



Procedure for local Stakeholder engagement

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1. VERSION HISTORY

Version	Approval date	Draft	Approval	Comments
1	02/2024	EA&S Corporate Global Unit	Management Team	Initial release
2	07/2025	Regulation, Markets and Stakeholders Management	Management Team	Update due to organizational changes

2. OBJECTIVE

Within the scope of its interactions with various stakeholders, EDP Renewables (hereinafter “EDPR” or the “Company”) has established a Local Stakeholder Engagement Policy, with a focus on Local Communities. This policy ensures overarching principles that align EDPR with society through the adoption of well-defined and transparent rules for all parties.

In this context, the present Procedure aims to establish the rules that ensure effective implementation of the Policy, ensuring that:

- i. All teams representing EDPR must align their behaviour with the ESG commitments undertaken by the Group.*
- ii. All suppliers must follow the same path, in accordance with the sustainability requirements applied across procurement and contracting.*
- iii. It is a goal of EDPR that the entire supply chain commits to this evolution. This Procedure, which stems from the Local Stakeholder Engagement Policy, embodies the methodology for its local-scale application, in the best interest of Community Rights.*
- iv. EDPR’s communication channels reinforce the dissemination and collection of all necessary information to further advance Local Engagement practices.*

3. SCOPE

This Procedure applies to EDP Renewables in all the Regions where it operates.

This Procedure is applicable to the various phases of projects promoted by EDPR, from the construction of new infrastructure to the decommissioning of existing infrastructure, or acquisition and sale at any stage, provided they have an impact on the daily life of the territories and/or local communities.

For projects in non-EU regions, the Stakeholder Manager shall develop region-specific engagement plans (Annex II.4.1) to address local regulatory requirements, community expectations, and cultural nuances, ensuring alignment with EDPR’s ESG commitments.

4. REFERENCES

4.1. Internal references

- a. Code of Ethics;
- b. Integrity Policy;
- c. Stakeholders Relationship Policy and Stakeholders Segmentation Model;
- d. Stakeholders Management Methodology Guide (include Local Stakeholders Engagement Plan);
- e. Human and Labor Rights Policy;
- f. Environmental Policy;
- g. Procedure for Relations with Politically Exposed Persons;
- h. Social Investment Policy;
- i. Supplier Code of Conduct;
- j. “Stakeholders Management – Reputation Survey Action Plan”;
- k. EDPR NA Project Developer’s Guide.
- l. Local Stakeholder Engagement Policy

4.2. External references

- a. OECD (2011), OECD Guidelines for Multinational Enterprises;
- b. Accountability (2015), AA1000 Stakeholder Engagement Standard;
- c. Global Reporting Initiative (2016). GRI 102: General Disclosures;
- d. Corporate Sustainability Report Directive (CSRD);
- e. European Sustainability reporting Standards through EFRAG, European Financial; Reporting Advisory Group;
- f. EU Non-Financial Reporting Directive (NFRD)
- g. Proposal for an EU Directive on corporate sustainability due diligence (entry into force 2024).
- h. CSRD Stakeholder Engagement Reporting Framework: complying with Directive (EU) 2022/2464.

5. TERMS AND DEFINITIONS

DD – Due Diligence;

MT – EDPR Management Team

ESG – Environmental, Social and Governance;

ESIA – Environmental and Social Impact Assessment;

HRA – Human Rights Assessment;

IR&ESG – Investor Relations & ESG;

P,S & EU Affairs – Policy, Stakeholders & European Affairs team;

R,M & S – Regulation, Markets & Stakeholders Management area;

SICO – Social Impact Coordination Office;

SM&A – Strategy and M&A;

Stakeholders – All interested parties who may be affected by the actions, decisions, or outcomes of projects promoted by EDPR.

6. DESCRIPTION AND RESPONSIBILITIES

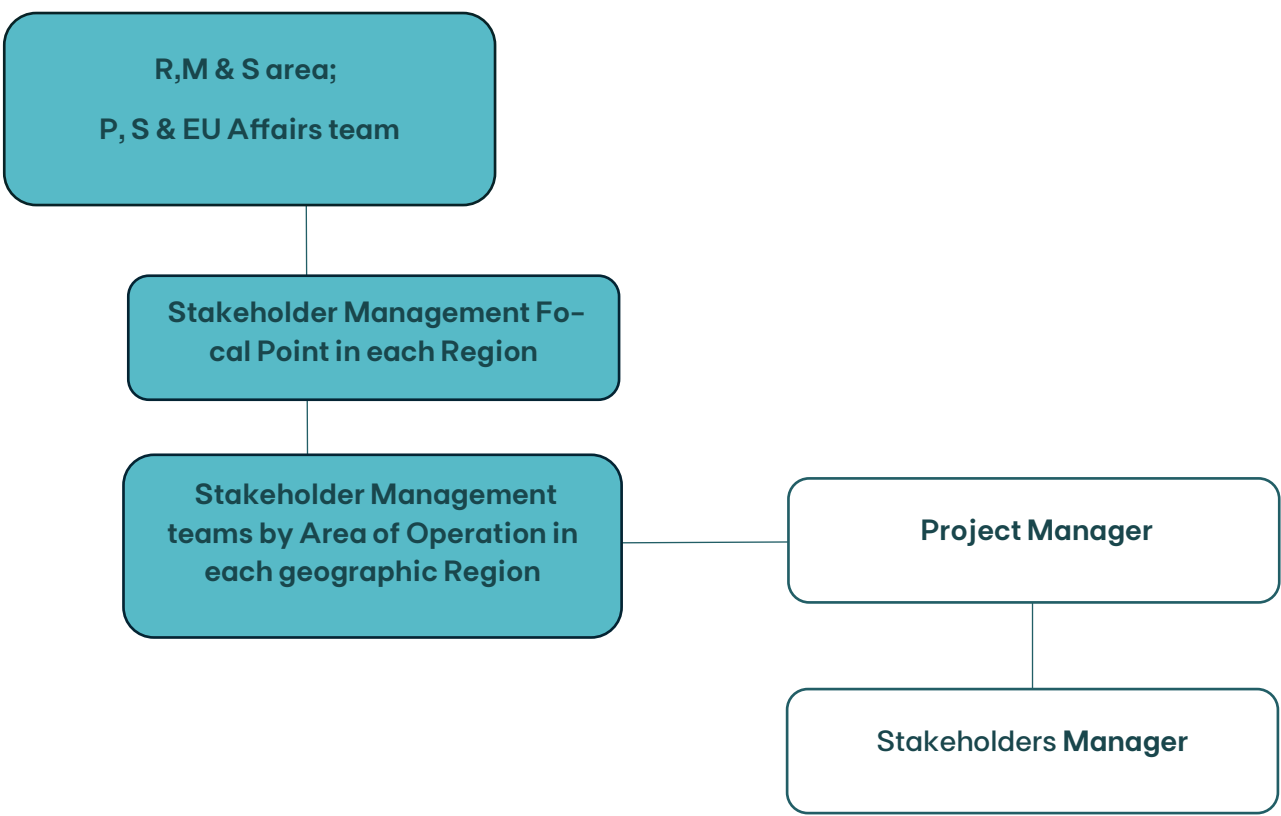
Implementation of the Governance Model

Based on the principles of Stakeholders relationship set out in that Policy, this Procedure replicates and takes them into action, namely: Understanding, by reading the context of each location; Communicating, by recognizing the local voices of the Stakeholders involved; Trusting, by getting to know the characteristics of local Stakeholders; and Collaborating, by establishing a good relationship with all stakeholders, assuring that all actions are driven with transparency , responsibility and acting according to the highest standards of sustainability and ethics.

