

INDEPENDENT VERIFICATION REPORT ON THE PARTIAL  
NON-FINANCIAL INFORMATION STATEMENT FOR FINANCIAL YEAR  
2021

**EDP ESPAÑA, S.A.U.**

## INDEPENDENT VERIFICATION REPORT ON THE PARTIAL NON-FINANCIAL INFORMATION STATEMENT OF EDP ESPAÑA, S.A.U. FOR THE FINANCIAL YEAR ENDED ON 31 DECEMBER 2021

To the Sole Shareholder of EDP ESPAÑA, 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 EDP ESPAÑA, S.A.U. (hereinafter, the Company) corresponding to the financial year ended on 31 December 2021, 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 '2021 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 '2021 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 2021 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 2021.



- 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 2021.
- 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 2021 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 EDP ESPAÑA, S.A.U. corresponding to the financial year ended on 31 December 2021 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 EDP ESPAÑA, 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. EDP ESPAÑA, 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

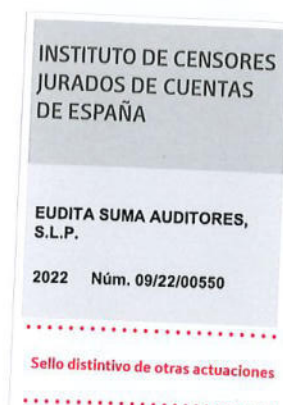
This report has been prepared to meet the requirement established by the commercial regulations in force in Spain; hence, it may not be appropriate for other purposes and jurisdictions.

Eudita SUMA Auditores, S.L.P.



Pablo Rodríguez Otero

Oviedo, 19 April 2022



**EDP ESPAÑA, SAU**

**EDP España, SAU**

Management Report

Appendix- Partial non-financial information 2021

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## **1. Introduction**

EDP España, S.A.U. 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 Statement 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, as compared to the one required by articles 19. Bis 1 and 29. Bis 1 of Directive 2014/95/EU.

## **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.

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 the society in general.

EDP's consistency and commitment to this strategy is clearly evidenced by its international recognition as the best-in-class, for the fifth year in a row, in the Dow Jones Sustainability Index' stakeholder engagement and influence on policies 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 Relationship 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 Relationship 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

- 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, Local Authorities, Media and Opinion Formers.

## **3. Materiality**

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

A 'Materiality Study' is conducted on a yearly basis 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 THE SOCIETY**

#### **Identification of relevant topics for each stakeholder**

- 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

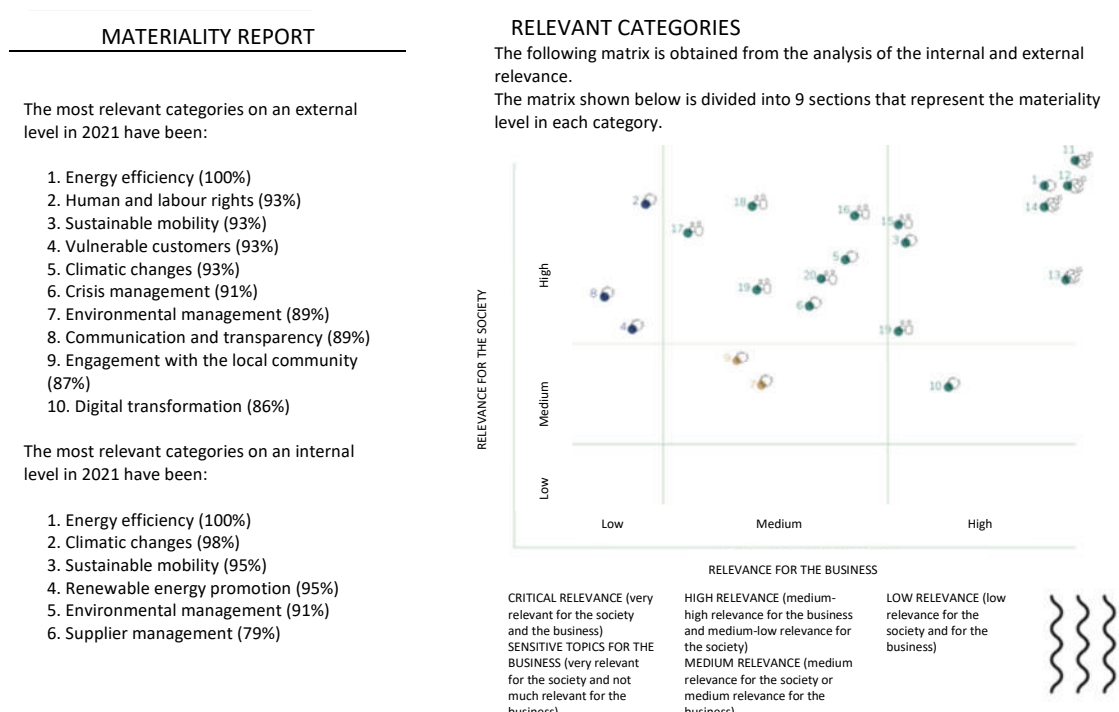
### Intersection of relevant topics for Society v Business

