

**INDEPENDENT VERIFICATION REPORT ON THE PARTIAL NON-FINANCIAL INFORMATION  
STATEMENT OF HIDROCANTÁBRICO DISTRIBUCIÓN ELÉCTRICA, S.A.U. FOR THE  
FINANCIAL YEAR ENDED ON 31 DECEMBER 2023**

To the Sole Shareholder of HIDROCANTÁBRICO DISTRIBUCIÓN ELÉCTRICA, S.A.U.:

In accordance with article 49 of the Spanish Commercial Code, we have verified, within a limited assurance scope, the attached Partial Non-Financial Information Statement (hereinafter, partial NFIS) of HIDROCANTÁBRICO DISTRIBUCIÓN ELÉCTRICA, S.A.U. (hereinafter, the Company) corresponding to the financial year ended on 31 December 2023, the information of which is included in a separate report from the consolidated management report of the EDP GROUP, the parent company of which is EDP ENERGÍAS DE PORTUGAL, S.A.

As stated in its management report, the Company has invoked the exemption provided by article 49.6 of the Spanish Commercial Code on the grounds that part of its non-financial information is included in the Annual Report of the EDP GROUP, based in Portugal, the parent company of which is EDP ENERGÍAS DE PORTUGAL, S.A., and to which it belongs. In order to meet the current commercial obligations regarding non-financial information reporting, the Company has prepared the NFIS containing partial information, which is recorded as an appendix titled '2023 Partial Non-Financial Information' to its management report, and which includes, according to the analysis conducted by the Company, the supplementary information required by article 49.6 of the Spanish Commercial Code compared to the information required by articles 19. Bis 1 and 29. Bis 1 of Directive 2014/95/EU. Our work has been exclusively limited to the verification, based on the mentioned analysis of contents, of the information identified in the 'GRI Chart' included in the attached NFIS; we have not conducted any verification procedure whatsoever on the information included in the Annual Report of the EDP Group.

**Responsibility of the Board of Directors**

The Board of Directors of the Company is responsible for the preparation of the partial NFIS included as an appendix titled '2023 Partial Non-Financial Information' to its management report, as well as the content thereof. The partial NFIS has been prepared pursuant to the provisions contained in the current commercial regulation and in accordance with the criteria of the selected Global Reporting Initiative Standards (GRI Standards) for Sustainability Reporting, and according to what is mentioned for each matter in the 'GRI Chart' included therein.

This responsibility also includes designing, implementing and maintaining the internal control deemed necessary to make sure that the partial NFIS is free from any material misstatement, due to fraud or error.

The Board of Directors of the Company is also responsible for defining, implementing, adjusting and maintaining the management systems from which the information required for the preparation of the partial NFIS is obtained.

### **Our independence and quality control**

We have met the independence requirements and other ethical requirements contained in the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA), which is based on the fundamental principles of integrity, objectivity, professional competence, diligence, confidentiality and professionalism.

Our firm applies the International Standard on Quality Control 1 (ISQC 1) and consequently maintains a global quality control system that includes policies and documented procedures related to the compliance with ethical requirements, professional standards and legal and regulatory provisions that may apply.

The team has been made up of professionals specialised in non-financial information reviews and, specifically, in economic and social performance information.

### **Our responsibility**

Our responsibility consists in expressing our conclusions in an independent limited assurance verification report based on the work performed.

We have carried out our reviewing work in accordance with the requirements set out in the current International Standard on Assurance Engagements 3000, 'Assurance Engagements Other than Audits or Reviews of Historical Financial Information' (ISAE 3000 Revised), issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC), and with the Guidelines for non-financial information statement verification engagements issued by the Spanish Institute of Chartered Accountants.

In a limited assurance engagement, the procedures that are carried out vary in nature and timing, and they have a shorter length than those conducted in a reasonable assurance engagement; thus, the assurance provided is also lower.

Our work has consisted in interviewing the Management and the various responsible units and areas of the Company that have participated in the preparation of the partial NFIS, reviewing the processes to gather and validate the information presented in the partial NFIS, and implementing certain analytical procedures and sampling tests that are described below:

- Meetings with the staff of the Company to learn about the business model, the policies and the management approaches applied, and the main risks related to those matters, and to obtain the necessary information for the external review.
- Analysis of the scope, relevance and integrity of the contents included in the partial NFIS for financial year 2023 according to the materiality analysis conducted by the Company and considering the contents required by the current commercial regulations.
- Analysis of the processes to gather and validate the data presented in the partial NFIS for financial year 2023.