6.1. Procedure for local stakeholder engagement

Governance model

The complementary governance model defines the integration of local stakeholder engagement into the formal structure of EDPR, with adequate human and financial resources.



The responsibilities assigned to each role are as follows:

- **Project Manager**
 - Responsible for ensuring that DD and ADH are conducted by an independent and qualified third party, and for implementing, coordinating, and monitoring the project's development in compliance with the Stakeholder Relationship Policy, the Stakeholder Management Methodology Guide and the Local Stakeholder Engagement Policy.
 - Also responsible for defining who prepares and implements the Local Stakeholder Engagement Plan (Mapping, Consultation, Action Plan, Monitoring), in accordance with the process outlined in section vi and Annexes II.1 to II.6.
- **Stakeholder Manager:** Appointed by the Project Manager, this person is responsible for defining, implementing, and monitoring the Local Stakeholder Engagement Plan in accordance with EDPR stakeholder methodology and policies. Specifically, the Stakeholder Manager:
 - Analyses community risk benchmarking, previous measures taken, lessons learned, and results obtained.
 - Lists all risks identified in DD, ADH, and initial stakeholder consultations.
 - Analyses key issues raised through interactions with local stakeholders.
 - Proposes the Local Stakeholder Engagement Plan to the Stakeholder Management Focal Point of the respective Region, which is responsible for approving it and determining the frequency of project updates.
 - Keeps the Project Manager informed in accordance with the defined Engagement Plan.
- **Regional Stakeholder Management Focal Points:** These departments coordinate stakeholder management activities across EDPR Regions or Platforms. Their responsibilities include:
 - Notifying the Regulation, Markets and Stakeholders Management by January 30 each year of the projects covered by this Procedure, in accordance with established criteria. The project list may be updated at any time upon proposal.

- Ensuring consistency among the plans of different projects within the BU and compliance with all EDPR procedures.
- Reviewing, approving, and monitoring the implementation of the project’s Local Stakeholder Engagement Plan.
- Determining how often the project team must report on project progress.
- Sharing the Stakeholder Management Plan with the *Regulation, Markets and Stakeholders Management* upon approval and at least semi-annually.

i. *Project Stakeholder Identification (Annex II.1)*

To ensure the success of the project across all its phases, it is essential to identify the key stakeholders involved. This requires the development of a stakeholder mapping framework.

Below are non-exhaustive criteria to support the stakeholder identification process:

Internal Impact	Stakeholders that may have an impact on the company’s capacity to achieve its goals, through actions that impact on its performance (e.g. individuals taking action in Decision processes; NGO, Media)
Proximity	Stakeholders located in or near the project area
External Impact	Stakeholders that are positively or negatively affected by the project
Representation	Stakeholders who represent broader community interests or specific groups
Vulnerability	Stakeholders that are vulnerable due to age, ethnical group, gender, community situation or other like indigenous people ignored by authorities. We’ll also consider the absolute dependency on the project for economical survival as vulnerability.

This identification process is the foundation for effective engagement and must be updated throughout the project lifecycle to reflect changes in stakeholder dynamics.

ii. *Communication for Stakeholder Engagement*

As communication is one of the core principles established by the Stakeholder Relationship Policy, it must be prioritized in the action plan. Before that, it must be culturally understood by the EDPR team, and its relevance and methodology must be clearly conveyed to all teams representing EDPR in the territory, including external representatives.

Key Dimensions of Stakeholder Dialogue to Consider

- **Expectation Management:** From the first interaction, stakeholders must clearly understand when, how, and why their expectations and contributions will be integrated into decision-making processes. Poor expectation management can negatively affect the company’s relationship with stakeholders.
- **Responding and Sharing Information:** Responding to stakeholders is as important as listening to them. The quality of the relationship improves significantly when stakeholders feel heard; otherwise, they may lose interest in engaging constructively. Timely and consistent responses are crucial. In addition to responding, it is also important to proactively share information about the various phases of the project and relevant operations.

The stakeholder communication methodology must, for this purpose, comply with the following:

- Maintain an open communication channel with directly affected stakeholders throughout the duration of relevant operations.
- Disclose available project information in an accessible format and language.
- Communicate objectives and activities in an open and transparent manner.
- Inform stakeholders of key operations in a timely manner to address their concerns.
- Respond promptly to stakeholder questions and inquiries.
- Publish periodic summaries of stakeholder meetings in an appropriate format.
- Publish a report or newsletter summarizing stakeholder engagement.

Annex II.5 contains a table explaining how to produce this report.

Dialogue Tools: In addition to the communication channels already implemented within EDPR (such as EDPR’s corporate website), there may be opportunities to use other tools, such as:

One-on-one in-person meetings	Focus groups	Public sessions	Workshops	Site visits
Flyers/Brochures	Dedicated phone line	Dedicated email address	Letters	Surveys

iii. *Listening to Stakeholders (Annex II.3)*

To understand stakeholders’ positions regarding the project—including their expectations and needs—a representative sample of stakeholders must be consulted in a structured manner. This ensures their input can be meaningfully incorporated into the decision-making process.

When applicable, interactions must be properly documented in accordance with the EDPR Procedure for Engagement with Politically Exposed Persons (PEPs).

Among the various methods for engaging stakeholders, it is advisable to conduct personal, one-on-one interviews with a diverse range of stakeholders. This approach allows the dialogue to be tailored to the specific audience. In addition to interviews, stakeholders may also be consulted through other means, such as:

Stakeholder Consultation Formats:

Personal interviews (preferred) or online interviews	Paper or online questionnaires	Stakeholder committees	Public hearings
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Examples of Key Topics to Address: Stakeholder attitude towards the project; Main advantages and disadvantages of the project; Key affected groups; Procedural aspects of project-related decisions; Evaluation of the relationship between local stakeholders and the company; Local community experiences with similar-scale projects; Measures for project acceptance; Preferred communication channels with communities; Regulatory and legal challenges.

At the end of the consultation process, stakeholder expectations must be carefully analysed and, where appropriate, integrated into decision-making processes.

iv. *Stakeholder Profiling (Annex II.2)*

After listening to stakeholders and gaining a detailed understanding of their positions and expectations regarding the project, stakeholders should be segmented and prioritized based on the information collected. This allows for the development of engagement approaches tailored to their specific profiles.

The analysis and processing of the gathered information will enable the creation of a stakeholder positioning table, identifying typical profiles aligned with how respondents perceive the project. Identifying and segmenting these profiles allows for the development of structured and effective responses that correspond to their varying positions on the project.

Criteria for Stakeholder Segmentation:

- Position regarding the project
- Ability to implement best practices in operations
- Ability to influence other stakeholders to adopt best practices
- Visibility in media and communities
- Impact of operations on stakeholders and vice versa

Energy Transition Engagement:

The Stakeholder Manager shall prioritize consultation on low-carbon technologies (e.g., solar, wind, energy storage) to promote community acceptance and address barriers like low power prices or environmental concerns. Key topics include grid reliability, local economic benefits, and renewable energy education.

Information to Include in Stakeholder Profile Tables:

Stakeholders name	Local presence	Segment to which they belong
Relevant topics, including risks	Stakeholder’s position on the project	Implementation of best practices
Stakeholder visibility and media profile	Contact information	Other relevant information

v. *Structure of the Local Stakeholder Engagement Plan (Annex II.4)*

Local stakeholder engagement must be considered from the beginning of the project, with appropriate human resources and budget requirements. Stakeholder departments must be involved in project decisions and support project managers in stakeholder relations.