### Preparation of the Materiality Matrix

## STAGE 5 - ANALYSIS OF CRITICAL AND SENSITIVE TOPICS

### Main Materiality results

In 2021, it has identified 21 categories grouping 60 topics, as in the previous financial year.



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 of each line.

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

#### 4. Indicators and policies

The most important policies of EDP España as regards sustainability indicators are:

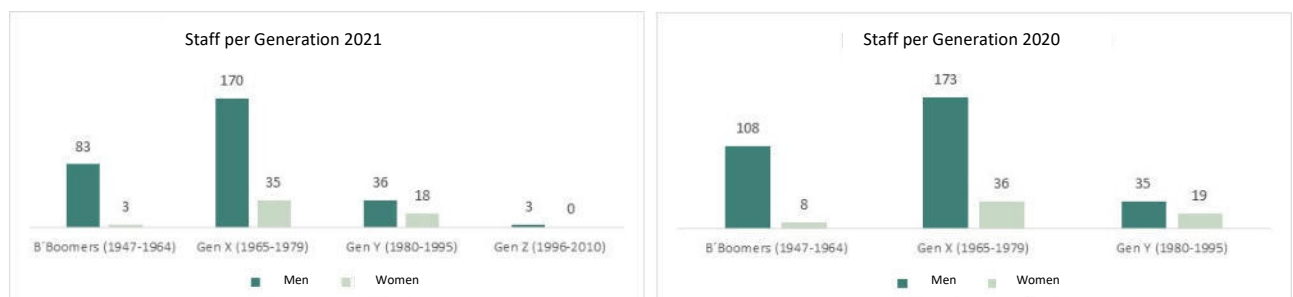
- The Environmental Policy
- The Sustainable Development Principles
- The Stakeholder Relationship Policy
- The Risk Management Policy
- The Occupational Health and Safety Policy
- The Human and Labour Rights Policy
- The Training Policy
- The Sustainable Procurement Policy
- The Diversity Policy

They may be checked on the website [www.edp.com](http://www.edp.com)

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

##### Distribution of the staff per generation

EDP España, S.A.U. has, as at 31/12/2021, a staff of 348 employees, compared to 379 as at 31/12/2020. Aware of the importance of gender diversity, it promotes the effective protection of female talent recruitment, through its Human Resources policies and practices. The female presence in younger generations represents 33.33% in 2021 in the Generation. Therefore, it complies with the provisions set out in article 82 'Positive action to favour female employment' of the 3<sup>rd</sup> Bargaining Agreement of the EDP España Group ([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)).