- Review of the information relating risks, policies and management approaches applied with regard to the material aspects presented in the partial NFIS for financial year 2023.
- Verification, by means of tests, based on the selection of samples, of the information related to the contents included in the partial NFIS for financial year 2023 and its appropriate compilation from the data supplied by the information sources.
- Obtaining of a representation letter from the Directors and the Management of the Company.


### Conclusion

Based on the procedures carried out in our verification and on the evidence we have obtained, no aspect whatsoever has been revealed that leads us to believe that the contents of the partial information NFIS of HIDROCANTÁBRICO DISTRIBUCIÓN ELÉCTRICA, S.A.U. corresponding to the financial year ended on 31 December 2023 have not been prepared, in all material aspects, in accordance with the selected criteria of the GRI standards, as well as with the other criteria described pursuant to what is mentioned for each matter in the GRI Chart of the mentioned Statement. The contents of the mentioned partial information Statement have been established by HIDROCANTÁBRICO DISTRIBUCIÓN ELÉCTRICA, S.A.U. in accordance with the analysis conducted by comparing the non-financial information required by article 49.6 of the Spanish Commercial Code and the information provided in articles 19. Bis 1 and 29 Bis 1 of Directive 2014/95/EU. HIDROCANTÁBRICO DISTRIBUCIÓN ELÉCTRICA, S.A.U. has decided that the latter information will be included in the Annual Report of the EDP Group to which it belongs, and, consequently, the attached partial information NFIS does not include the total contents set out by the current commercial regulations.

### Purpose of our report

This report has been prepared to meet the requirement established by the commercial regulations in force in Spain; hence, it may not be appropriate for other purposes and jurisdictions.

Eudita SUMA Auditores, S.L.P.



Pablo Rodríguez Otero

Oviedo, 22 March 2024

INSTITUTO DE CENSORES  
JURADOS DE CUENTAS  
DE ESPAÑA

EUDITA SUMA AUDITORES,  
S.L.P.

2024 Núm.09/24/00478

Sello distintivo de otras actuaciones

**Hidrocantábrico Distribución Eléctrica, S.A.**

**Hidrocantábrico Distribución Eléctrica, S.A**

Management Report

Appendix- 2023 Partial Non-Financial Information

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## **1. Introduction**

Hidrocantábrico Distribución Eléctrica, S.A. has invoked the exemption contained in article 49.6 of the Commercial Code on the grounds of including part of its non-financial information in the Annual Report of the EDP GROUP, based in Portugal, the controlling company of which is EDP ENERGIAS DE PORTUGAL, S.A., and to which it belongs.

In order to meet the current commercial obligations on non-financial reporting matters, the Company has prepared this Non-Financial Information Statement (NFIS) containing partial information that includes, according to the analysis conducted by the Company, the additional information required by article 49.6 of the Commercial Code compared to the information required by articles 19. Bis 1 and 29. Bis 1 of Directive 2014/95/EU, which is included in the Management Report of the company.

## **2. Stakeholders**

The management of stakeholders has long been a strategic priority for EDP, which has anticipated the growing openness of companies to society in order to meet increasingly demanding ethical and transparency rules. EDP's management of stakeholders also applies to Hidrocantábrico Distribución Eléctrica, S.A.

The relations with the different stakeholders have also acquired an increasing relevance in the corporate world, as one of the ESG (Environment, Social, Governance) pillars, since they have been consolidated as one of the priority metrics for the investor community and society in general.

EDP's consistency and commitment to this strategy is clearly evidenced by its international recognition in the Dow Jones Sustainability Index as the best-in-class worldwide, as regards the climate strategy, innovation management, market opportunities, and corporate ethics criteria.

EDP upholds its commitment to retain the excellence achieved in this sphere, fostering dialogue with its stakeholders, adapting and improving its procedures, and incorporating different opinions in its action plans.

Thus, the management of stakeholders is conducted in accordance with the Stakeholder Relations Policy of the EDP Group.

This line of action is aimed at building and strengthening relationships of trust, sharing knowledge and relevant information, anticipating challenges, and identifying new opportunities for cooperation in the face of the challenges the EDP Group is confronting in all the geographical areas in which it operates.

The four major guiding commitments of the Policy are: to understand, to communicate, to trust, and to collaborate. The bases of the Relations Policy are:

### **TO UNDERSTAND**

Include, identify, prioritise

- We dynamically and systematically identify the stakeholders that influence and are influenced by EDP.
- We analyse and try to understand the stakeholders' expectations and interests in the decisions that directly affect them.

