



# CHANGING TOMORROW

**NOW** EDP REDES ESPAÑA  
GRI APPENDIX 2021





## GRI APPENDIX EDP REDES ESPAÑA 2021



### GOVERNANCE

102 GENERAL DISCLOSURES: ORGANIZATIONAL PROFILE		
102-1	Name of the organization	EDP Redes España, S.L.
102-2	Activities, brands, products, and services	The purpose of the company is the transformation, transport, distribution and supply of electricity (from hydraulic, thermal, nuclear, hydrocarbon sources of all kinds, solar or any other alternative source) as well as any other activity related to or derived from the above in the energy field.
102-3	Location of headquarters	Plaza de la Gesta 2 Oviedo (Asturias).
102-4	Location of operations	EDP Redes España's operations are carried out entirely in Spain.
102-5	Ownership and legal form	EDP Redes España is part of the EDP Group of which the parent company is EDP-Energías de Portugal S.A., with its registered office in Lisbon, which files its consolidated financial statements in the Lisbon registry.
102-6	Markets served	See EDP Redes España Sustainability Report chapter 1 section 1.4.1 "Where are we".
102-7	Scale of the organization	See EDP Redes España Sustainability Report chapter 1 section 1.3.2 "Key figures" and chapter 4 "Year-to-year data".
102-8	Information on employees and other workers	See EDP Redes España Sustainability Report chapter 1 section 1.3.2 "Key figures" and chapter 4 "Year-to-year data".
102-9	Supply chain	See EDP Redes España Sustainability Report chapter 3 section 3.3.3 "Sustainability in the value chain".
102-10	Significant changes to the organization and its supply chain	During 2021 there have been no significant changes in the organization and supply chain. In the year, the corporate movements of 2020 have been consolidated and the operation of EDP Redes España has started as a holding company that joins the Group's electricity distribution companies (Hidrocarbónico Distribución eléctrica, Viesgo Distribución eléctrica and Begasa).
102-11	Precautionary Principle or approach	<p>The precautionary principle is aimed at effectively controlling and managing the Company's risks with special emphasis on those that are most significant for the development of business activities:</p> <p>The different management systems (compliance, quality, environment, occupational health and safety..) perform the specific analysis of each of the risks and their conditioning factors taking into account their nature provenance possibility and probability of occurrence as well as the importance of their impact additionally contemplating the appropriate management measures.</p>

102-12	External initiatives	The EDP Redes España strategy is part of EDP Spain's strategy, which has published its commitment and aligned its strategy with the United Nations 2030 Agenda, with special emphasis on SDGs 5, 7, 8, 9, 11, 12, 13, 15 and 17. At the parent company level, it is a signatory of the Global Compact and EDP Spain is a member of the Spanish Global Compact Network. It is also part of the Global and European Dow Jones Sustainability Index CDP Business Ambition for 1.5°C SBTi and other benchmark ESG indexes (see <a href="https://www.edp.com/es/sostenibilidad/participaciones">https://www.edp.com/es/sostenibilidad/participaciones</a> ).
102-13	Membership of associations	At the national level, it is a member of Aelec, the Association of electric power companies, and is represented in other business associations for the defense of its interests and public participation.
102	GENERAL DISCLOSURES: STRATEGY	
102-14	Strategy: Statement from senior decision-maker	See Letter from the Chairman and Letter from the CEO in the EDP Redes España Sustainability Report, Section 1.1 "Letters".
102-15	Strategy: Key impacts, risks, and opportunities	See EDP Redes España Sustainability Report chapter 2.
102	GENERAL DISCLOSURES: ETHICS AND INTEGRITY	
102-16	Values, principles, standards, and norms of behavior	See EDP Redes España Sustainability Report chapter 3 section .3.4.1 "Ethics". More information on all aspects of the values, principles, standards and rules of conduct of the organization are described in the Ethics section of the corporate website: <a href="https://www.edp.com/es/edp/etica-en-edp">https://www.edp.com/es/edp/etica-en-edp</a> .
102-17	Mechanisms for advice and concerns about ethics	See EDP Redes España Sustainability Report chapter 3 section 3.4.1 "Ethics". More information: <a href="https://www.edp.com/es/edp/etica-en-edp">https://www.edp.com/es/edp/etica-en-edp</a>
102	GENERAL DISCLOSURES: GOVERNANCE	
102-18	Governance structure	Due to EDP Redes España belongs to the EDP Group, the Corporate Governance aspects coincide with those of EDP. See the EDP Group's annual report "Relatorio e Contas" on the corporate website: <a href="https://www.edp.com/es/sostenibilidad/transparencia-e-informes#informes">https://www.edp.com/es/sostenibilidad/transparencia-e-informes#informes</a>
102-20	Executive-level responsibility for economic, environmental, and social topics	See EDP Redes España Sustainability Report chapter 1 section 1.4.2 "Sustainability organization".
102-21	Consulting stakeholders on economic, environmental, and social topics	See EDP Redes España Sustainability Report chapter 1 section 1.4.4 "Management of Stakeholders" and chapter 2 section 2.3.2 "Materiality".
102	GENERAL DISCLOSURES: STEAKHOLDER ENGAGEMENT	
102-40	List of stakeholder groups	See EDP Redes España Sustainability Report chapter 1 section 1.4.4 "Management of Stakeholders".