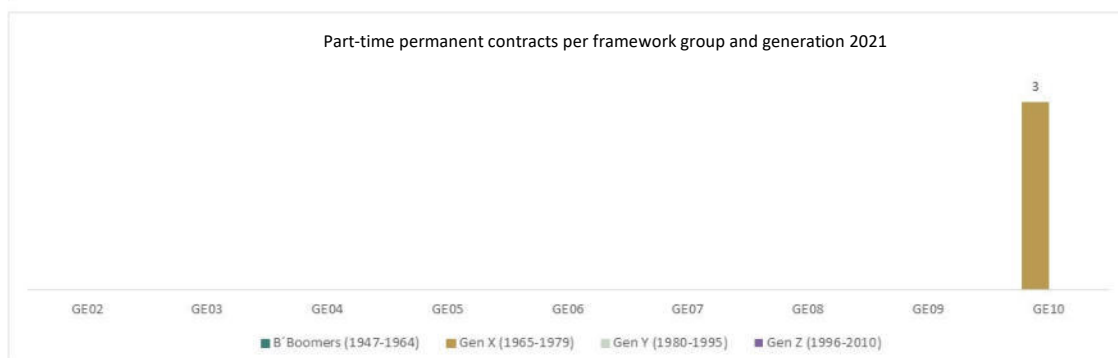
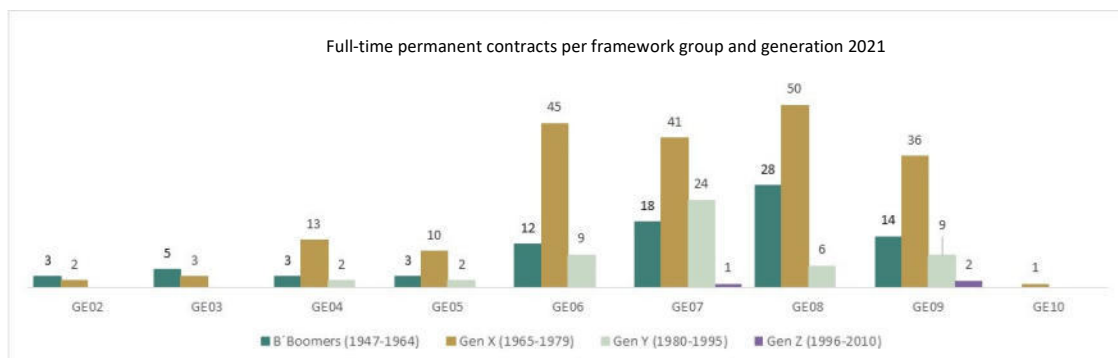
There is a decrease in the staff between 2020 and 2021 resulted from retirements (50% corresponding to the Generation Platform and 50% corresponding to natural wastage) or from the transfer of some employees to other companies of the Group (5 to EDPR).

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

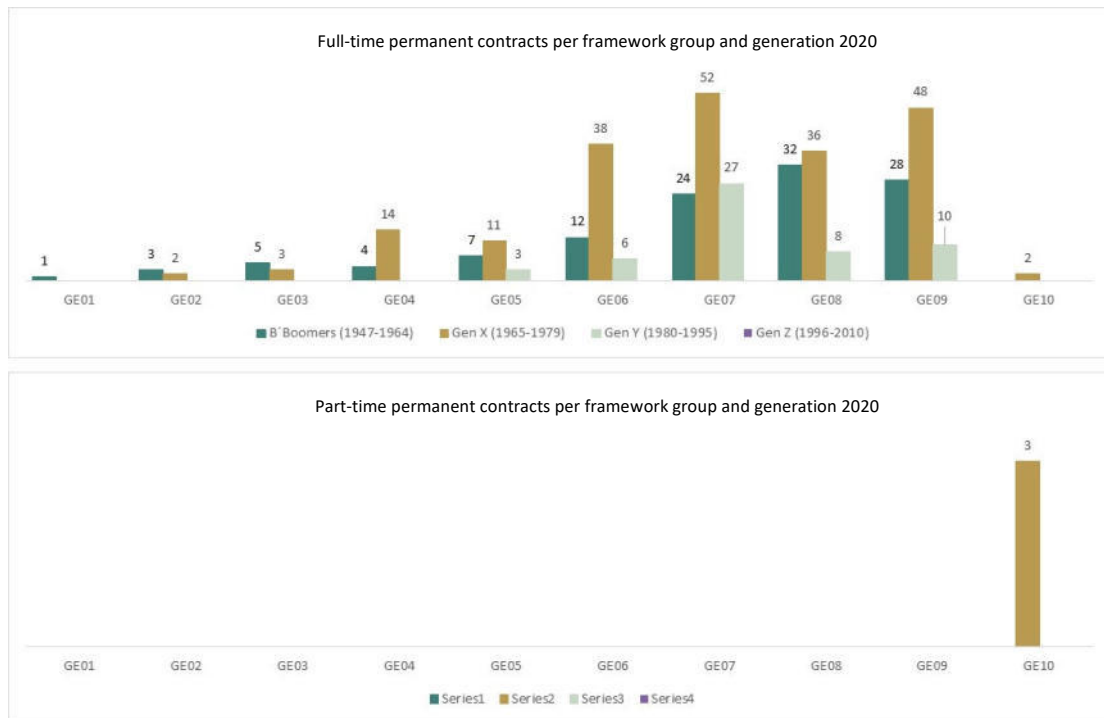
EDP España, S.A.U is committed to stability in its recruitment and thus, more than 99% of its newly-employed staff are under full-time permanent contracts.