### **TO COMMUNICATE**

Inform, listen, reply

## **Hidrocantábrico Distribución Eléctrica, S.A.**

- We commit to promote a two-way dialogue with stakeholders, through information and consultation actions.
- We listen, inform, and reply to our stakeholders in a consistent, clear, rigorous, and transparent way, with the aim of forging close, solid, and lasting relationships.

### **TO TRUST**

Transparency, integrity, respect, ethics

- We believe that fostering an environment of trust with our stakeholders is crucial to establish steady long-term relationships.
- Our relationship with our stakeholders is based on values such as transparency, integrity, and mutual respect.

### **TO COLLABORATE**

Integrate, share, cooperate, inform

- It is our ambition to collaborate with the stakeholders in building strategic joint partnerships and to share knowledge, skills, and tools, thus promoting the creation of shared value in a distinguishing way.

The EDP Group's stakeholders are organised into four well-differentiated segments:

- 1. Value Chain:** Employees, Unions, Suppliers, Scientific Community, Customers, Consumer Associations, and Business Associations.
- 2. Market:** Competitors, Financial Entities, Shareholders, and Investors.
- 3. Democracy:** Government, Public Bodies, Regulatory Bodies, Parliament, Political Parties, and International Institutions.
- 4. Social and Territorial Context:** NGOs, Local Communities, Town Councils, Media, and Opinion Formers.

## **3. Materiality**

EDP's materiality analysis process is developed using a cross-cutting methodology common to the entire Group.

EDP conducts a 'Materiality Study' in order to identify the most relevant aspects for all the stakeholders, including both positive and negative aspects, either current or in the medium-long term. The main stages of this materiality process are described below:

### **STAGE 1: UPDATING OF THE MATERIAL TOPICS**

Based on cross-cutting sources and material topics from the previous year.

STAGE 2 - PRIORITISATION OF THE RELEVANT TOPICS FOR SOCIETY

**Identification of relevant topics for each group of stakeholders**

- Direct sources (direct listening)
- Indirect sources (public information)
- Cross-cutting sources (indices and studies)

STAGE 3 - PRIORITISATION OF THE RELEVANT TOPICS FOR THE BUSINESS

**Identification of relevant topics for the business**

Through the analysis of:

- Strategic business goals
- Business plans of the strategic areas
- Risk and Opportunity Management Policies and Reports
- Interviews with the Management

STAGE 4 - PREPARATION OF THE MATERIALITY MATRIX

**Intersection of relevant topics for Society v Business**

**Preparation of the Materiality Matrix**

STAGE 5 - ANALYSIS OF CRITICAL AND SENSITIVE TOPICS

**Main Materiality results**

In 2023, after having conducted sectoral comparative analyses, in addition to considering the analysis of international studies, we deem that no significant changes are expected in the weighing of the topics for our Stakeholders with respect to the previous year, and no new topics are expected to be included in the matrix. By way of summary, we show below the results obtained in the 2021 review, in which 21 categories are identified, grouped into 60 topics:



**RELEVANT CATEGORIES**

The following matrix is obtained from the analysis of the internal and external relevance. The matrix shown below is divided into 9 sections that represent the materiality level in each category.

The most relevant categories on an external level in 2021 have been:

1. Human and labour rights (93%)
2. Climate changes (93%)
3. Environmental management (89%)
4. Crisis management (88%)
5. Energy infrastructures (86%)
6. Vulnerable customers (86%)
7. Engagement with the local communities (83%)
8. Communication and transparency (82%)
9. Digital transformation (82%)
10. Sustainable mobility (79%)
11. Renewable energy promotion (79%)
12. Customer satisfaction and services (75%)
13. People management (75%)
14. Corporate governance (71%)
15. Innovation and research (71%)
16. Energy efficiency (71%)
17. Safety (70%)
18. Business ethics (67%)

The following matrix is obtained from the analysis of the internal and external relevance. The matrix shown below is divided into 9 sections that represent the materiality level in each category.



