy and accountability of the Business Units and Corporate Departments;
 - ii. The definition of Social Investment, to cover both voluntary and mandatory community investment, as well as innovation and procurement for Social Impact;

2. OBJECTIVE

This Policy establishes the objectives, corporate strategies and regulations regarding EDPR's Social Investment, which is expressed in social responsibility programs and projects in the community through own and collaborative initiatives, donations and volunteering.

3. SCOPE

This Policy is applicable to all entities that make up EDPR, to the respective directors, employees, service providers who act in their name or on behalf of them and in their direct or indirect interest, regardless of the nature or form of their legal relationship with the respective entity and the legal framework applicable in the countries where EDPR is present.

4. REFERENCES

External References

The Social Investment Policy applies the principles and methodologies referred to in the following documents:

1. ISO 26000 – Social Responsibility
2. Principles for Responsible Investment – United Nations
3. Sustainable Development Goals (SDGs) – United Nations
4. Global Reporting Initiative (GRI) guidelines
5. B4SI – Business for Societal Impact

Internal References

The Social Investment Policy must be interpreted in conjunction with the following policies and commitments:

1. Principles of Sustainable Development
2. Integrity Policy
3. Social Investment Management Procedure
4. Stakeholder Relationship Policy and Stakeholder Segmentation Model
5. Local Stakeholder Engagement Policy
6. Stakeholder Management Methodology Guide (includes Local Stakeholder Engagement Plan)
7. Interest Representation Policy
8. Code of Ethics
9. Materiality Guide
10. Volunteering Policy
11. Commitment to the Sustainable Development Goals
12. Procedure for Integrity Due Diligence of Third Parties and Employee Candidates (IDD)
13. Procedure for Relationship with Politically Exposed Persons (PEP)

14. Procedure for Donations and Sponsorships
15. Procedure for Prevention and Management of Conflicts of Interest

5. TERMS AND DEFINITIONS

EDPR Structure	Any Business Unit or Department of EDPR
Local Community	All people, groups of people or entities that influence or are influenced (negatively or positively) by EDPR's activities.
Program	EDPR's own strategic, structured, and medium and/or long-term axis of action carried out through multiple projects; can be transversal to each EDPR Structure.
Projects	Includes any activity, initiative, action, or event that fits into a Program.
Social & Foundations	Social & Foundations - responsible for defining and coordinating the EDPR's social impact strategy
Social Investment	<p>Financial and non-financial contributions (in-kind or volunteer time), given without counterparts, that are proven to help local communities and societies at large address their development priorities.</p> <p>It also includes investments in innovation of the company's products, services, or operations, as well as operational expenses with procurement processes, which create a clearly defined and demonstrable social impact.</p> <p>For example. The company chooses products/services from a social organization that employs disadvantaged people; The company invests in innovative products/services that contribute to solving a social need.</p>

In addition to the specific definitions mentioned above, the definitions contained in the EDPR Integrity Policy must be considered.

6. DESCRIPTION

6.1 Strategic axes and objectives

EDPR's Social Investment programs and projects are oriented towards the following strategic axes, with defined investment objectives up to 2025:

- a) Fair Energy Transition – includes projects to support access to energy, energy inclusion and communities impacted by the closure of thermal power stations, projects aimed at protecting the natural heritage and biodiversity, projects promoting energy efficiency and renewable energies, contributing for decarbonization and the fight against climate change, as well as educational projects in these fields.
- b) Culture – includes projects whose mission is to promote access to art and culture and the protection of tangible and intangible cultural heritage.
- c) Other social needs – includes support for projects that respond to other social needs in the communities where EDPR is present, such as social inclusion and support for vulnerable individuals, training/education initiatives, response to emergency situations and promotion of health and sustainable livelihoods.

6.2 Commitments

In the development of its Social Investment activity, EDPR undertakes to:

- Create value for stakeholders and for EDPR, through Social Investment programs and projects that combine the satisfaction of social needs, and the core needs and themes of the EDPR's businesses.
- Act in accordance with the Social Responsibility Principles and the UN Social Investment Principles of Relevance, Accountability, Transparency, Ethical Conduct and Respect.
- Act in accordance with the principles set out in the Code of Ethics and Integrity Policy, as well as with the rules established in the Due Diligence Procedure for the Integrity of Third Parties and Candidate Employees and in the Relationship Procedure with Politically Exposed Persons and other internal regulations in force, with a view to ensuring greater transparency and mitigating situations of corruption and bribery or improper conduct, even if apparent or potential, namely:
 - i. Compliance with all applicable legislation and regulations;
 - ii. Compliance with international good practices;
 - iii. The non-attribution (neither its promise, nor the mere making of references to this possibility) to any third party, of undue or unjustified material or non-material

advantages, regardless of whether or not they constitute consideration for the practice of any act or omission;

- iv. Not making contributions of any kind, nor associating the EDPR brand with any political party, candidate, campaign structures/political candidacy or related people or entities or initiatives/campaigns of a religious nature;
 - v. Non-involvement in any activity that could potentially give rise to situations of conflict of interest.
- Promoting the continuous improvement of program performance through the definition of plans, objectives, and goals, from a medium and long-term perspective and the establishment of adequate criteria for the selection, development, monitoring and evaluation of results, using a corporate methodology of evaluation of benefits for society and for the business, internationally recognized.
 - Verify and audit the proper fulfillment of the Social Investment Policy.
 - Define human resources policies and provide adequate means of communication, organizational structures, financial resources, goods, and services for the development of programs and projects.
 - Publicly and transparently communicate its Social Investment Policy, its programs and the performance achieved.

