



Environmental Policy

It sets out EDPR's commitments to protect the environment, reduce the impacts of its activities and manage operational risks, guiding continuous improvement across the value chain.

Disclosure: Public

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1. VERSION HISTORY

| Version | Date of Approval | Elaboration | Approval | Comment / Revoke |
|---------|---|-------------------------------------|--------------------------|---|
| 1 | 28/05/2018 | Corporate Sustainability Department | EDPR Executive Committee | Initial Issuance |
| 2 | 26/04/2021 | Corporate Sustainability Department | Board of Directors | Revision |
| 3 | 23/02/2026 | IR&ESG | Board of Directors | Revision – Revokes the version approved on 26/04/2021 |
| | <p>Main changes:</p> <ul style="list-style-type: none"> – Aligned the responsibilities to the new internal operating model; Included external context to support commitments; Reviewed semantic to better align with Corporate Sustainability Reporting Directive and Corporate Sustainability Due Diligence Directive. | | | |

2. OBJECTIVE

The EDP Renováveis Group (“EDPR”) conducts its upholding the highest ethical standards and promoting the principles of the UN Global Compact. Recognising the key role of the energy sector, EDPR has committed to contributing to nine Sustainable Development Goals (SDGs) with emphasis on those of greater environmental relevance: (i) 7 - Affordable and Clean Energy, (ii) 11 - Sustainable Cities and Communities, (iii) 12 – Responsible Consumption and Production, (iv) 13 - Climate Action, (v) 15 – Life on Land, and (vi) 17 - Partnerships for the Goals.

This Environmental Policy forms part of EDPR’s integrated sustainability management, establishing the framework for strategy and related action plans, which are monitored using internationally recognized methodologies to create value for stakeholders.

Therefore, this Policy sets out EDPR’s vision and commitments for managing nature-related issues, defines the guiding principles for the continuous improvement of nature protection performance in both the short and long term, and provides the basis for establishing objectives and targets that reflect stakeholder expectations.

3. SCOPE

This Policy applies to all companies and entities that are part of the EDP Renováveis (‘EDPR’) Group, and EDP Renováveis Group employees, always in strict compliance with the applicable legal framework

in the geographical areas where the Group operates and without prejudice to the necessary operational adaptations at local level.

The Environmental Policy also applies to entities that provide services at EDPR facilities and infrastructures, or that act on behalf of and represent the companies comprising the EDPR Group.

EDPR will further promote the adoption of the principles of this Policy among other participants in the value chain, including suppliers, joint ventures, customers, or other partners.

4. OBJECT

4.1 Commitments

4.1.1. Global Commitments

EDPR recognizes the fundamental right to a clean healthy and sustainable environment, considering Environment protection as a strategic management element, aimed at preventing air, water and soil pollution and reducing the impacts and dependencies of its activity on nature. To this end, the company undertakes the following set of commitments to guarantee the implementation and continual maintenance of robust and effective environmental management systems, establishing Sustainable Development as the overarching objective.

- Integrate environmental protection and the enhancement of natural capital into decision-making processes, at different stages of the asset life cycle activities, including planning, design, construction, operation, power reinforcement, and decommissioning.
- Identify, assess, and mitigate the environmental risks of its activities, seeking to maximise opportunities and extend this process to the supply chain, promoting the improvement of the environmental performance.
- Prevent pollution, particularly in response to emergencies in disaster and/or serious accidents situations, including those involving hazardous substances.
- Promote the continuous improvement of processes, practices, and environmental performance by setting goals and objectives to reduce environmental impacts and by encouraging research, development and innovation.
- Comply with applicable environmental legislation, as well as other voluntarily assumed obligations, anticipating the application of new legislation whenever possible.
- Consult key stakeholders, in particular affected communities and indigenous people, and consider their relevant expectations in the implementation of this policy and in decision-making processes.
- Communicate performance regularly and transparently, ensuring balance, understanding and accessibility by stakeholders, particularly local and affected communities.

- Provide training to employees on the company's environmental impacts, dependencies, risks and opportunities. Empower and raise awareness for the improvement of individual and collective environmental performance, contributing to public clarification.
- Foster the improvement of environmental performance of the customer, through the offer of products and services with a smaller environmental footprint.

EDPR integrates the commitments of this Policy into management decision-making and due diligence processes, including those related to mergers and acquisitions.