The most relevant categories on an internal level in 2021 have been:

1. Climate changes (98%)
2. Sustainable mobility (80%)
3. Supplier management (79%)
4. Environmental management (71%)
5. Digital transformation (69%)
6. Safety (68%)
7. Engagement with the local communities (67%)

**CRITICAL RELEVANCE**  
(very relevant for society and the business)  
**SENSITIVE TOPICS FOR THE BUSINESS**  
(very relevant for society and not much relevant for the business)  
**HIGH RELEVANCE**  
(medium-high relevance for the business and medium-low relevance for society)

**MEDIUM RELEVANCE**  
(medium relevance for society or medium relevance for the business)  
**LOW RELEVANCE**  
(low relevance for society and for the business)

The matrix is obtained from the analysis of internal and external relevance. It is divided into 9 sections that represent the materiality level in each category. The materiality level is determined by the degree of relevance for each line.

- **CRITICAL RELEVANCE** (very relevant for society and the business)
- **SENSITIVE TOPICS FOR THE BUSINESS** (very relevant for society and not much relevant for the business)
- **HIGH RELEVANCE** (medium-high relevance for the business and medium-low relevance for society)
- **MEDIUM RELEVANCE** (medium relevance for society or medium relevance for the business)
- **LOW RELEVANCE** (low relevance for society and for the business)

**4. Indicators and policies**

The most important policies of EDP España as regards sustainability indicators, which also apply to Hidrocantábrico Distribución Eléctrica, S.A., are:

- The Environmental Policy
- The Sustainable Development Principles
- The Stakeholder Relations Policy
- The Risk Management Policy
- The Occupational Health and Safety Policy
- The Human and Labour Rights Policy
- The Sustainable Procurement Policy
- The Diversity, Equity, Inclusion, and Belonging Policy
- The Code of Ethics

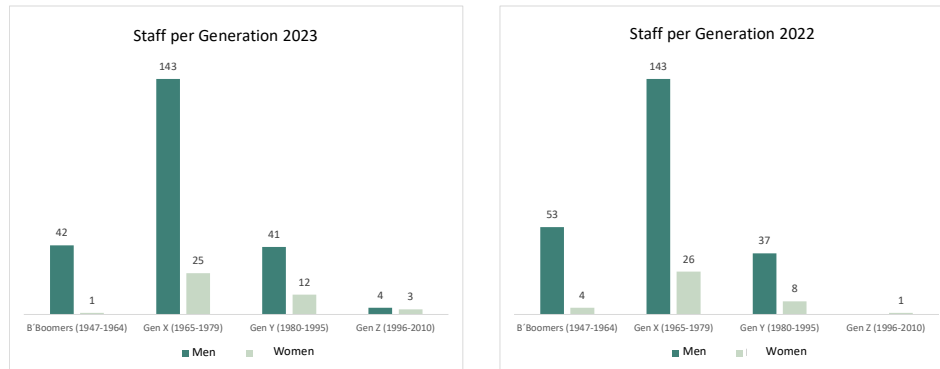
It should be noted that, in 2023, new policies have been published: The EDP Group Interest Representation Policy and the EDP Local Stakeholder Engagement Policy. They may be consulted on the website: [www.edp.com](http://www.edp.com)

## Hidrocantábrico Distribución Eléctrica, S.A.

The indicators completing the non-financial information reported by the EDP Group are described below.

### Distribution of Hidrocantábrico Distribución Eléctrica, S.A.'s staff

Hidrocantábrico Distribución Eléctrica, S.A., has, as at 31/12/2023, a staff of 271 employees, compared to its 272 employees as at 31/12/2022. Aware of the importance of gender diversity, it promotes the effective protection of female talent recruitment, through its Human Resources policies and practices.



### Annual average permanent, temporary, and part-time contracts per age and professional segment

Hidrocantábrico Distribución Eléctrica, S.A. is committed to stability in its recruitment - 100% of its recruits are under full-time permanent contracts, not existing any part-time permanent contracts. In 2023, the company approved the decision to implement a new Global Remuneration Policy for the entire EDP Group. Therefore, effective as of 1 January 2023, Hidrocantábrico Distribución Eléctrica, S.A. has adopted an employee organisational classification system through Job Grades, grouped by segments and job families. The job assessment methodology remains the same, but the presentation of the remuneration results per band, in the case of workers who are not covered by the collective bargain agreement, has changed, and Job Grades have replaced the former framework groups, whereas it does not affect workers covered by the collective bargain agreement in remuneration terms, because they are still subject to professional groups. As a consequence of the change in the framework methodology, the staff distribution, training, and remuneration charts corresponding to year 2023 cannot be compared to those of 2022.