102-41	Collective bargaining agreements	Resolution of February 26, 2019, of the Directorate General of Labor, by which the Collective Bargaining Agreement of the EDP España Group is registered and published: <a href="https://www.boe.es/diario_boe/txt.php?id=BOE-A-2019-3373">https://www.boe.es/diario_boe/txt.php?id=BOE-A-2019-3373</a> .  Resolution of October 19, 2021 of the Directorate General of Labor, by which the IV Framework Collective Bargaining Agreement of the Viesgo España Group is registered and published: <a href="https://www.boe.es/diario_boe/txt.php?id=BOE-A-2021-18607">https://www.boe.es/diario_boe/txt.php?id=BOE-A-2021-18607</a> .
102-42	Identifying and selecting stakeholders	See EDP Redes España Sustainability Report chapter 1 section 1.4.4 "Management of Stakeholders" and chapter 2 section 2.3.2 "Materiality".
102-43	Approach to stakeholder engagement	See EDP Redes España Sustainability Report chapter 1 section 1.4.4 "Management of Stakeholders" and chapter 2 section 2.3.2 "Materiality".
102-44	Key topics and concerns raised	See EDP Redes España Sustainability Report chapter 1 section 1.4.4 "Management of Stakeholders" and chapter 2 section 2.3.2 "Materiality".
<b>102 GENERAL DISCLOSURES: REPORTING PRACTICE</b>		
102-45	Entities included in the consolidated financial statements	Hidrocantábrico Distribución Eléctrica S.A. Viesgo Distribución Eléctrica S.L. Barras Eléctrica Galaico Asturianas S.A.
102-46	Defining report content and topic Boundaries	See EDP Redes España Sustainability Report chapter 2 section 2.3.2 "Materiality".
102-47	List of material topics	See EDP Redes España Sustainability Report chapter 2 section 2.3.2 "Materiality".
102-48	Restatements of information	Not applicable.
102-49	Changes in reporting	In 2021.
102-50	Reporting period	In 2021.
102-51	Date of most recent report	The last Sustainability Report for the 2020 financial year was published in April 2021.
102-52	Reporting cycle	Annual.
102-53	Contact point for questions regarding the report	Environment, Sustainability, Innovation and Climate Change Department of EDP España. sostenibilidad@edp.com
102-54	Claims of reporting in accordance with the GRI Standards	This Report has been prepared in accordance with the "Essential" option in accordance with the guidelines established in the G4 Guidelines of the Global Reporting Initiative.
102-55	GRI content index	In 2021, the GRI Index is prepared as an independent and complementary document to the EDP Spain Sustainability Report for the year 2021.