EDP España, SAU has established a system for the professional classification of employees based on professional groups (Framework Groups), comprising, each of them, the professional skills, qualifications and general content of the service provided, and it may include different tasks, duties, professional specialisations or responsibilities assigned to the employee.

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



## EDP ESPAÑA, SAU



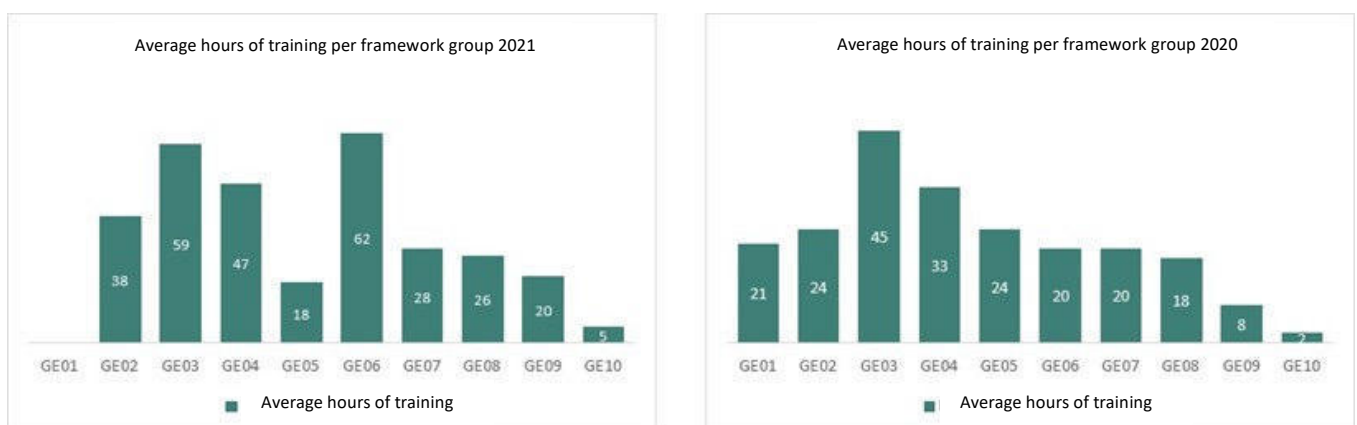
EDP España, S.A. did not employ workers under a temporary contract. This stability in recruitment is combined with the flexible hours offered by EDP España, S.A.U in order to achieve a real work-family life balance.