6.3 Strategies

The defined objectives and commitments must be implemented through the following strategic lines:

1. Develop own programs and collaborate in third-party activities aligned with the EDPR's Social Investment objectives and commitments;
2. Promote corporate volunteering, especially volunteering where employees put their individual skills and knowledge at the service of the community;
3. Enhance Third Sector involvement and multi-stakeholder collaboration in program development;
4. Valuing education and awareness as essential vectors for achieving the objectives;
5. Develop programs aimed at local communities in the areas of influence of the production centers, in the distribution concession areas and in the customer communities;
6. Guarantee the integrity and reputation of social investment programs and enhance the recognition of EDPR.

6.4 Implementation instruments

The Social Investment Policy is implemented through projects developed within the scope of the Social Investment Programs that appear in the Social Investment Plans of each EDPR Structure. The operationalization of these instruments and the rules applicable to them are described in the EDPR's Social Investment Management Procedure.

6.5 Communication

The Policy, Social Investment Programs/Projects and respective Results are publicly disclosed, at least, through the websites, publications and reports of EDPR.

For project communication purposes, it is mandatory to use the EDPR logo, as well as the Y.E.S – You Empower Society brand, whose main objective is to communicate in an integrated way the social investment projects developed in the countries where EDPR is present. Projects are classified into 5 main axes: Energy, Planet, Skills, Culture and Community, which fall within the thematic focus of EDPR's social investment strategy.

You can consult the EDP Y.E.S website at [EDP YES | EDP.com](https://www.edp.com) and the definition of the axes and respective sub-axes that make up this brand in the Annex to this Policy.

6.6 Exceptions

Exceptions to the guidelines established in this Policy must be subject to deliberation by EDPR's Management Team.

7. Final provisions

Social & Foundations is responsible for monitoring the application of this Policy, as well as for reviewing it on a biennial basis or whenever there are relevant changes in the applicable legal framework and in the context of the activities carried out by EDPR, and whenever new elements appear that demonstrate its incomplete adequacy, submitting the alteration proposals for the approval of EDPR's Management Team.

Any doubts regarding the interpretation or application of this Policy and associated procedures should be directed to Social & Foundations (sico.edpr@EDP.com), which will provide advice on the most appropriate forms of action.

ANNEX

EDP Y.E.S axes

Y.E.S. To Energy

- ▶ **YES to energy knowledge**
Awareness on sustainable consumption habits that allow reducing the electric bill; security in energy access/distribution
- ▶ **YES to access to energy**
Projects that allow access to energy to communities without electrification (eg A2E)
- ▶ **YES to energy inclusion**
Concrete initiatives to improve the housing conditions of families or institutions to improve energy efficiency
- ▶ **YES to partnerships for innovation**
Exchange of experiences between companies/academies for the promotion and development of technologies and renewable energies
- ▶ **YES to energy for future**
Concrete projects on the implementation of renewable energies – solar, electric mobility, others.

Y.E.S. To Planet

- ▶ **YES to Nature**
Natural heritage conservation initiatives – eg reforestation/plantations, landscape recovery, environment/water courses recovery, awareness-raising initiatives for environmental issues
- ▶ **YES to Wild Life**
Initiatives for the protection and conservation of animal species
- ▶ **YES to Climate Action**
Initiatives that promote knowledge about renewable energies and their contribution to the mitigation of climate change/decarbonization

Y.E.S. To Skills

- ▶ **YES to organizations empowerment**
Projects that contribute to strengthening the management capacities of social organizations/schools
- ▶ **YES to entrepreneurship**
Projects that enhance the development of new companies/creation of new businesses, or skills for entrepreneurship, and consequently the economic development of communities
- ▶ **YES to professional Skills**
Development of particular professional skills in order to acquire skills for employability - scholarships, internships, etc.
- ▶ **YES to Partnerships for sharing**
Sharing of experiences and best practices on issues related to sustainability between companies / organizations
- ▶ **YES to Skills for future**
Initiatives that promote knowledge in several areas not related to energy, climate change, biodiversity or culture. Ex: digital literacy, languages, scientific research

Y.E.S. To Culture

- **YES to cultural heritage**
Initiatives for the promotion/recovery/conservation of material and immaterial cultural heritage: monuments, traditions/customs of communities
- **YES to Music**
Initiatives related to the promotion of musical events: classical music concerts, opera, musical training
- **YES to Arts and Culture**
Various cultural initiatives - exhibitions, museums, artistic recognition awards

Y.E.S. To Community

- **YES to better public spaces**
Projects related to the improvement/construction of infrastructures for the enjoyment of communities - schools' improvement, construction of footpaths, etc
- **YES to emergency relief**
Humanitarian relief initiatives in emergency situations – covid, Ukraine, fires...
- **YES to health**
Initiatives to raise awareness of health issues, donations of equipment/consumables to health institutions
- **YES to community activities**
Various activities that allow involvement with the community
- **YES to social inclusion**
Projects to support the most vulnerable communities, contributing to their sense of belonging