It is essential to develop a Local Stakeholder Engagement Plan that includes both mandatory and voluntary measures, as well as clear and coherent responses to stakeholder expectations and needs. The plan should promote proximity, reliable communication, and the creation of shared value through collaboration. All proposed measures must be accompanied by deadlines for their implementation or fulfilment.

The plan must be reviewed whenever justified by strategic changes or shifts in stakeholder positions, considering the initial assessment.

Types of Measures:

- **Mandatory Measures:** Initiatives aimed at engaging stakeholders to offset the project’s impact, in compliance with EDP’s legal or regulatory obligations or previously assumed commitments.
- **Voluntary Measures:** Each region must create a Catalogue of Initiatives to serve as a basis for negotiating all actions to be discussed with project stakeholders.

Engagement Approaches: Actions should be categorized by their nature (e.g., information, consultation, partnership, or other) and have a clear implementation timeline.

- **Information Flow:** Disseminate project information to keep all stakeholders updated.
- **Consultation Actions:** Identify perceptions and expectations and keep the Project Manager informed.
- **Partnerships:** Build consensus in divergent situations, incorporate perceptions and expectations into decision-making or negotiation processes.

Minimum Information Required in the Plan:

Stakeholder mapping	Stakeholder segments	Analysis and sharing of consultation results	Engagement objectives
Mandatory and voluntary measures	Actions and their nature	Deadlines	Communication channels to be used and developed
Responsible parties for execution, monitoring, and reporting	Expected outcomes	KPIs	Commitment to periodic reporting

Annex II.4 includes a table to support stakeholder engagement throughout the project.

vi. *Monitoring and Reporting (Annex II.6)*

All stakeholder engagement initiatives must be accompanied by indicators to monitor their success. The Project Manager is responsible for this monitoring. These indicators should allow for the evaluation of the initiatives’ impact on the community, and their results must also be tracked.

Indicators Types:

- **Process Indicators:** Inputs, compliance.

- **Performance Indicators:** Assess outcomes based on the resources invested by the company (e.g., improvement in education levels due to EDPR-supported initiatives; increase in entrepreneurship or civic associations).
- **Satisfaction Indicators:** Measure the extent to which stakeholders are satisfied with the project and the implemented measures.
- **Impact Indicators:** Evaluate short- and medium-term changes in people and organizations resulting from the company's activities. These indicators monitor the success of the initiatives, such as added value for stakeholders or the number of direct and indirect jobs created. They may be subdivided into: (i) Impact of EDPR's actions on stakeholders; (ii) Impact of identified stakeholders on the territory (quantity and quality). Examples: average hours of learning per person, assistance hours, educational and entertainment hours, new jobs created, published studies, waste removed, natural area restored, trees planted, protected species individuals, renewable energy installed, energy savings, approved adaptation plans. A field for "others" should be included to allow open evaluation of additional options.

Tools for Collecting Indicators:

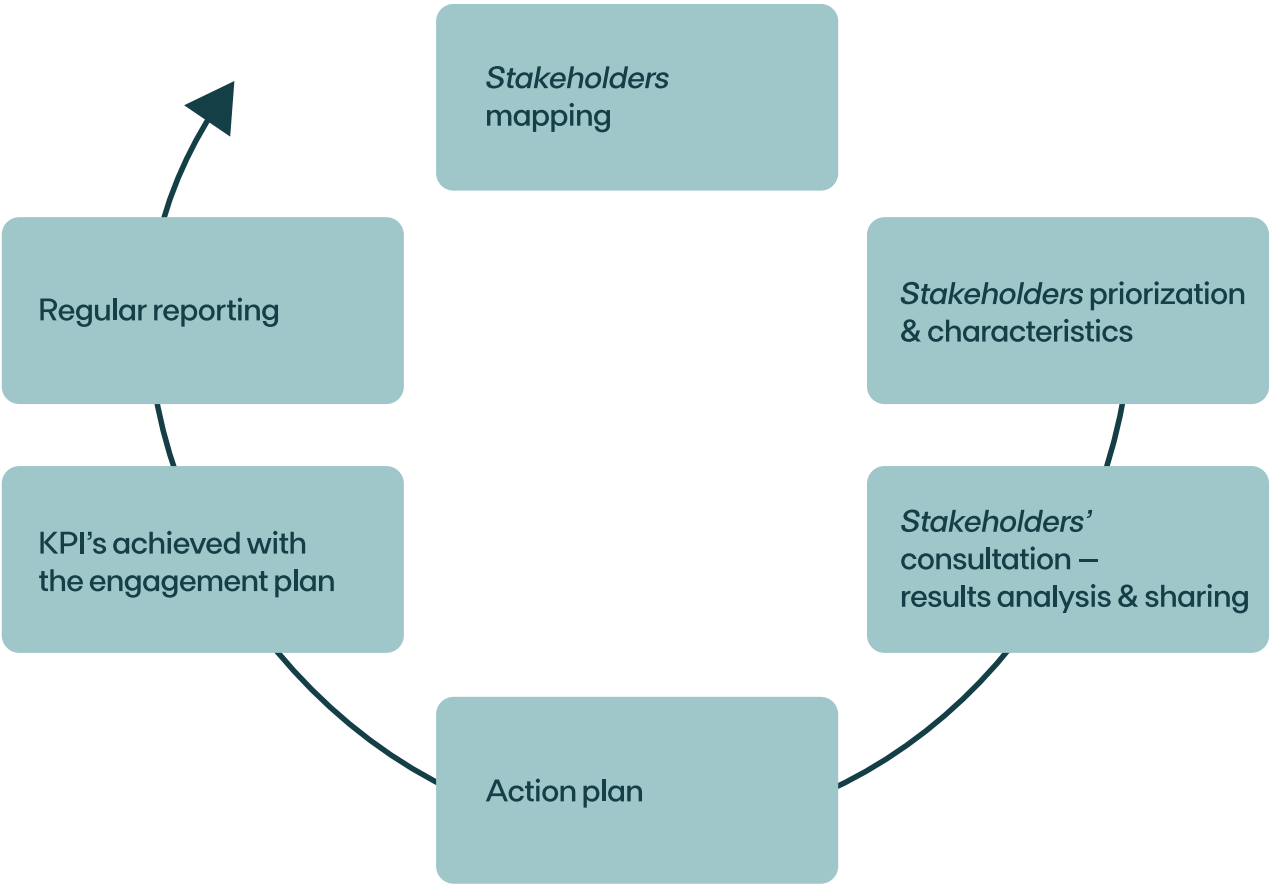
- (i) Evaluation surveys (in-person or online);
- (ii) Data collection from beneficiary entities;
- (iii) Observation and recording.

The Project team reporting to the Stakeholder Management at R,M & S must occur at least on a semi-annual basis. However, the Regional Stakeholder Management Focal Points may define a different reporting frequency for each project (e.g., annually, quarterly), based on the following criteria:

- Capex project classification.
- Number of stakeholders affected.
- Social investment (reported via the WAVE platform at SICO).
- Other criteria (to be defined locally).

During the initial structuring of the process, the agreed reporting frequency must be recorded and communicated to the Project Manager, their respective stakeholder management Focal Point, and the Regulation, Markets and Stakeholders Management department.

