



# **Annual Evaluation Report of the Corruption Risk Prevention Plan and Related Offenses – 2024**

## **EDPR – Portugal**

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## I. Framework

Following the approval of the 2020–2024 National Anti–Corruption Strategy, Decree–Law No 109–E/2021 was published on December 9th of 2021 in the Official Gazette, creating the National Anti–Corruption Mechanism ("MENAC") and approving the General Regime for the Prevention of Corruption ("RGPC").

In order to prevent, detect, and sanction acts of corruption and related offenses, the RGPC establishes the obligation for entities, both public and private, required to comply with it, to adopt and implement a Compliance Program that must include a corruption and related offenses risk prevention plan (hereinafter "PPR").

EDPR has been maintaining and introducing improvements in the mechanisms in this area through a Specific Compliance Program, the Integrity/Anti–Corruption Compliance Program, applicable to the various companies within EDPR. This program strengthens the general principles of conduct and duties of the companies, their employees, and business partners regarding illicit acts, corruption practices, or related offenses, as outlined and defined in the EDPR Integrity Policy.

In July 2022, in accordance with the provisions of the RGPC, the PPR was formalized and disclosed, reflecting the work carried out within the scope of the already implemented System. Considering the scope of application of the RGPC, within EDPR, the PPR applies to EDPR PT – Promotion and Operation, S.A. (hereinafter EDPR PT PO) as it is a company based in Portugal that employs more than 50 employees.

The PPR presents the identification and classification of factors that may expose EDPR PT PO to acts of corruption and related offenses, as well as the control mechanisms, preventive and corrective measures in place to mitigate these risks. It is subject to review every 3 years or whenever a significant change occurs that justifies it.

This Annual Evaluation Report, for the year 2024, aims to address the obligation set out in the RGPC to monitor the implementation of the PPR. The PPR is available through the [link](#) or can be accessed via the Intranet or on EDPR's official website. This report presents the quantification of the implementation degree of the identified preventive and corrective measures, as well as their current status of progress, in a continuous improvement approach.

## **II. Control Mechanisms**

As mentioned in the PPR, for all identified corruption risks and related offenses, preventive and corrective measures have been implemented to reduce the likelihood of occurrence and the associated impact. Even though the need for additional mitigation mechanisms was identified, various Compliance actions were reinforced in a continuous approach to improvement.

In this sense, throughout the year 2024, the following initiatives were carried out:

### **a) Training and Awareness**

Regarding the awareness of employees on the topic of corruption risk prevention, and within the scope of the training plan for 2024, several initiatives were developed with the aim of reinforcing the culture of ethics and compliance within the EDP Group.

The training “How I Met Integrity II” was launched as a continuation of the previous edition, “How I Met Integrity I”, which started in 2022. This training recreates everyday professional situations in which employees face integrity dilemmas. In each scenario, participants are challenged to apply the integrity policy and corresponding procedures, demonstrating their understanding of the fundamental principles of these documents. The main goal of this training is to encourage reflection on situations that may involve illegal acts or inappropriate/ unethical conduct, ensuring that employees understand how to act in compliance with the EDP Group's Integrity Policy.

In this sense, within the scope of the training plan, the “Avoid Harassment Training” was launched, aimed at empowering employees to identify and prevent harassment behaviors in the workplace. This training aims to raise awareness about EDPR's commitment to preventing harassment, clarify the consequences associated with such behaviors, and inform about the appropriate channels to report such situations.

Additionally, awareness and sensitization actions on Ethics and Compliance topics were carried out, with highlights including the celebration of the International Anti-Corruption Day and the Compliance Officer Day.

Furthermore, the process of identifying internal training needs was maintained, resulting in the delivery of online training on integrity policies and procedures, targeted at the areas where there was a need for reinforcement in certain aspects. These initiatives reflect EDPR's ongoing commitment to reinforcing the culture of integrity and compliance within the organization.

## **b) Review of Internal Regulations**

Based on the risk assessment, as well as the experience gained from the implementation of various internal Compliance regulations (policies, standards, and procedures) relevant to corruption prevention, a set of regulations was reviewed, including the following: Whistleblowing Management Policy, Social Investment Policy, Compliance Standard, Internal Control System for Financial Reporting Standard, Offers and Events Procedure, Social Investment Procedure, and a new Compliance Due Diligence Procedure for entering new geographies was approved.

## **c) Monitoring and Auditing**

In addition to the continuous monitoring and supervision of the implemented mitigation measures, from September to November 2024, in order to strengthen the monitoring of their effective implementation and in compliance with the procedure for maintaining the EDPR certification in accordance with the ISO 37001 standard – Anti-Bribery Management Systems, two external audits were carried out on the Specific Integrity Compliance Program / Anti-Bribery Management System. The objectives were of (i) identifying any compliance gaps with the standards, including reviewing the adequacy of the risk and control matrix, (ii) performing tests on the implemented controls/mitigation measures based on a defined testing plan to assess their adequacy and effectiveness in mitigating risk, and (iii) identifying any recommendations/opportunities for improvement, it was concluded that:

- The Specific Integrity Compliance Program / Anti-Bribery Management System is aligned with the requirements of the ISO 37001 standard.
- The methodology adopted for identifying corruption risks and their impact analysis/assessment is adequate.
- The controls/mitigation measures tested were considered adequate and effective.

Similarly, in January 2025, the entity AENOR conducted the external audit for the maintenance of EDPR's Compliance Management System and Anti-Bribery Management System certification and confirmed the implementation of the systems in accordance with the requirements specified in the corresponding ISO standards, with no non-conformities identified

### **III. Conclusion**

Overall, based on the continuous monitoring of the control mechanisms/mitigation measures implemented within the scope of the PPR, as well as the results of the internal and external audits conducted by independent entities on EDPR's Specific Integrity Compliance Program, it is possible to conclude that, in all materially relevant aspects, the identified preventive and corrective measures have been implemented adequately and effectively.

Therefore, the residual risk assessment of the risk factors identified in the PPR remains valid and at acceptable levels, with no situations of high risk.

### **IV. Final Provisions**

The publicity of this Annual Evaluation Report is ensured to EDPR employees through the intranet and the official EDPR website.