### No. of hours of absenteeism

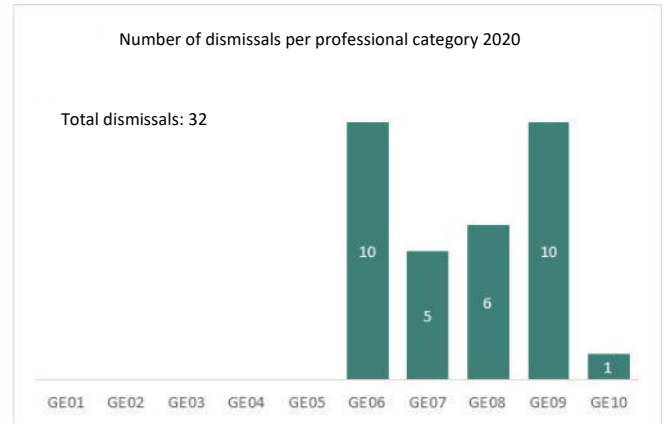
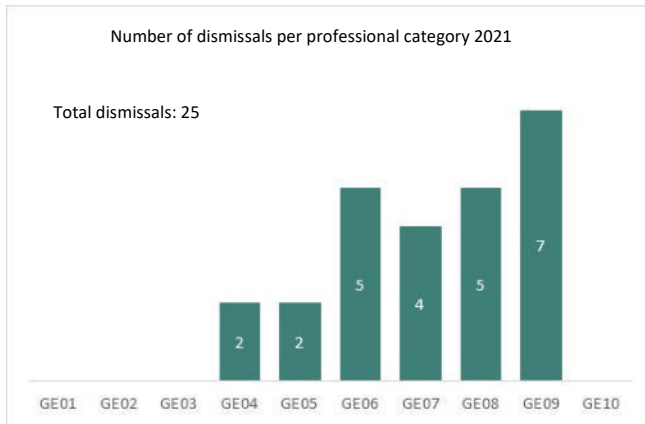
Year	2021	2020
Hours of absenteeism	23,273.30	32,744.70

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

In the atypical pandemic context of year 2021, there has been an increase in the global number of hours of training taught, as compared to 2020. This fact has been reflected in the number of training hours per framework group, which has been increased practically in almost every case. In order to protect the employees' health, the company fostered virtual/online training actions with more appropriate conditions in terms of duration and participants as compared to those of the original face-to-face format.



## No. of dismissals per professional category

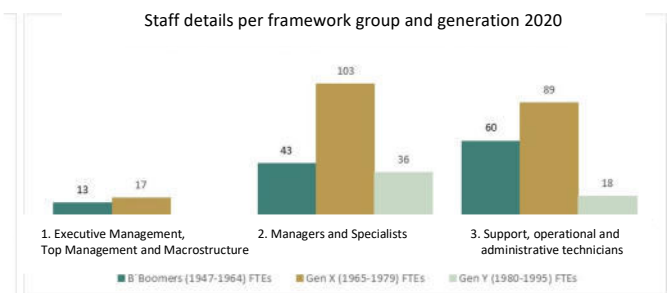
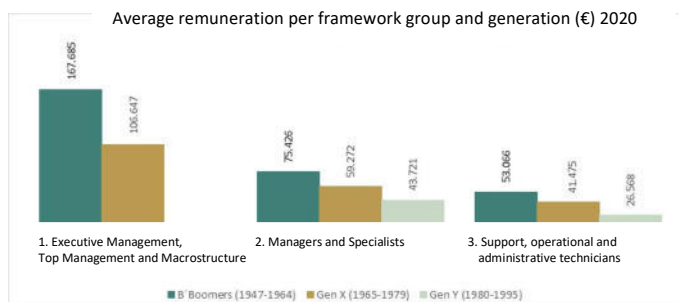
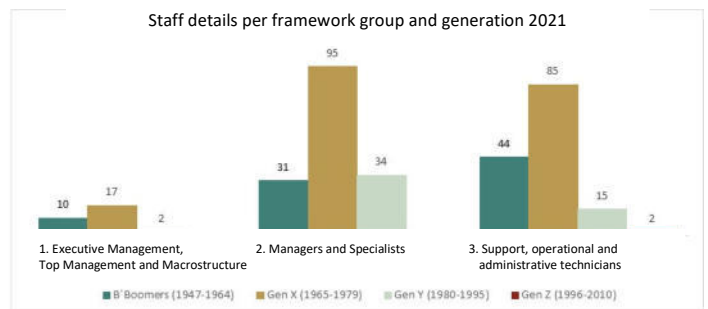
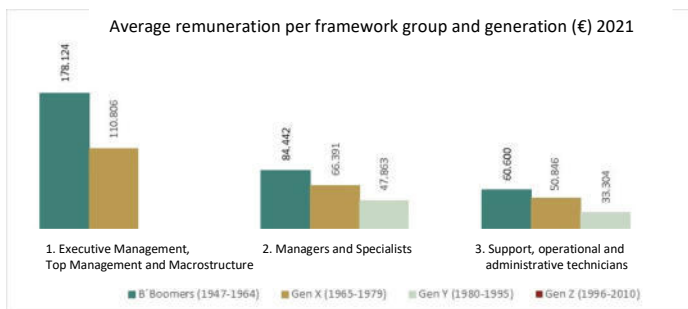