The Stakeholders' Management Focal Points must receive this information from Project Managers:



Once the engagement and reporting plan is approved, it must be implemented according to the original schedule. Reports (or other specified documents) must be fully compliant with the approved plan and will only be considered complete if all required baseline information is provided.

Each Project Manager must submit timely reports to the Stakeholder Management Focal Point of its Region to support project development and implementation. In turn, the Stakeholder Management Focal Point must submit annual (or periodic) reports to the Regulation, Markets and Stakeholders Management department, thereby also safeguarding EDPR's reputation.

This reporting sequence must also be followed in unforeseen situations, such as unexpected issues or early resolutions.

CSRD-Compliant Reporting

The Stakeholder Manager shall prepare annual stakeholder engagement data for the R,M&S reporting using the CSRD Framework, including:

- Double materiality assessment results identifying stakeholder priorities and ESG impacts.
- KPIs aligned with energy sector standards (e.g., % stakeholder alignment with net-zero goals, community investment ROI).
- Disclosure of engagement outcomes in accessible formats for EU regulatory submissions by Q1 annually.

vii. Establishment of a Grievance Mechanism

Without prejudice to the EDPR Speak-Up Channel¹ —which is available to all employees, customers, suppliers, and other stakeholders to report misconduct and/or ethical concerns, regulatory violations (internal or external), and issues covered by Law No. 93/2021 of December 20 (or any other legislation transposing Directive (EU) 2019/1937)—local dialogue procedures must be established to ensure that all project-related complaints are handled consistently and with protection against any form of retaliation.

Process Definition

- Stakeholders are encouraged to first attempt to resolve their concerns directly with their primary point of contact within the project team.
- If the issue remains unresolved, the stakeholder should submit a formal written complaint to the Regional Stakeholder Manager Focal Point. Should the stakeholder remain dissatisfied with the response, the matter may be escalated to the Director of Corporate Stakeholder Management (Regulation, Markets, and Stakeholders Management Department).
- The complaint should include a clear description of the issue, identification of the parties involved, a summary of actions taken and outcomes to date, and a proposed resolution. EDPR teams must be prepared to request this information upon initial contact to facilitate a timely response and mitigate potential risks. A written acknowledgment of receipt must be issued to the stakeholder within one week, along with a commitment to provide a final response within a month.
- The relevant EDPR team is responsible for assessing the likelihood and potential impact of the issue and for addressing it with appropriate urgency.
- If the case is escalated to the Corporate Stakeholder Management (Holding) level, this body will determine whether the issue can be resolved internally. If not, the matter must be formally submitted by the Regulation, Markets, and Stakeholders Management Department to EDPR Management Team.
- The Corporate Stakeholder Management lead must communicate the final resolution in writing within 30 days from the date the Regional Stakeholder Manager received the complaint.

¹ EDPR has this channel available for all workers, clients, suppliers and other stakeholders, so they can report any misbehavior or ethical doubts, regulatory inconveniences, internal or external, as all questions provided through the Portuguese law 93/2021 from December 20th (or any other relevant legislation that should transpose the EU directive (UE)2019/1937). Any grievance applicable through this scope and that any other channel should identify, must be forwarded to the SpeakUp Channel.

6.2. Action Plan According to Project Phase

6.2.1. Different Approaches by Project Phase (Summary Table)

Concept	
Refer to prior Stakeholders consultation or information	Presentation of the project to key Stakeholders
Planning/licensing	
Map and identify main Stakeholders and involve them in Social, Human Rights and Environmental Impact Studies*	Develop a Local Stakeholders Engagement Plan and define compensation measures
Construction	
Monitor the project evolution and keep affected Stakeholders informed	
Operation	
Continue to disclose, consult and report information to Stakeholders	Ensure integration of continuous commitments with Stakeholders in operations management systems
Decommissioning	
Consult Stakeholders on the decommissioning process and develop social and environmental impact mitigation and monitoring measures	

* The Environmental and Social Impact Studies must follow each phase and be reviewed whenever there is a change or evolution in the project.

6.2.2. Project Phases

i. Action Plan According to Project Phase

This phase begins when the EDPR team initiates first contact with project stakeholders. It is characterized by the emergence of the project idea. Presenting EDPR’s objectives to stakeholders early on and incorporating their perspectives into the project definition can help avoid feasibility constraints in later phases.

a. Preliminary Stakeholder Consultation and Information Gathering

If the project is an expansion of a previous investment or operation, the following should be reviewed:

- Existing stakeholder databases
- Records of previous consultations and complaints
- Completed Human Rights Assessments (ADH) or Due Diligence (DD)
- Environmental and Social Impact Assessments (ESIA) from earlier phases.
- Annual environmental monitoring reports
- Community investment plans
- Reports and plans from regulatory authorities or development agencies identifying stakeholders and their interests.

Before any investment, relevant reports and plans identifying the project’s stakeholders and their interests, published by regulatory authorities or other public and international development agencies, should be reviewed.

b. Selective Early-Stage Consultation

During strategic scenario evaluation, public disclosure must be handled cautiously to avoid raising unrealistic expectations, fears, or speculative behavior. However, early engagement can help identify critical issues and build relationships. Priority stakeholder groups should be consulted on potentially sensitive information.

Topics to Be Communicated During Initial Engagements with Communities:



c. Share Information on Project Alternatives and/or Potential Sites

It is advisable to prepare information for the selective consultation of stakeholders: different options should be explained, including the no-project scenario, and what each option would mean for the various stakeholder groups. It is important to demonstrate to the public and project stakeholders that different sites, approaches, and alternatives are being analysed and considered in response to raised concerns. Where applicable, local stakeholders may participate in the site selection or project design options process.

d. Engage Public Decision-Makers During Strategic Planning

In some cases, strategic decisions regarding location, scale, or other project components are determined by entities external to EDPR. These processes may involve stakeholder engagement at various levels. Engaging with the relevant public authorities presents an opportunity for them to be part of the decision-making process and enhances the quality of the consultations they conduct.

e. Review Regulatory or Legal Requirements for Stakeholder Engagement

It is important to compare formal and informal principles of consultation, transparency, and information sharing with those required by regulatory bodies to ensure that stakeholder engagement activities meet all necessary obligations.

f. Ensure Risk Analysis Includes Stakeholder Concerns

Conceptual risk analyses should reflect and categorize potential environmental, political, and social risks raised by project stakeholders. It is essential that planning considers the initial positions of key local stakeholders and ensures they feel included in the consultation process.

g. Consider Establishing a Stakeholder Forum

The suitability of convening a forum of local and regional representatives (e.g., government authorities, civil society organizations, community leaders, technical experts) should be assessed for projects or financial investments with significant regional and community impacts. These forums should meet periodically to evaluate different project design options. The size and composition of the Stakeholder Forum can be adapted to the scale and profile of the project. Participants should be selected in collaboration with stakeholders, be reliable, representative, and have effective communication channels with those they represent. They should also be involved in defining the forum’s objectives and operational terms.

ii. Planning and Permitting Phase

This phase is characterized by the most intensive stakeholder engagement activities. It is during this stage that decisions are made on whether and how the project will proceed. Therefore, stakeholder support is essential for implementation.

a. Map Project Stakeholders and their Interests

As the project design evolves from its original concept to the final design, it is important to engage stakeholders more systematically—both to inform them about Environmental and Social Impact Assessments (ESIA) and to gather input for other feasibility studies and risk analyses. Therefore, identifying and mapping project stakeholders and their interests as early as possible is a priority.

b. Engage Stakeholders in Environmental and Social Impact Studies/Assessments (ESIA)

Each project has its own identity from the Group's perspective. It is EDPR's responsibility to engage stakeholders in this concept, informing them in advance about what is happening in their area. In conducting Environmental and Social Impact Studies, identifying project impacts and risks can be facilitated through stakeholder involvement. Consulting stakeholders on key issues is a fundamental tool for identifying weaknesses and is a best practice that complements prior internal research and assessments. This engagement highlights shared values among stakeholders, what unites them regarding the territory, and what they collectively wish to protect—fostering a sense of shared purpose and belonging.