Detailed Job Grades and Segments 2023

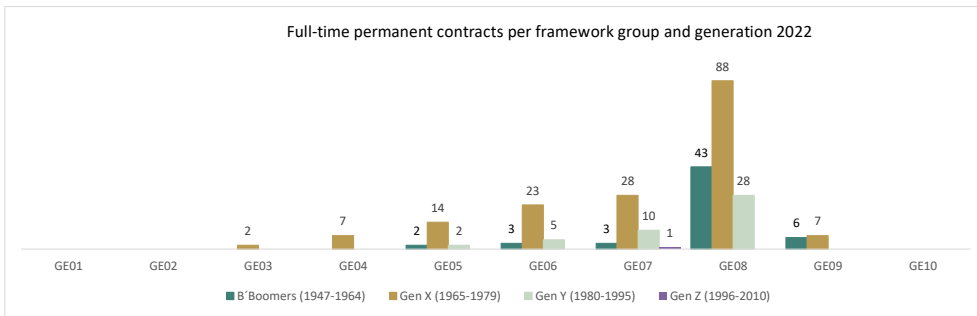
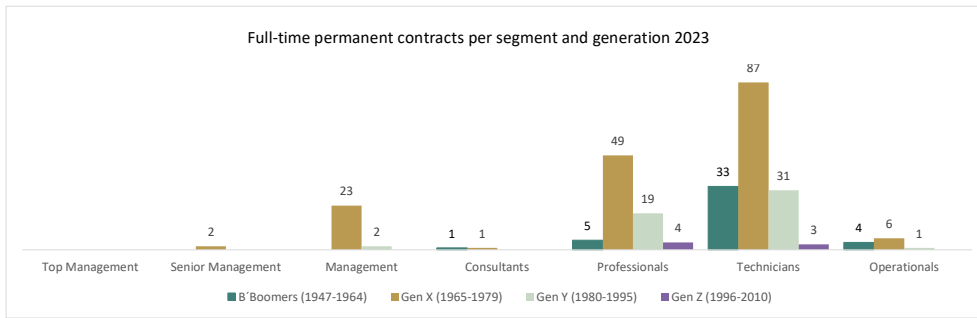
Job Grade	Segments	
25	Top Management-Top Consultant	Executives
24	Top Management-Top Consultant	
23	Top Management-Top Consultant	
22	Senior Management-Senior Consultant	
21	Senior Management-Senior Consultant	Managers
20	Senior Management-Senior Consultant	
19	Management-Consultant	
18	Management-Consultant	Specialists
17	Management-Consultant	
16	Professionals	
15	Professionals	Technicians, operators, and clerks
14	Professionals	
13	Technicians	
12	Technicians	
11	Technicians	
10	Operators	
9	Operators	
8	Operators	

Detailed Professional Groups 2022

Professional Group	
GE1	Executives
GE2	
GE3	
GE4	Managers
GE5	
GE6	Support, operational and administrative technicians
GE7	
GE8	
GE9	
GE10	

Hidrocantábrico Distribución Eléctrica, S.A. has not had any employees under a part-time permanent contract or a temporary contract in 2023, nor in 2022. This stability in recruitment is combined with the flexible hours offered by Hidrocantábrico Distribución Eléctrica, S.A. in order to achieve a real work-family life balance.

## Hidrocantábrico Distribución Eléctrica, S.A.

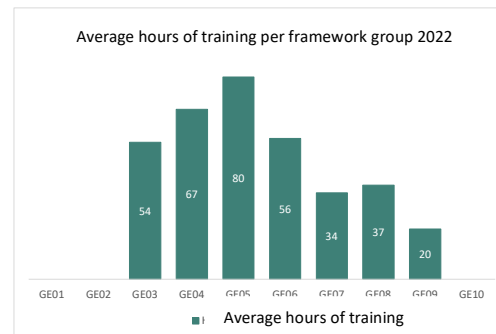
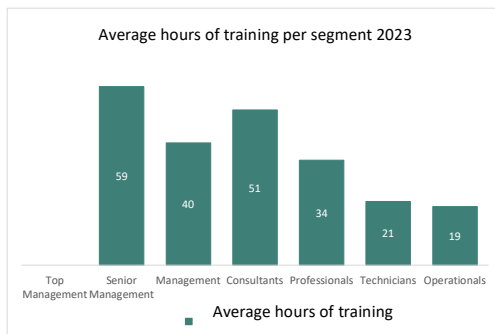


