**Company Name** EDP

Overall Score Before appeal: 34

After appeal: 38

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that BHRRC could not find information *in public sources* that met the requirements *as described in full* in the Renewable Energy & Human Rights Benchmark Methodology document.

Please also note that indicators A through C are the core UNGP indicators from the <u>Corporate Human Rights Benchmark</u>. Detailed guidance outlining the methodology for those indicators, including accepted language and phrasing, can be found <u>here</u>.

### **Detailed assessment of amended scores**

#### A. Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation (original)	BHRRC response
A.1.1	Commitment to respect human rights	Original: 1  After appeal: 2	The individual elements of the assessment are met or not as follows: Score 1 - met: public policy committing to respect human rights or the ten principles of the UN Global Compact or the rights under the UDHR. "EDP's policy is inextricably linked to the respect we have for the Human Rights of our employees, partners and other stakeholders. EDP has joined the Global Compact Initiative in 2004 and annually reports its practices and progress under this UN initiative."  Score 2 - not met: policy committing to UNGPs or OECD Guidelines for MNEs.  Links referenced: https://www.edp.com/en/sustainability/social-dimension/human-rights  https://www.edp.com/sites/default/files/ethics_code.pdf	We note that on review EDP does have a policy committing to the UNGPs under its code of ethics (dated 2013) on p.12: "EDP undertakes: - to respectthe Guiding Principles on Business and Human Rights"  Therefore Score 2 is met and EDP should be awarded one additional point under indicator A.1.1, for a total of 2 points.

# C. Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation (original)	BHRRC answers
C.2	Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities	Original: 1  After appeal: 1.5	The individual elements of the assessment are met or not as follows: Score 1 - met: one or more channel(s)/mechanism(s) accessible to external individuals. See link to Ethical Ombudsman.	Since complainants are not limited to choosing among the listed companies in the drop-down menu, the second component of Score 2 is met. Therefore, we will update the score to reflect a score of 1.5 under this indicator.
			Score 2 - not met: description of how the Company ensures the channel(s)/mechanism(s) is available to all potentially affected external stakeholders and in local languages - not met: ability for workers to raise complaints or concerns about human rights issues at the Company's suppliers or supplier expectation. The Ethical Ombudsman channel requires the complainant to select from a list of EDP companies specifically, which does not leave room for complaints about suppliers.  Links referenced:  https://www.edp.com/en/contact-ethics-ombudsman	

# D. Indigenous Peoples' and Affected Communities' Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation (original)	BHRRC review	
D.2	Commitment to respect all affected	Original: 0	The individual elements of the assessment are met or not as follows:	In reviewing score 1, we used the following <u>stakeholder policy</u> . This policy states: "Understand, Communicate, Trust and Collaborate	
	communities' rights	After appeal:	Score 1		
		0.5	- not met: policy committing to respect the rights of all affected communities. The Company's Code of Ethics includes information about engaging with affected communities but does not explicitly commit to respecting their rights.	3. Trust: Transparency, Integrity, Respect, Ethics Inform Stakeholders about the economic, environmental and social impacts of the organisation of a particular project, that might have a significant impact on them;	
			<ul> <li>not met: regular publishing of information on policy implementation</li> <li>not met: description of approach to respecting affected community rights</li> </ul>	Respect the opinions and rights of Stakeholders, treating them fairly, without discrimination, with respect for diversity and their legal rights;"	
			Score 2 - not met: supplier expectation - not met: implementation reports published in relevant	Based on this language, EDP meets the first component of Score 1. Accordingly, EDP should receive 0.5 under Score 1.	
			languages	On Score 2:	
			Links referenced: <a href="https://www.edp.com/sites/default/files/ethics">https://www.edp.com/sites/default/files/ethics</a> code.pdf	We reviewed the <u>supplier code of conduct</u> , however we did not find this policy to contain language requiring suppliers to respect the rights of all affected communities. Further, the policy does not refer back to EDP's stakeholder policy. Accordingly, none of the components of Score 2 are met.	
				As a result, EDP's score on indicator D2 should be 0.5	

## EDP Overall score:

	Total Scored Points (out of 66)	CHRB Core UNGP Indicators Score (out of 26)	Sector-specific Indicators Score (out of 40)	Weighted Percentage
Original	20	14	6	34%
After appeal	22	15.5	6.5	38%