Maintaining an active, close relationship promotes open dialogue and a better understanding of stakeholder needs, respecting local culture and contributing to improved living conditions for local communities.

c. Gather Stakeholder Input on Preferred Consultation Methods

Best practices suggest asking different stakeholder groups how they would like to be consulted, including the type of information they wish to receive, in what formats, at what times, and the most suitable frequency and locations to meet their needs.

d. Prepare a Stakeholder Engagement and Impact Mitigation Plan

This plan should guide stakeholder consultation and communication during the main impact assessment period, as well as other aspects of project analysis and design. It should be updated following the impact studies (ESIA and HIA) to provide a roadmap for engagement in monitoring mitigation measures (including methodologies and implementation timelines).

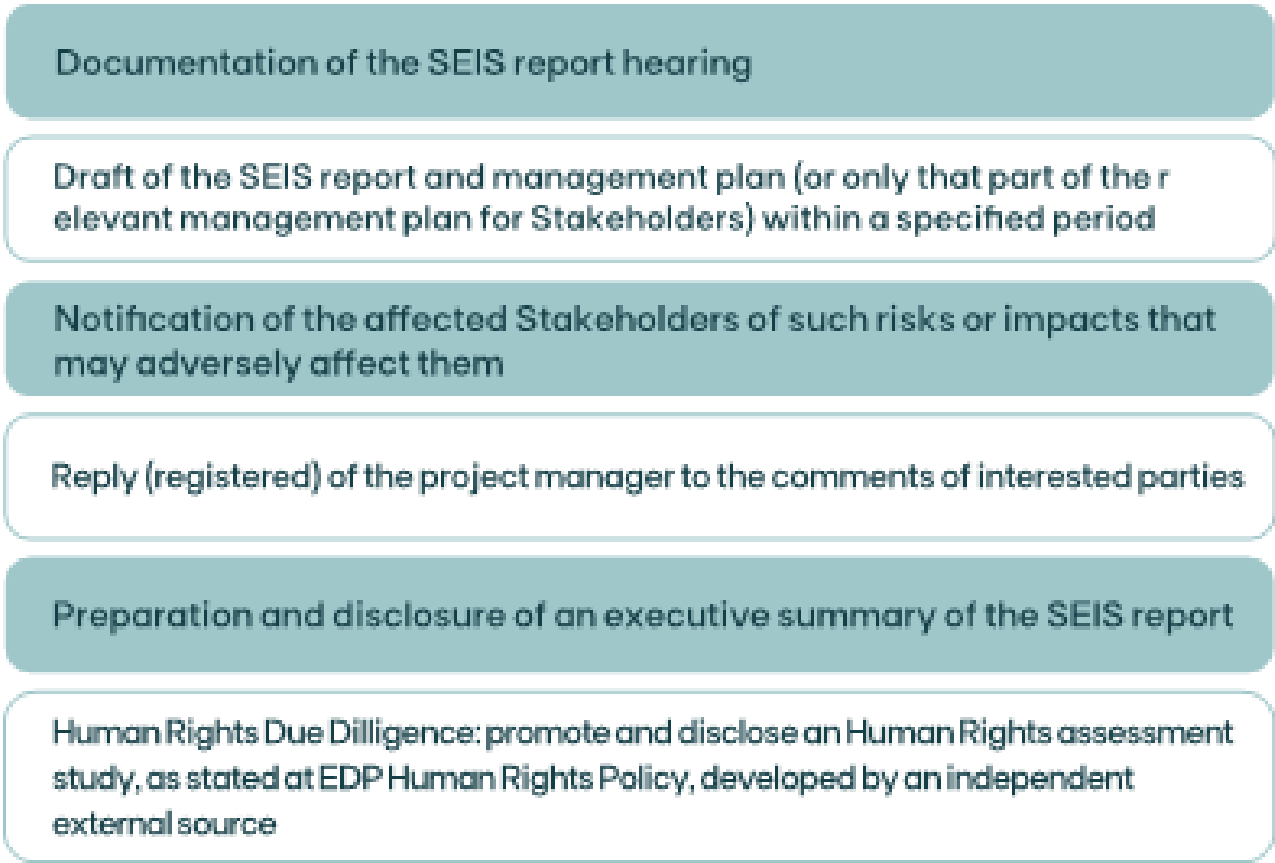
e. Pre-Consultation Activities for Environmental and Social Impact Surveys

Before consulting stakeholders on the project's environmental or social impacts, easily understandable information should be prepared, including:

- A general description of the project and its main objectives, including location and timeline of key events: construction phase, peak operational activity, decommissioning.
- A detailed description of the project in relation to consultation and stakeholder engagement topics.
- An outline of the environmental and social impacts to be assessed during the consultation, along with any preliminary findings or forecasts.
- Existing proposals for mitigation measures.

f. Implement best practices that meet the requirements of Environmental and Social Impact Studies (ESIS), Environmental and Social Impact Assessments (ESIA), and Human Rights Due Diligence (HRDD) during consultations.

Although legal requirements for stakeholder disclosure and consultation vary across jurisdictions, EDPR proposes the disclosure of the following:



In addition to the minimum requirements for stakeholder engagement, other best practices related to the formal ESIA (Environmental and Social Impact Assessment) consultation process should be considered. These measures help ensure that stakeholders are genuinely integrated into the ESIA process and can contribute to the implementation of improved practices in project design. Best practices may include:

- Disclosure of meaningful project information prior to the start of stakeholder consultation.
- Consultation to provide input on the scope of impacts to be included in the ESIA Terms of Reference.
- Collaboration with stakeholders in identifying data and indicators to be collected and in the subsequent analysis of results.
- Review and revision of proposed mitigation measures and benefits prior to the publication of the ESIA report.
- Disclosure of the Environmental and Social Management Plan (ESMP).
- Ongoing consultation to monitor impacts, risks, and the effectiveness of mitigation and compensation measures.

g. Use Consultation to Improve Mitigation Measures and Benefits

Consultation can be used to broaden and discuss the range of available options to eliminate, compensate for, or reduce potential adverse social and environmental impacts. The local knowledge of directly affected stakeholders, combined with the innovation and experience of many non-governmental organizations and the scientific community, helps enhance the effectiveness of mitigation measures. Consultation is also a key tool for reaching agreements with affected stakeholders on acceptable compensation measures and for designing culturally appropriate benefit-sharing programs.

h. Participate in Consultations Led by Public Authorities

It is important to be aware that hearings conducted by government or local authorities may influence future stakeholder relationships with EDPR. It is therefore recommended that, whenever possible and when an EDPR project is involved, EDPR should take part in the consultation process conducted by the public authorities.

i. Improving the level of Stakeholders support for the project

There may be situations in which, despite EDPR’s best efforts to reduce negative impacts and demonstrate net benefits for local Stakeholders, the project remains controversial, and not all Stakeholders groups support it. The key question to be asked in the early stages of planning is if there is sufficient support from local Stakeholders to proceed to the construction phase. The answers to the following questions serve as a guide for decision-making:

- Is there satisfaction with the way in which Stakeholders have been consulted and informed to date?
- Do Stakeholders have any concerns that have not been resolved to date and that pose any kind of risk to the project?
- Do the Stakeholders have any material objections to the project that government authorities can take into account when approving the project for environmental, social or economic development reasons?
- If there are any objections, do they have a solution? Do the objections relate to the very concept of the project?
- If dissatisfaction exists, how widespread is it? Is the opposition local or from outside the project area? Does the majority of the local population support the project?

j. Facilitate Contact Between Local Stakeholders and the Stakeholder Management Team

Contact between local stakeholders and the stakeholder management team should be facilitated regardless of the project's scale. Stakeholders should know who to contact, how and where to reach them, and what type of response they can expect if they have ongoing questions or concerns.

k. Review Previous Hearings to Identify Long-Standing Grievances

Stakeholders who have been consulted by third parties—whether EDPR was involved—deserve special attention. It is important to understand whether significant grievances exist, and in cases where there is evidence of persistent complaints, it may be necessary to work with the third party to address outstanding concerns, within legal boundaries and considering the impact on relationships between those third parties and other stakeholders.

l. Communicate Project Detail Changes to Stakeholders

As various feasibility studies and environmental and social impact assessments progress and project details evolve, stakeholders should be periodically updated. This can be done through newsletters delivered to households, other accessible communication channels for the local population, or through identified and recognized stakeholder representatives.

m. Monitor the Implementation of All Studies (ESIA and HIA) or Work Performed by Contractors and Remain Involved in the Process

Where possible, the project's stakeholder manager should monitor the studies and externally conducted work throughout their various phases, with particular attention to stakeholder engagement.

This helps build long-term relationships between EDPR and project stakeholders, reduces the risk of misunderstandings with third parties when consultants are independent contractors, and ensures that the EDPR team gains first-hand knowledge of the issues and ownership of the mitigation measures recommended in consultant reports.

n. Integrate Stakeholder Data into Project Planning Functions

Much of stakeholder engagement management is aimed at ensuring that the information gathered during consultations is reflected in other aspects of project planning, including risk assessment, design and engineering, health and safety planning, external communications, and financial and labour planning.

It is best practice for ESIA teams to meet regularly with project engineers during the planning phase. This allows impact mitigation suggestions or design changes to be evaluated and either incorporated or rejected with a clear rationale communicated in a timely manner to relevant stakeholders. Similarly, stakeholder concerns that represent risks to the project must be communicated to those conducting risk assessments and prioritized in traditional political, regulatory, and economic domains.

iii. Construction Phase

Stakeholder engagement during the construction phase is centred on territorial transformation activities aimed at the physical implementation of the project. This is the phase with the greatest physical impact and potential disruptions, and it is a major concern for stakeholders who begin to perceive the real changes in their territory.

The way stakeholders are engaged during this phase—and how their concerns are addressed—will define the relationship between EDPR and its stakeholders during the subsequent operational phase. Therefore, it is

essential to establish an open communication channel with stakeholders, monitor project progress, and keep key affected stakeholders informed.

a. Identify Stakeholders Most Likely to Be Affected by Construction

Once the project's planning and permitting phase is complete, it becomes clearer which stakeholder groups will be affected by the various construction activities and when. Stakeholder information previously collected during the ESIA process should be reviewed to ensure that all those potentially impacted by the upcoming construction have been identified and that their concerns are prioritized. The initial steps should therefore include mapping and prioritizing key stakeholders, as well as reviewing and initiating the implementation of the social action plan for the area.

b. Select Construction Companies Capable of Effectively Communicating with Stakeholders

At this stage, contractors and subcontractors are heavily involved and are often the primary point of contact with local stakeholders. The quality of their interactions with affected communities, local leaders, and other authorities directly influences project development and its reputational impact. Therefore, it is essential that expectations regarding stakeholder engagement, relationship management, and social performance are clearly defined in the pre-selection criteria for these companies.

A contractor aligned with EDPR's ESG commitments and experienced in managing stakeholder demands and concerns should be selected. This ensures conduct in line with EDPR's Code of Ethics. It is common for these companies to appoint their own local stakeholder manager, and it is the project team's responsibility to maintain open and constructive communication with this liaison. On-site monitoring of this relationship is advisable.

c. Notify Local Stakeholders of Construction Activities and Any Schedule Changes

Noise, dust, vibration, traffic, and lighting associated with construction can cause disruption and emotional stress, as well as pose physical or health risks to communities living near the project site. Whether the works are large-scale or minor, it is best practice to inform affected stakeholders in advance about the following:

- Purpose and nature of the construction activities.
- Start date and expected duration of the works.
- Potential impacts of the activities.
- Contact information and procedures for raising concerns or complaints related to construction.

There are various methods for communicating this information, including roadside signage, public posters, newsletters, door-to-door leaflets, stakeholder representatives, or public meetings.

d. Ensure the Stakeholder Manager Is Present On-Site Before Construction Begins

At this stage of the project, it is important to ensure the presence of the Stakeholder Manager before construction starts. The construction phase carries a high risk of potential negative impacts and may generate a significant number of complaints.

It is therefore good practice for the project and construction teams to visit local stakeholders prior to the start of construction, adopting a proactive approach to information sharing and a willingness to respond to stakeholder questions. Once construction begins, the stakeholder management team must remain accessible to affected communities. This entire process should be as visible as possible.

e. Ensure Rapid Response Times for Handling Complaints

The construction phase often serves as the true test of the effectiveness of the grievance mechanism. Since construction activities are typically fast paced, with material and human resources mobilized and schedules frequently adjusted at short notice, responses to complaints must be equally swift and effective.

The stakeholder management team should be on-site, in continuous dialogue with stakeholders, and actively resolving key constraints and complaints. This team should also keep the project team informed of major stakeholder concerns and collaborate on adjusting the construction schedule when necessary. The project team must be prepared for an increase in the volume of complaints during this phase and, for larger projects, should be ready to allocate additional resources as needed.

f. Communicate Progress on Environmental and Social Programs to Stakeholders

The operation phase is the longest stage in the project lifecycle, and it is normal for stakeholders or their representatives to change over time. However, as in previous phases, there should be regular contact between the project team and stakeholders. Ongoing and attentive monitoring of stakeholder concerns will help identify emerging critical issues and prevent disruptions in stakeholder relations.

iv. **Operation Phase**

The Active Operation Phase is the longest phase on the project’s life cycle. It’s understandable that stakeholders or their representatives, should change during the life cycle of an active. Nevertheless, as in previous phases, a regular contact must be established between the project team and those Stakeholders. An attentive and regular monitoring of Stakeholder’s worries will provide for the early identification of critical questions that may arise, and therefore avoid disruption in the parts’ relationship.

a. Manage the Transition from Construction to Operation

During the transition from construction to operation, there is a risk of losing the relationship between the project team and stakeholders. Therefore, concerted efforts must be made to ensure continuity. In the event of a change in point of contact, knowledge transfer to the new contact person must be ensured, and stakeholders must be properly informed of the change.