102-56	External assurance	<p>This Report has not been verified by an independent third party. The EDP Group annual report "Relatorio e Contas" which consolidates all EDP Redes España data has been verified by PwC in accordance with the ISAE 3000 Standard, therefore the data reported from this group to EDP has been verified externally.</p> <p>For more information see EDP Group annual report: <a href="https://www.edp.com/es/node/1351#reports-and-accounts">https://www.edp.com/es/node/1351#reports-and-accounts</a> See also EDP Group Sustainability Report: <a href="https://www.edp.com/sites/default/files/2022-05/EDP_Sustainability_Report_2021.pdf">https://www.edp.com/sites/default/files/2022-05/EDP_Sustainability_Report_2021.pdf</a></p> <p>Other relevant ESG publications can be found at: <a href="https://www.edp.com/en/sustainability/transparency-and-reporting#reports">https://www.edp.com/en/sustainability/transparency-and-reporting#reports</a></p> <p>Other non-financial information specific to EDP Redes España is independently verified in accordance with applicable legislation. Non-Financial Information Statements are made for the Group companies with more than 250 employees: EDP España, Hidrocantábrico Distribución Eléctrica and Viesgo Distribución."</p>
103	MANAGEMENT APPROACH	
103-1	Explanation of the material topic and its Boundary	<p>EDP Redes España's sustainability strategy includes the annual materiality study as a study to identify the most relevant aspects for all stakeholders, including both positive and negative aspects, both current and in the medium and long term.</p> <p>This direct or indirect participation of stakeholders through the study and listening to their needs and expectations not only demonstrates transparency in management, but also makes it possible to identify and prioritize which aspects to base management on, both in terms of risk management under the precautionary principle and the identification of challenges and opportunities.</p> <p>See EDP Redes España Sustainability Report, chapter 2, section 2.3.2 "Materiality".</p>
103-2	The management approach and its components	See EDP Redes España Sustainability Report chapter 2, section 2.3 "Strategy, goals and targets".
103-3	Evaluation of the management approach	See EDP Redes España Sustainability Report chapter 2, section 2.3 "Strategy, goals and targets".
201	ECONOMIC PERFORMANCE	
201-1	Direct economic value generated and distributed	See EDP Redes España Sustainability Report chapter 1 section 1.3.2 "Key figures" and chapter 4 "Year-to-year data".
201-2	Financial implications and other risks and opportunities due to climate change	See EDP Redes España Sustainability Report chapter 2, section 2.2.4 "Climate Risk Strategy and Management".
201-3	Defined benefit plan obligations and other retirement plans	See EDP Redes España Sustainability Report chapter 4 "Year-to-year data".
201-4	Financial assistance received from government	This information is reported in the "Audit Reports Annual Accounts and Management Report as of December 31, 2021 for Hidrocantábrico Distribución Eléctrica S.A." and "Audit Reports Annual Accounts and Management Report as of December 31, 2021 for Viesgo Distribución Eléctrica S.L."