### No. of hours of absenteeism

Year	2023	2022
Hours of absenteeism	16,978.82	14,473.95

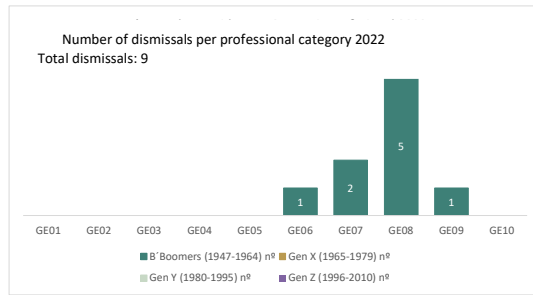
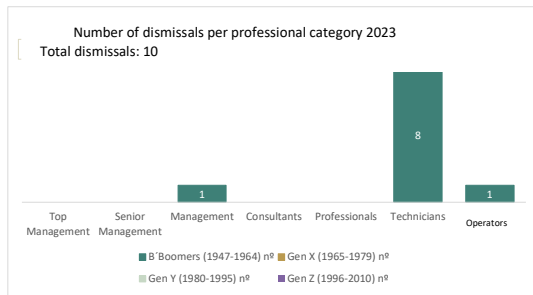
### No. of hours of training per professional segment

Its increasingly global position has led the EDP group to reconsider its Purpose and its Strategic Abilities with the aim of strengthening a single culture (One Company), progressing towards our goals, and guaranteeing a common and appealing experience for employees. This is why, in line with our commitment to the excellence of our employees, in 2023, the average training hours have exceeded 20 hours in most of the segments, like in 2022.



## Hidrocantábrico Distribución Eléctrica, S.A.

### No. of dismissals per professional segment

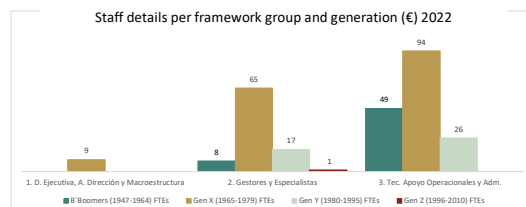
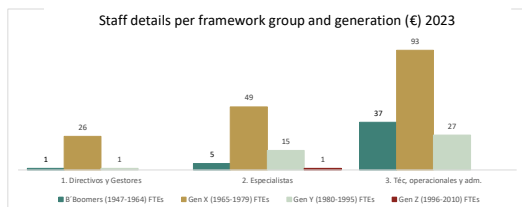
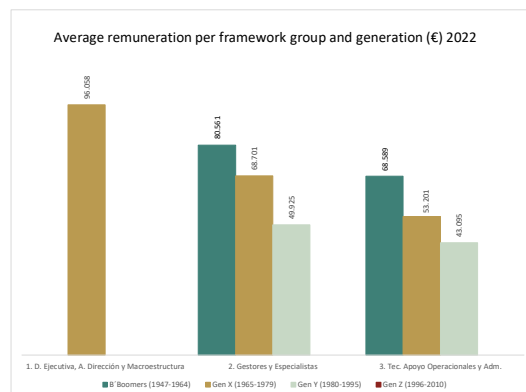
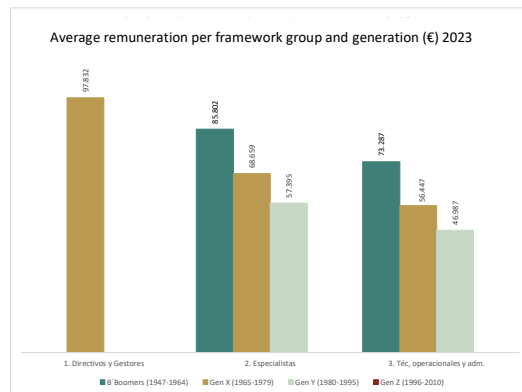


100% of the dismissals belong to the Baby Boomer Generation (1947-1964).

### Average remuneration and its development per age and professional classification

In Hidrocantábrico Distribución Eléctrica, S.A., the remuneration of the work is based on the skills, the performance, and the dedication of the people that are part of our organisation.

We believe that it is a continuous improvement road and, thus, the compensation and benefit system reflects our values and our culture.



The data regarding Z-Generation employees are not specified herein for the purpose of not disclosing individual data. The same applies to the Executives and Managers as regards Baby Boomers and the Y Generation. Likewise, for the purpose of standardising the figures in the calculation of the Average Remuneration, the people who have not been in the company throughout the year and those who were not employed on a full-time basis have been removed thereof.