This transition period is often marked by uncertainty for residents, so any changes they should expect—and the potential impacts of those changes—must be communicated to them in a timely and appropriate manner.

b. Periodically Review and Update the Stakeholder Map

It is important to periodically review and update the stakeholder register to ensure that social and environmental measures are being fully implemented—especially if there are significant changes in the external environment that may lead to the emergence of new stakeholders or stakeholder groups, or changes in the influence or impact of existing ones. Reassessment may be triggered by factors such as:

- National or local elections that shift stakeholder attitudes.
- Adverse socioeconomic trends, natural disasters, or other events not caused by the project, but which may exacerbate the impact of operations on stakeholders.
- Approval of local development plans that promote the establishment of new industries in the same geographic area, potentially contributing to cumulative impacts and stakeholder concerns.

c. Continue Disclosing, Consulting, and Communicating with Stakeholders

Ongoing disclosure of project-related information to stakeholders—as well as the nature and frequency of consultation and communication activities during operations—should be proportional to the scale of impacts and stakeholder concerns. Maintaining an open communication channel with key stakeholders is essential, ensuring they are informed whenever necessary.

Where possible, Stakeholder engagement activities should continue, particularly on topics such as:

- Monitoring the Environmental and Social Impact Studies and other commitments
- Changes over the project conception or operational procedures, that may have impact in any Stakeholder groups
- Any unforeseen impacts or developments
- Annual maintenance procedures and emergency response plans
- Impact over local infrastructures or access to services (e.g. road access, households, education, public services, etc)
- Aesthetical changes and Landscape quality

d. Ensure Integration of Ongoing Stakeholder Commitments into Operational Management Systems

Maintaining continuity in stakeholder commitments during the transition to operations is critical for preserving credibility, especially if the project team has changed. Before initiating the transition, it is necessary to identify how to integrate outstanding commitments and benefits into existing functions to ensure they are fulfilled. For example: environmental protection and pollution reduction commitments may need to be incorporated into new or existing environmental management systems; labor standards commitments can be integrated into the human resources function; and local economic benefit commitments can be embedded within the procurement function.

e. Periodically Communicate Emergency Preparedness and Response Plans

Over time, awareness, understanding of response plans, and clarity of roles and responsibilities during emergencies may diminish among potentially affected stakeholder groups—such as employees, public authorities, and local communities—thereby increasing the potential consequences of a serious incident. Stakeholder engagement during operations should be designed to maintain awareness levels, for example, through regular drills and simulation exercises involving communities, or by jointly reviewing and updating existing emergency response procedures.

For projects with the potential to cause public emergencies—such as explosions, spills, or floods—effective response and management by EDPR should ensure:

- Vigilance and behaviour among the local population that help reduce the risk of serious incidents.
- That all potentially affected stakeholders have a basic understanding of the risks involved and the key elements of the emergency response plan.
- That individuals both inside and outside the project understand their roles and responsibilities during an emergency. Companies new to developing Emergency Preparedness and Response Plans should allocate adequate resources to this task, as well as to ongoing training and awareness activities to ensure effectiveness.

f. Maintain an Operational Grievance Mechanism

Following the construction phase, the volume of complaints is likely to decrease—either because previously raised issues have been resolved or because the “peak impact period” has passed. While this may justify a reduction in the resources allocated to daily grievance management, a functional and clearly defined procedure must remain in place to receive and address local concerns throughout the project’s operational life.

g. Consider Third-Party or Contractor-Led Monitoring Programs

Inviting external entities to participate in monitoring EDPR’s performance can enhance the credibility and accountability of the monitoring program and the project. Interested stakeholders may participate in scientific sampling, observations, focus groups, and assessments of environmental or socioeconomic changes over time.

The benefits of third-party monitoring include increased transparency and trust between EDPR and stakeholders, as well as an objective evaluation of environmental and social performance.

v. Decommissioning Phase²

The decommissioning phase involves significant social, human, and territorial management concerns. It also presents reputational risks that require a high level of corporate diplomacy and must not overlook the local context.

EDPR must go beyond simple negotiation or the justification that its sustainability evolution warrants the decommissioning of a project. It must commit to understanding, communicating, building trust, and cooperating. This involves engaging with the various stakeholders in the territory who once hosted the company and are now preparing to live without it.

Stakeholders potentially affected by decommissioning decisions—and the ways in which they are affected—will differ significantly from those in the early stages of the project. Impacts such as local job losses, regional

² Should there be an asset rotation operation, a previous local plan should be defined, including voluntary and compulsory mitigation measures. The early communication is baseline to avoid future crisis with local stakeholders.

economic decline, discontinuation of services previously provided by the company to communities, and the dissolution of local community involvement in monitoring social and environmental impacts can result in long-term financial and reputational losses for the company.

a. Review Stakeholder Maps in Line with the Decommissioning Objective

The decommissioning process introduces a range of new risks and opportunities, as stakeholders and their interests may differ from those identified at the beginning of the project. Therefore, at this stage of the asset lifecycle, it is essential to review and update the previously developed stakeholder map, adding or removing stakeholders as necessary.

b. Engage with Stakeholders at the Early Stage of the Process

Effective stakeholder relationship management during a change process requires timely, clear, and consistent communication with employees, suppliers, and other stakeholders. Whenever possible, information should be provided regarding:

The purpose, timing and nature of the changes that are going to take place

The specific environmental and socio-economic consequences for each Stakeholders group

The ways in which each stakeholders group can participate in planning, implementation and monitoring

It is also essential that stakeholders receive regular updates on the process. Therefore, reports should be prepared for the affected stakeholders, aligned with the escalation of potential environmental and socio-economic impacts or risks. Issues of greatest concern to stakeholders should be prioritized in communications.

c. Organize Stakeholder Hearings

The decommissioning phase is a time when the company must present a new set of proposals that may affect people's lives, making it important to introduce mitigation and compensation measures.

To understand the main concerns of stakeholders at this stage of the asset lifecycle, it is essential to conduct stakeholder engagement activities, such as local meetings and consultations, to identify the context and needs. Listening to affected stakeholders at this stage should follow principles like those applied during the project planning/licensing phase. A social action plan should be implemented, which may include, for example:

- Support for vulnerable groups.
- Social investment initiatives.
- Reskilling and training programs.
- Partnerships for job creation.

d. Consultation on the Transfer and Management of Assets and Liabilities

The transfer of assets and liabilities involves significant risks and must be managed responsibly. There are various strategies and approaches for handling the transfer of physical assets and liabilities, and affected stakeholders should be consulted on the available options and their implications. Their involvement is important not only because they may play a role in future management or monitoring, but also because they will have to live with the consequences of such decisions.

e. Grievance Management

Public awareness that facilities may be closing or undergoing decommissioning can prompt local stakeholders to raise a variety of grievances, which companies must be prepared to manage as part of the process (e.g., scheduling meetings with partners, defining communication channels, and reporting mechanisms). These grievances may include concerns about inadequate compensation, unfulfilled commitments to community development, environmental responsibilities, or apprehensions about future relationships with new asset owners. Therefore, it is important to support the development of measures that ensure continuity of social programs. Stakeholders may also question the company's current environmental and social performance and raise concerns about its future capacity to manage impacts, especially when such impacts fall outside the direct control of the company. As in previous phases, the same best practice principles for grievance handling apply.

f. Assess Future Stakeholder Management Capacity for Decommissioned Assets

The decommissioning process leads to changes in management or ownership structures and systems. In some cases, even after decommissioning is complete, the project company may choose to retain responsibility for managing certain risks and liabilities—for example, continued monitoring of environmental risks. For projects with high environmental and social impacts associated with decommissioning, it is advisable to review the stakeholder management procedures in place to ensure that ongoing stakeholder engagement commitments are upheld after the decommissioning process concludes.