Based on the Group strategic priorities, EDPR also assumes a set of **specific commitments**.

4.1.2 Climate Change

EDPR commits to a decarbonization pathway aligned with the Paris Agreement and climate science reducing the impacts of climate change through:

Mitigation, by:

- Increasing its installed capacity and production from renewable energy sources;
- Reducing direct and indirect greenhouse gas emissions, in a decarbonization pathway aligned with recognized Net Zero power sector standards;
- Promoting the reduction of emission in the supply chain, ensuring alignment with the Group climate objectives;
- Providing low-carbon energy solutions, promoting the electrification of consumption;
- Improving energy efficiency in its own operations, enhancing the portfolio of energy-efficient products and services offered to customers, and enabling access to energy-efficiency solutions for vulnerable communities.

Adaptation, by:

- Assessing the level of exposure of its assets to physical climate risks, considering different time horizons and climate scenarios;
- Promoting the adaptation of its assets to climate change and increasing its resilience.

4.1.3. Circular Economy

For economic development decoupled from the intensive extraction of natural resources and promoting the regeneration of nature and its services, EDPR commits to promoting the efficient use of natural resources, from a life cycle analysis perspective, in particular by:

- Minimizing the use of natural resources;
- Optimizing and efficiently manage its assets;
- Maximizing the valorisation of waste and its reintroduction into the economy;
- Promoting circularity in the selection and use of equipment;
- Developing products and services that promote the circular economy;

- Promoting the sustainable management of water resources, minimizing its consumption, with special attention to areas of water stress.

4.1.4. Biodiversity

Framed by the Kunming-Montreal commitment to preserve and protect nature and its essential services and halt the loss of biodiversity by 2030, EDPR commits to contributes to:

- Reducing biodiversity loss, prioritizing the mitigation hierarchy, and seeking a positive balance in the long term;
- Deepening scientific knowledge, particularly through the establishment of partnerships.

4.2. Responsibilities

This Policy is integrated into the governance of the EDP Renováveis Group, and the responsibilities for defining, approving, implementing, and monitoring this policy are distributed according to the binding instructions of the EDP Renováveis Group, summarized in the table below:

| | |
|---|---|
| Board of Directors | The Board of Directors is responsible for approving the Environmental Policy. |
| Environmental, Social and Governance Committee | The ESG Committee is responsible for monitoring and advising the Board of Directors on the definition, implementation and oversight of the Environmental Policy, ensuring its compliance with the sustainability principles and corporate governance. |
| Management Team | Proposes the approval of ESG policies, including the Environmental Policy, as well as strategic goals and targets. |
| Investor Relations & ESG | Define and propose revisions to the Environmental Policy, the corporate guidelines in this area, and manage the corporate environmental management system. |
| Regions | Ensure the implementation of the Environmental Policy in business development, construction and operations. |

5. FINAL PROVISIONS

5.1. Objectives and targets

The commitments of this Policy are implemented through the definition of “SMART¹” goals and action plans promoting continuous improvement, implemented in short, medium and/or long-term.

5.2. Revision

This Policy will be reviewed every three years and in a shorter period whenever the external context or the strategic framework of the EDP Renováveis Group requires it.

5.3. Training

The Environmental Policy must be included in the curriculum contents of internal environmental training, throughout the EDP Renováveis Group and externally, with suppliers and service providers, especially those who act in the name and on behalf of any of the companies that make up the EDP Group, as well as partner entities, when applicable.

REFERENCES

Internal References

- Code of Ethics
- Human and Labour Rights Policy
- Stakeholder Relationship Policy

External References

- The Ten Principles of the UN Global Compact;
- 2030 Agenda for Sustainable Development, United Nations, 2015;
- Paris Agreement (2025)
- Kunming-Montreal Global Biodiversity Framework UN (2022);
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, 2023;
- Directive (EU) 2022/2464, on corporate sustainability reporting and its Delegated Regulation (EU) 2023/2772;
- Directive (EU) 2024/1760, on corporate sustainability due diligence;
- Delegated Regulation (UE) 2023/2772 of 31 July 2023;
- ISO 14001:2015;
- ISO 26000:2010;
- Regulation (EC) No 1221/2009, on the voluntary participation of organizations in a Community eco-management and audit scheme (EMAS).

¹ Specific, Measurable, Attainable, Realistic, Timely