## **Hidrocantábrico Distribución Eléctrica, S.A.**

### **Pay gap among equal positions**

As a principle, Hidrocantábrico Distribución Eléctrica, S.A. provides the non-existence of a pay gap under the collective bargaining agreement. Despite the foregoing, there are salary differences resulted from historic remuneration items, associated with age, customs, and practices of the energy sector, or from the bargaining agreement in effect at the time of the recruitment, something that tends to disappear as the people from these groups reach the retirement age. In year 2023, the absolute pay gap was 10.56% and in 2022, 10.86%.

### **Commitment to society and to local communities**

#### **Profits earned per country and taxes paid on profits**

The profits before taxes entirely earned in Spain are:

2023	€86,590,514.29
2022	€116,890,527.95

As regards the payment made by Hidrocantábrico Distribución Eléctrica, S.A in 2023 related the profit tax, the Company has paid €20,562,901.87 corresponding to the 2022 corporate tax. Likewise, as regards the payment made in 2022 related to the profit tax, the Company has paid €26,667,572.06 corresponding to the 2021 corporate tax.

#### **Aid received from the public administration**

No relevant subsidies were received in 2023, and, in 2022, the company €19,280.71.

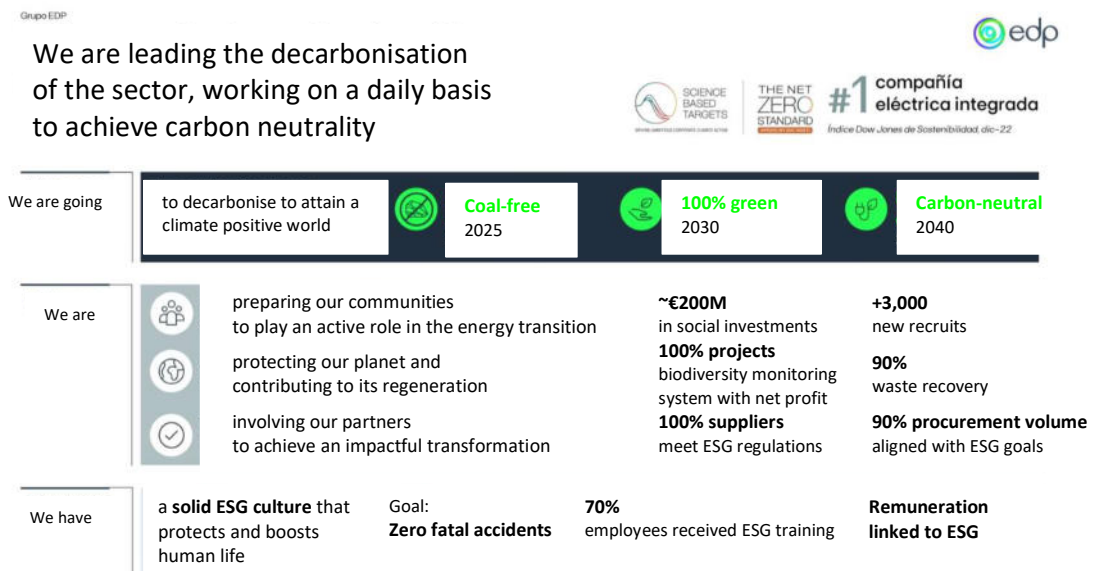
## 5. Goals

In March 2023, the EDP Group presented its new 2023-2026 strategic plan and its 2040 ambition, which are a revision of the 2022 sustainability goals and its respective 2021-2025 Plan. The 2023-2026 Sustainability Plan also applies to Hidrocarbónico Distribución Eléctrica, S.A.

Our ambitious 2023-2026 strategic plan is based on decarbonisation for a climate positive world, and it is focused on three main goals:

- Stop operating with coal by 2025
- Become a 100% renewable company by 2030
- Be Net Zero by 2040

This way, we strengthen our commitment to the energy transition and speed up our sustainable growth in the long term. At the core of this strategy is a global investment to boost renewable energies and strengthen our position in power grids, while simultaneously supporting our employees, customers, communities, shareholders, and partners to achieve a positive climate world.