201 ECONOMIC PERFORMANCE		
201-1	Direct economic value generated and distributed	See EDP Redes España Sustainability Report chapter 1 section 1.3.2 "Key figures" and chapter 4 "Year-to-year data".
201-2	Financial implications and other risks and opportunities due to climate change	See EDP Redes España Sustainability Report chapter 2, section 2.2.4 "Climate Risk Strategy and Management".
201-3	Defined benefit plan obligations and other retirement plans	See EDP Redes España Sustainability Report chapter 4 "Year-to-year data".
201-4	Financial assistance received from government	This information is reported in the "Audit Reports Annual Accounts and Management Report as of December 31, 2021 for Hidrocantábrico Distribución Eléctrica S.A." and "Audit Reports Annual Accounts and Management Report as of December 31, 2021 for Viesgo Distribución Eléctrica S.L.".
202 MARKET PRESENCE		
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	The base salary table is established in the III Collective Bargaining Agreement of the EDP España Group and IV Collective Bargaining Agreement of the Viesgo Group.  Minimum interprofessional wage: €965/month.  Royal Decree 817/2021 of September 28, which sets the minimum interprofessional wage for 2021.  <a href="https://www.boe.es/buscar/doc.php?id=BOE-A-2021-15770">https://www.boe.es/buscar/doc.php?id=BOE-A-2021-15770</a>
202-2	Proportion of senior management hired from the local community	The term "local" is understood to mean the entire national territory.
203 INDIRECT ECONOMIC IMPACTS		
203-1	Infrastructure investments and services supported	See EDP Redes España Sustainability Report chapter 3.1 "Leading the energy transition" section 3.1.1 "Smart grids for the energy transition".
203-2	Significant indirect economic impacts	"See EDP Redes España Sustainability Report, chapter 1, section 1.4.4 "Stakeholder management", chapter 2, section 2.3.4 "Commitment to excellence", section 3.1.1 "Smart grids for the energy transition" and sections 3.3.3 "Sustainability in the value chain" and 3.3.4 "Projects and actions with stakeholders".
204 PROCUREMENT PRACTICES		
204-1	Proportion of spending on local suppliers	EDP Redes España understands as "local" the entire national territory.

205 ANTI-CORRUPTION		
205-1	Operations assessed for risks related to corruption	See EDP Redes España Sustainability Report chapter 3 section 3.4.3 "Compliance".
205-2	Communication and training about anti-corruption policies and procedures	See EDP Redes España Sustainability Report chapter 3 section 3.4.3 "Compliance".
205-3	Confirmed incidents of corruption and actions taken	0 Cases.
206 ANTI-COMPETITIVE BEHAVIOR		
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	There are no cases related to unfair competition and violations of applicable laws.



301 MATERIALS		
301-1	Materials used by weight or volume	See EDP Redes España Sustainability Report chapter 4 section 4.1.1 "Financial Indicators".
301-2	Recycled input materials used	See EDP Redes España Sustainability Report chapter 4 section 4.1.2 "Environmental Indicators".
302 ENERGY		
302-1	Energy consumption within the organization	See EDP Redes España Sustainability Report chapter 4 section 4.1.1 "Financial Indicators".
302-2	Energy consumption outside of the organization	See EDP Redes España Sustainability Report, chapter 1, section 1.3.2 "Key figures".
302-3	Energy intensity	See EDP Redes España Sustainability Report chapter 4 section 4.1.2 "Environmental Indicators".
302-4	Reduction of energy consumption	A large number of LEAN improvement program initiatives are operational efficiency initiatives which directly or indirectly involve aspects of consumption reduction. See EDP Redes España Sustainability Report chapter 2 section 2.3.5 "Continuous improvement".
302-5	Reductions in energy requirements of products and services	See EDP Redes España Sustainability Report, chapter 3, section 3.2.3 "Climate action"
303 WATER AND EFFLUENTS		
303-1	Interactions with water as a shared resource	The use of water in EDP Redes España for the electricity distribution business is not considered material.
304 BIODIVERSITY		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	EDP Redes España has distribution facilities in protected areas, and there are specific monitoring plans. See EDP Redes España Sustainability Report, chapter 3, section 3.2.2 "Natural Capital and Biodiversity Protection". Additional information on the corporate website: <a href="https://espana.edp.com/es/sostenibilidad/compromiso-ambiental/biodiversidad#gestion-edp-espana">https://espana.edp.com/es/sostenibilidad/compromiso-ambiental/biodiversidad#gestion-edp-espana</a>
304-2	Significant impacts of activities, products, and services on biodiversity	See EDP Redes España Sustainability Report chapter 3 section 3.2.2 "Natural Capital and Biodiversity Protection".