7. FINAL PROVISIONS

This Procedure shall take effect from the date of its approval by the EDPR Management Team.

The Regulation, Markets and Stakeholders Management department is responsible for reviewing and updating this Procedure, and revision proposals should be submitted whenever deemed appropriate.

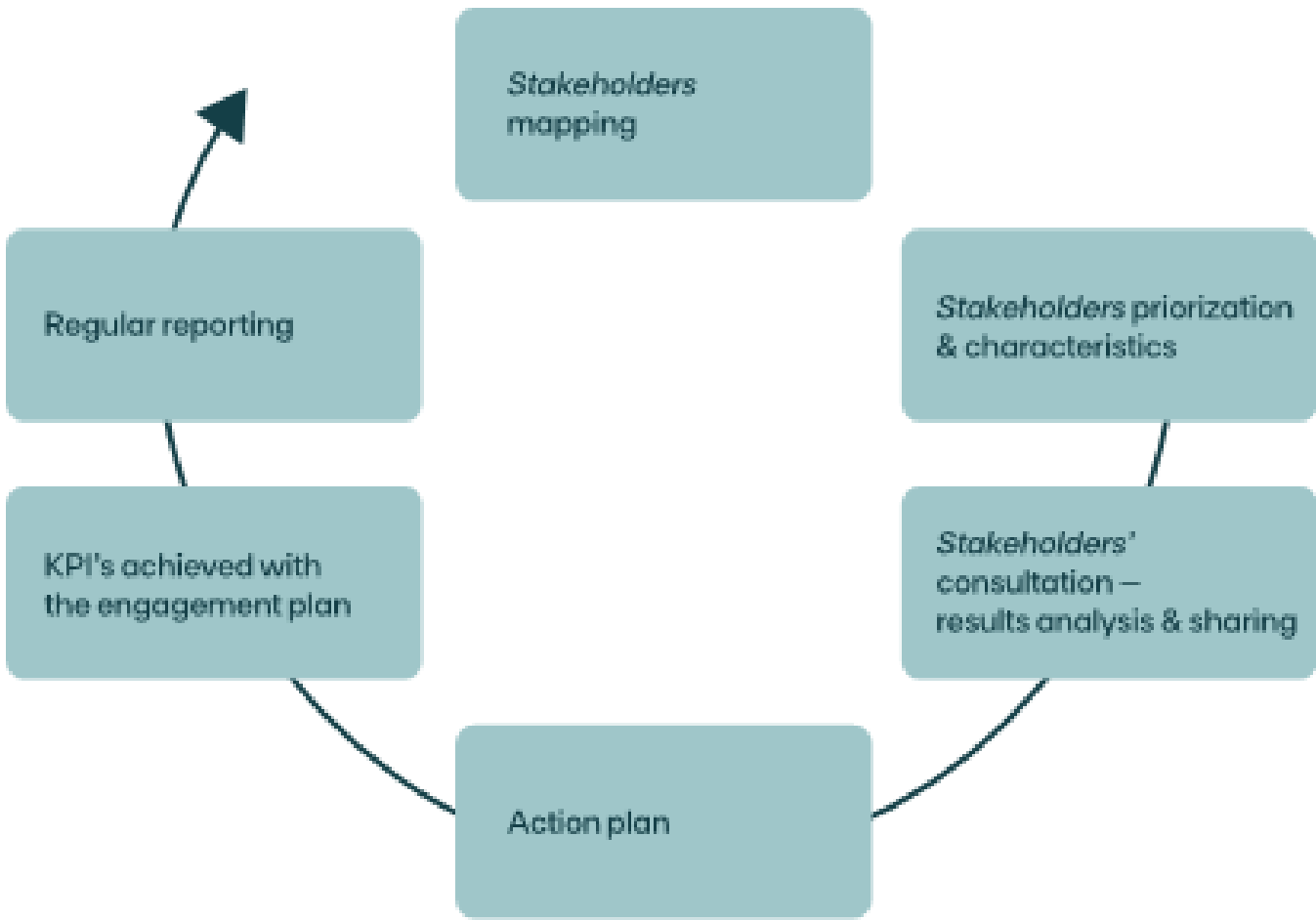
ANNEXES

All annexes are aligned with external and internal references. These tables are composed for the recording of local information at project scale, according with the methodology and references on the CSRD chapter 3.

Summary

Local Stakeholder Engagement Cycle	Annex I
Identification of Project Stakeholders	Annex II.1
Characterization of Project Stakeholders	Annex II.2
Stakeholder Hearings and Consultations	Annex II.3
Structuring the Local Stakeholder Engagement Plan	Annex II.4
Outcomes of the Local Stakeholder Engagement Plan	Annex II.5
Periodic Reporting	Annex II.6

ANNEX I – Local Stakeholder Engagement Cycle



ANNEX II.1 – Identification of Project Stakeholders

STAKEHOLDERS IDENTIFICATION MAP						
Stakeholder	Stakeholder segment	Internal impact	Proximity	External impact	Representativeness	Vulnerability

ANNEX II.2 - Characterization of project Stakeholders

STAKEHOLDERS CHARACTERIZATION MAP										
Stakeholder	Local / national / international	Stakeholder segment	Important themes	Internal or external themes	Position vis-à-vis the project	Impact on operations	Impact on other stakeholders	Visibility in the media and community	Impact of the project on stakeholder	Contacts

ANNEX II.3 – Project Stakeholder Hearings

HEARING RESULTS MAP – [HEARING DATE]							
Consulted stakeholder	Stakeholder segment	Stakeholder contact	Stakeholder priority topics	Importance of the topic to the stakeholder	Risk involved	Performance evaluation of EDPR by stakeholders	Next steps

ANNEX II.4 - Stakeholder Engagement Plan Structure

STAKEHOLDERS ENGAGEMENT PLAN							
Stakeholder	Stakeholder segment	Person in charge (contact)	Engagement objectives	In accordance with the definition of initiatives			
				Mandatory measures	Deadlines	Voluntary Measures	Deadlines

STAKEHOLDERS ENGAGEMENT PLAN (CONT.)						
Actions to be undertaken	Channels to be used and developed		Expected outcomes	KPIs	Actions to be undertaken Nature	Channels to be used and developed Action
Nature	Action		Deadlines			

ANNEX II.4. 1 - Region-Specific Engagement Plan Template

REGION REGULATORY REQUIREMENTS					
Region	Regulatory requirements	Key stakeholders	Engagement methods	Kpis	Deadlines

ANNEX II.5 -Results of the Stakeholders Engagement Plan

RESULTS OF THE STAKEHOLDERS ENGAGEMENT PLAN				
Stakeholder	Stakeholder segment	Person in charge (contact)	Objectives achieved	In accordance with the definition of initiatives

RESULTS OF THE STAKEHOLDERS ENGAGEMENT PLAN

	Mandatory Measures	Implementation Report	Voluntary Measures	Implementation Report
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RESULTS OF THE STAKEHOLDER ENGAGEMENT PLAN (CONT)

Actions undertaken			Channels used	Outcomes obtained	Kpis implementation
Nature	Action	Implementation report		Nature	

ANNEX II.6 – Scheduled Reports

REGULAR REPORTING

Stakeholder	Stakeholder segment	Contact	Priority themes	Difficulties	Planned answer	Actions already taken	EDPR time commitment planned or taken	EDPR expectations
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REGULAR REPORT (CONT.)

Project	Stakeholder manager	Development phase	One-year challenges	Assets	Necessary funds
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