### EDP Redes España 2023-2026 Sustainability Plan

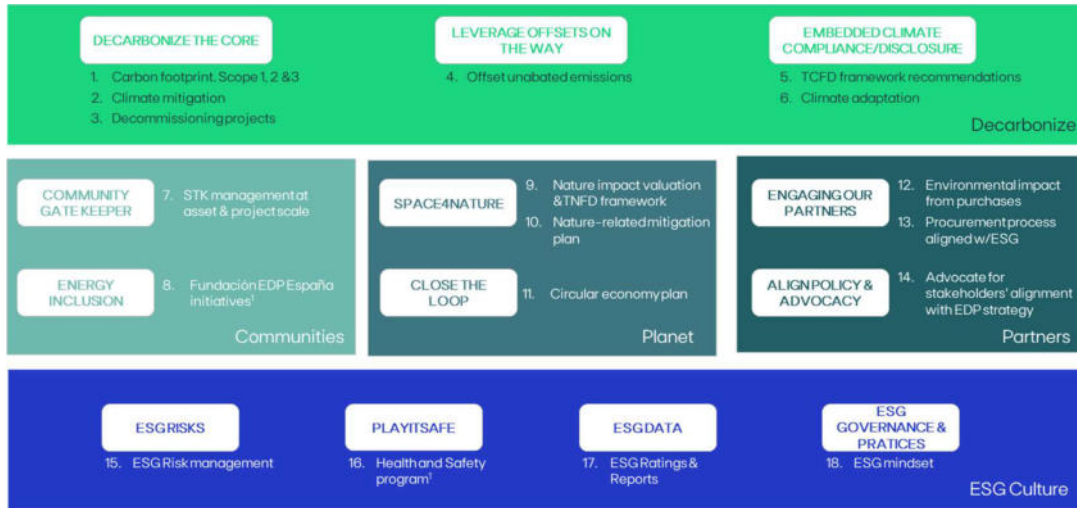
The EDP Group 2023-2026 global strategy, 2040 ambition, and EDP España 2023-2026 Sustainability Plan, as well as the topics identified as relevant for EDP Redes España in the materiality study, have been taken into consideration for the preparation of EDP España Sustainability Plan.

Following the approval and public launch of the EDP Group Strategic Plan, 'The Call for Changing Tomorrow Now', and taking into account the new Business Plans of the Generation, Grids, and Customers Platforms, the 2023-2026 Sustainability Plan has been prepared, both on a Group and Platform level, and it was presented to the Board last July 2023.

This plan is a firm and ambitious commitment that includes an unprecedented accelerated growth in renewable energies, based on our history of leaders of the energy transition. For EDP, it is not only about supplying energy to communities, but also training them so they can lead a more sustainable life. Likewise, we are committed to the protection of our planet, contributing to its regeneration, and to establishing partnerships with our partners to boost the energy transition, with appealing returns, excellence in ESG (Environmental, Social, and Governance) indicators, and higher value.

**Hidrocantábrico Distribución Eléctrica, S.A.**

After revising the EDP Redes España Sustainability Plan for the 2023-2026 period, 18 initiatives aligned with the EDP ESG Master Plan have been devised:



A quarterly ESG Report has been established to monitor the Plan.

6. GRI Chart

Hidrocantábrico Distribución Eléctrica, S.A. 2023 GRI CHART

Information required by the Non-Financial Information Act	Connection to GRI indicators
<b>Detailed information</b>	
Employment	
Total number and distribution of employees considering diversity-representing criteria (gender, age, country, etc.)	2-7 Information about employees and other workers 405-1 Diversity in governing bodies and employees
Total number and distribution of employment contract types, annual average permanent contracts, temporary contracts, and part-time contracts per gender, age, and professional classification	2-7 Information about employees and other workers
Number of dismissals per age and professional classification	401-1 Newly-recruited employees and staff turnover
Average remuneration and its development categorised by gender, age, and professional classification or equivalent value	2-21 Ratio of total annual compensation 2-21 Ratio of the percentage increase in the total annual compensation



**Hidrocantábrico Distribución Eléctrica, S.A.**

Information required by the Non-Financial Information Act	Connection to GRI indicators
Pay gap, remuneration of equal positions, or average remuneration of the company	405-2 Ratio of the base salary and remuneration of women compared to men
<b>Work organisation</b>	
Number of hours of absenteeism	403-2 Types of accidents and accident frequency rate, occupational diseases, days missed, absenteeism, and number of deaths by occupational accident or disease
<b>Training</b>	
The total hours of training per professional category	404-1 Average hours of training per year per employee
<b>Detailed information</b>	
<b>Company's commitments to sustainable development</b>	
The impact of the company's activity on local populations and the territory	413-1 Operations involving the participation of the local community, impact assessments, and development programmes