305	EMISSIONS	
305-1	Direct (Scope 1) GHG emissions	See EDP Redes España Sustainability Report, chapter 3, section 3.2.3 "Climate action"
305-2	Energy indirect (Scope 2) GHG emissions	See EDP Redes España Sustainability Report, chapter 3, section 3.2.3 "Climate action"
305-3	Other indirect (Scope 3) GHG emissions	See EDP Redes España Sustainability Report, chapter 3, section 3.2.3 "Climate action"
305-4	GHG emissions intensity	See EDP Redes España Sustainability Report, chapter 3, section 3.2.3 "Climate action"
305-5	Reduction of GHG emissions	See EDP Redes España Sustainability Report, chapter 3, section 3.2.3 "Climate action"
306	WASTE	
306-1	Waste generation and significant waste-related impacts	See EDP Redes España Sustainability Report chapter 3 section 3.2.1 "Circular Economy Promotion" and chapter 4 "Year-to-year data".
306-2	Management of significant waste-related impacts	See EDP Redes España Sustainability Report chapter 3 section 3.2.1 "Circular Economy Promotion" and chapter 4 "Year-to-year data".
306-3	Waste generated	See EDP Redes España Sustainability Report chapter 3 section 3.2.1 "Circular Economy Promotion" and chapter 4 "Year-to-year data".
306-4	Waste diverted from disposal	See EDP Redes España Sustainability Report chapter 3 section 3.2.1 "Circular Economy Promotion" and chapter 4 "Year-to-year data".
307	ENVIROMENTAL COMPLIANCE	
307-1	Non-compliance with environmental laws and regulations	No material environmental files have been registered in 2021.
308	SUPPLIER ENVIROMENTAL ASSESSMENT	
308-1	New suppliers that were screened using environmental criteria	100% of critical suppliers have been evaluated according to environmental criteria. See EDP Spain Sustainability Report chapter 3 section 3.3.3 "Sustainability in the value chain".



SOCIAL

401 EMPLOYMENT		
401-1	New employee hires and employee turnover	Average age of workers: 49 years old.
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Part-time or temporary employees are entitled to the usual benefits of full-time employees except for the Pension Plan which is only activated after 6 months from the date of hiring and temporary employees who would not be entitled to it due to the nature of the plan.
401-3	Parental leave	100% all employees are entitled to parental leave.
402 LABOR/MANAGEMENT RELATIONS		
402-1	Minimum notice periods regarding operational changes	Period of 15 days (2 weeks). See article 65 "Substantial modifications to working conditions" of the III Collective Bargaining Agreement of EDP España Group 2018-2025 and of the IV Collective Bargaining Agreement of Viesgo Group"
403 OCCUPATIONAL HEALTH AND SAFETY		
403-1	Occupational health and safety management system	EDP Redes España has an Occupational Risk Prevention Management System in accordance with ISO 45001 - "Occupational Health and Safety Management Systems" which is certified by an accredited external entity. See EDP Redes España Sustainability Report Chapter 3 section 3.3.1 "Health and Safety". Policy: <a href="https://www.edp.com/es/politica-de-seguridad-y-salud-en-el-trabajo">https://www.edp.com/es/politica-de-seguridad-y-salud-en-el-trabajo</a>
403-2	Hazard identification, risk assessment, and incident investigation	EDP Redes España has a Prevention Policy and an Integrated Occupational Risk Prevention Management System whose goal is zero accidents. In order to achieve this objective and involve the entire workforce in its attainment, the Occupational Risk Prevention Manual has been published, a document which defines and develops the set of rules and procedures that apply both to the company's own personnel and those of collaborating companies and which facilitate the practical application of the group's Occupational Risk Prevention principles. In addition, the company's commitments in this area are included in Chapter VI of the 3rd Collective Bargaining Agreement. Likewise, within the SGPRL there are Risk Guides; Procedures, instructions and specifications; Emergency and self-protection plans; etc. See EDP Redes España Sustainability Report Chapter 3, section 3.3.1 "Health and Safety".
403-3	Occupational health services	EDP Redes España has its own joint Prevention Service, adapted to the needs of all the companies of the Group, through which health surveillance services are available depending on the risks inherent to the work carried out, facilitating medical check-ups and informing and raising the awareness of all employees on occupational health matters. See EDP Redes España Sustainability Report Chapter 3, section 3.3.1 "Health and Safety".

403-4	Worker participation, consultation, and communication on occupational health and safety	Chapter VI of the III Collective Bargaining Agreement establishes in Section 2 "Prevention Bodies" the organization of the prevention service, the right of consultation of the workers' legal representatives and the rights of participation and representation of the workers through the Prevention Delegates, the Central Committee and the Health and Safety Subcommittees.
403-5	Worker training on occupational health and safety	See EDP Redes España Sustainability Report, chapter 3, section 3.3.1 "Health and Safety".
403-6	Promotion of worker health	Within the Flexible Compensation Plan offered to EDP Redes España employees, there is a Medical Insurance which allows access to a private health service through which it is possible to have access to professionals and medical centers of reference.
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	See EDP Redes España Sustainability Report, chapter 3, section 3.3.1 "Health and Safety".
403-8	Workers covered by an occupational health and safety management system	100% of employees
403-9	Work-related injuries	See EDP España Sustainability Report chapter 4 "Year-to-year data".
403-10	Work-related ill health	See EDP Redes España Sustainability Report, chapter 3, section 3.3.1 "Health and Safety" and chapter 4 "Year-to-year data".
404	TRAINING AND EDUCATION	
404-1	Average hours of training per year per employee	28 hours For more information on training, see the EDP Redes España sustainability report, chapter 1, section 1.3.2 "Key figures".
404-2	Programs for upgrading employee skills and transition assistance programs	See EDP Redes España Sustainability Report, chapter 3, section 3.3.2 "Organization ready for the future" and chapter 4 "Year-to-year data".
404-3	Percentage of employees receiving regular performance and career development reviews	100% of EDP Redes España's employees receive a periodic performance evaluation. Workers who join the workforce after August 1 of the current year do not receive their performance evaluation until the following year.
405	DIVERSITY AND EQUAL OPPORTUNITY	
405-1	Diversity of governance bodies and employees	See EDP Redes España Sustainability Report, chapter 3, section 3.3.2 "Organization ready for the future".
405-2	Ratio of basic salary and remuneration of women to men	See salary table in III Collective Agreement of EDP España Group and IV Collective Agreement of Viesgo Group. EDP España is complying with the obligation foreseen in the non-financial report during the first quarter of 2021 and monitors according to the same criteria all the companies of the EDP España Group.

406 NON-DISCRIMINATION		
406-1	Incidents of discrimination and corrective actions taken	<p>There have been no cases of discrimination during the reporting period.</p> <p>Additional information: "Supplier Ethics Report" and "Human and Labor Rights Report" are published annually and can be consulted in the "Transparency and Reports" section of the corporate website <a href="https://www.edp.com/es/sostenibilidad/transparencia-e-informes#informes">https://www.edp.com/es/sostenibilidad/transparencia-e-informes#informes</a></p>
407 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING		
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	<p>The Third Collective Bargaining Agreement of the EDP España Group and the Fourth Collective Bargaining Agreement of the Viesgo Group currently in force include the rights to freedom of association and collective bargaining, free representation, participation and union action, as well as the creation of union sections empowered to negotiate could be at collective risk.</p> <p>Both agreements are the main management tool for employee participation in the operations of the organizations. This participation is guaranteed through the Joint Committees created for this purpose, the most important of which is the Joint Labor Affairs Committee, which is formed to inform and consult with employees on all aspects of the Agreement, including those related to the reorganization of the company.</p> <p>Other Joint Committees deal with different specific matters such as Professional Classification, Social Action, Interpretation, Application and development of regulations, Labor Affairs, Training and Equality.</p> <p>Likewise, the EDP Group's Code of Ethics specifically establishes that it is guaranteed to "respect the freedom of union association and recognize the right to collective bargaining", aspects that extend to the entire value chain.</p> <p>In the 2021 fiscal year, all critical suppliers have been evaluated under ESG criteria and no non-compliance in this area has been identified. See EDP Redes España Sustainability Report, chapter 3, section 3.3.3 "Sustainability of the value chain".</p> <p>In the section of "Transparency and Reports" of the corporate website you can also consult the "Ethics Supplier Reports" and "Human and Labor Rights Report" both elaborated and published annually.</p> <p><a href="https://www.edp.com/es/sostenibilidad/transparencia-e-informes#informes">https://www.edp.com/es/sostenibilidad/transparencia-e-informes#informes</a></p>
408 CHILD LABOR		
408-1	Operations and suppliers at significant risk for incidents of child labor	<p>Child labor is not a risk factor for EDP Redes España and there is a clear commitment to fight against this aspect as reflected in the Code of Ethics where EDP expressly undertakes "not to employ child or forced labor or accept such practices by third parties that supply products or provide services".</p> <p>Likewise, it is established that EDP's suppliers "are expressly required to respect or accept the principles set forth in this Code in accordance with the obligations deriving from the qualification procedures or established contracts".</p> <p>In the supply chain, all critical suppliers are evaluated in terms of ESG, with no aspects related to the use of child labor being identified in the 2021 fiscal year.</p> <p>See EDP Redes España Sustainability Report chapter 3 section 3.3.3 "Sustainability of the value chain".</p> <p>Additional information: "Supplier Ethics Report" and "Human and Labor Rights Report" are published annually and can be consulted in the "Transparency and Reports" section of the corporate website.</p> <p><a href="https://www.edp.com/es/sostenibilidad/transparencia-e-informes#informes">https://www.edp.com/es/sostenibilidad/transparencia-e-informes#informes</a></p>



409 FORCED OR COMPULSORY LABOR		
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	<p>Forced labor is not a risk factor in EDP Redes España. Community and national regulations, the Collective Bargaining Agreement in force and the Code of Ethics guarantee, among others, the labor rights and social benefits of the Group's Employees.</p> <p>In the Code of Ethics EDP expressly undertakes to:</p> <p>Respect the Universal Declaration of Human Rights and international conventions, treaties or initiatives such as the Conventions of the International Labor Organization, the United Nations Global Compact and the Guiding Principles for Business of the Human Rights Council. In particular, EDP is against arbitrary detention, torture or execution and in favor of freedom of conscience and religious freedom of organization, freedom of association, freedom of opinion and expression; [...] "Respect and promote respect for human rights and fundamental freedoms.</p> <p>Respect and promote respect for employees by ensuring their right to decent working conditions. In particular, EDP seeks to protect its employees and does not tolerate acts of psychological violence and moral coercion - such as insults, threats, isolation, invasion of privacy or professional limitation - that have the purpose or consequence of inhibiting, undermining dignity or creating an intimidating, hostile, degrading, humiliating or destabilizing environment;</p> <p>Similarly, it is established that EDP suppliers "are expressly required to respect or accept the principles set forth in this Code in accordance with the obligations deriving from the qualification procedures or established contracts".</p> <p>In the supply chain, all critical suppliers are evaluated in terms of ESG, with no aspects related to forced or compulsory labor being identified in the 2021 fiscal year.</p> <p>See EDP Redes España Sustainability Report chapter 3 section 3.3.3 "Sustainability of the value chain".</p> <p>Additional information: "Supplier Ethics Report" and "Human and Labor Rights Report" are prepared and published annually and can be consulted in the "Transparency and Reports" section of the corporate website.</p> <p><a href="https://www.edp.com/es/sostenibilidad/transparencia-e-informes#informes">https://www.edp.com/es/sostenibilidad/transparencia-e-informes#informes</a></p>
412 HUMAN RIGHTS ASSESSMENT		
412-1	Operations that have been subject to human rights reviews or impact assessments	<p>In July 2021, a new Human and Labor Rights policy is approved and EDP group-wide report is published:</p> <p>Policy: <a href="https://www.edp.com/es/derechos-humanos">https://www.edp.com/es/derechos-humanos</a></p> <p>Report: <a href="https://www.edp.com/sites/default/files/2021-09/DHL_report2020_site.pdf">https://www.edp.com/sites/default/files/2021-09/DHL_report2020_site.pdf</a></p>
412-2	Employee training on human rights policies or procedures	See EDP Redes España Sustainability Report chapter 3 section 3.4.2 "Human and Labor Rights".

413 LOCAL COMMUNITIES		
413-2	Operations with local community engagement, impact assessments, and development programs	<p>To develop its business activities and at the same time meet the needs of the communities where it operates, the EDP Group promotes engagement with local communities and society from a perspective of creating shared value by leveraging its brand and employee strengths to maximize its impact on society.</p> <p>The company promotes an active and transparent engagement with local stakeholders in order to manage its impacts and reinforce the positive effects of its activity by building lasting relationships. Through this management, the aim is to create value for all stakeholders by defining four main axes: Understanding, Communicating, Trusting and Collaborating.</p> <p>On the other hand, the EDP Group helps local communities and the societies in which it is present to address their development priorities through financial and non-financial contributions. EDP's Social Investment is based on its Social Investment Policy which applies the principles and methodologies referred to in the ISO 26000 Corporate Social Responsibility Standard, the United Nations Social Investment Principles, the Sustainable Development Goals (SDGs) and the LBG social impact measurement methodology.</p> <p>See EDP Redes España Sustainability Report chapter 1 section 1.4.4 "Stakeholder management" chapter 2 section 2.3.1 "EDP Ambition 2030" and chapter 3 section 3.3.4 "Projects and actions with stakeholders".</p> <p>Additional information: See EDP Foundation activity and annual report.</p> <p><a href="https://www.fundacionedp.es/es/institucional/publicaciones/">https://www.fundacionedp.es/es/institucional/publicaciones/</a></p>
414 SUPPLIER SOCIAL ASSESSMENT		
414-1	New suppliers that were screened using social criteria	<p>100%</p> <p>See EDP Redes España Sustainability Report chapter 3 section 3.3.3 "Sustainability in the value chain".</p>
414-2	Negative social impacts in the supply chain and actions taken	<p>100% of critical suppliers have been assessed in relation to social impacts.</p> <p>See EDP Redes España Sustainability Report chapter 3 section 3.3.3 "Sustainability of the Value Chain".</p>
415 PUBLIC POLICY		
415-1	Political contributions	No contributions to political parties.
416 CUSTOMER HEALTH AND SAFETY		
416-1	Assessment of the health and safety impacts of product and service categories	<p>All distributed energy is analyzed to assess and prevent impacts on customer safety.</p> <p>This aspect is included within the scope of the ISO9001 certified Quality Management System in the Distribution activities.</p>
417 MARKETING AND LABELING		
417-2	Incidents of non-compliance concerning product and service information and labeling	It is not considered a material aspect.

417-3	Incidents of non-compliance concerning marketing communications	No non-compliance files relating to marketing communications have been identified. However it is not considered a material aspect.
418	CUSTOMER PRIVACY	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	EDP's data protection commitment is organized through the "governance model" in which specific resources are defined to guarantee the privacy of personal data and the attributions assigned to all collaborators in this area are established EDP makes specific communication channels available to the data subject to deal with requests related to the processing of their personal data.
419	SOCIOECONOMIC COMPLIANCE	
419-1	Non-compliance with laws and regulations in the social and economic area	No non-compliance with laws or regulations has been identified. Additional information: See "Annual Internal Audit and Compliance Report" on the corporate website under the "Transparency and Reports" section. <a href="https://www.edp.com/es/sostenibilidad/transparencia-e-informes#informes">https://www.edp.com/es/sostenibilidad/transparencia-e-informes#informes</a>

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