Both in the case of 2020 and 2021, 100% of the dismissals belong to the Baby Boomer Generation (1947-1964).

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

In EDP España, S.A.U, the remuneration of the work is based on the skills, the performance and the dedication of the people that are part 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 2021 remuneration data regarding the Y Generation in Group 1. Executive Management, Top Management and Macrostructure are not specified herein, and neither are the data concerning the Z Generation, for the purpose of



not disclosing individual data. 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 2021 and those who were not employed on a full-time basis have been removed thereof.

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

As a principle, EDP España, S.A.U provides the non-existence of a pay gap under the 3<sup>rd</sup> Bargaining Agreement of the EDP España Group ([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)) in its article 76 'Equality Plans'.

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 2020, the absolute pay gap, without taking into account same-category positions, was 14.99% and, in 2021, 19.09%. It should be highlighted that 100% of the remuneration items are included in 2021.

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

##### **Contributions made to foundations and non-profit organisations**

On an annual basis, a contribution is made to the Foundation, which is approved by the Board of Directors:

Contribution approved in 2021 for 2022	€ 2,578,247
Contribution approved in 2020 for 2021	€ 2,809,567

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

The profits before taxes entirely earned in Spain are:

2021	€157,367,083
2020	€1,393,078,000

As a consequence of the Company's integration into the tax group of EDP Sucursal en España, as regards the payment of the tax on profits, the Company has made, in 2021, payments for an amount of 5,295,047.65 euros on the profits of 2020. In 2020, there was no corporate tax payment.

**Aid received from the public administration**

No relevant subsidies were received in 2021 or in 2020.

**5. Goals**

In March 2019, the EDP Group established the 2022 sustainability goals and 2030 ambition, which are a revision of the 2020 sustainability goals. In December 2020, the main lines of the new 2021-2025 Sustainability Plan were approved.

2030 ambition is organised around the ESG criteria and its three main lines – environment, social and governance – on which EDP has been working for the past years, leading the energy transition with carbon-neutral goals, 100% renewable generation, sustainable consumption, innovation and digital transformation, just transition and mitigation of climate risks and resilience, with a positive impact on circular economy, natural capital, biodiversity, sustainable procurement and social policy and diversity.

## ESG Outlook 2025-2030

		2020	2025	2030
 ENVIRONMENT	Revenues aligned with EU taxonomy (%)	58	~70	>80
	Scope 1 & 2 Emissions (gCO <sub>2</sub> /kWh)	157	~100	0
	Renewables Generation (%)	74	~85	100
	Coal Installed Capacity (%)	8	0	0
	Total Waste (kt)	309	118	30
 SOCIAL	Employee Engagement (top tier company)	✓	✓	✓
	Female Overall (%)	25	30	35
	Accident frequency rate <sup>1</sup>	1.74	1.55	<1
	SDGs Social Investment (EUR Mn) <sup>2</sup>	12.4	50	100
 GOVERNANCE	Female on Leadership (%)	25	30	35
	Top Management ESG & equity linked compensation <sup>3</sup>	✓	✓✓	✓✓
	Cybersecurity (rating)	800	Keep advanced cybersecurity BitSight rating <sup>4</sup>	
	Top quartile in ESG rating performance <sup>5</sup>	✓	✓	✓

1. Number of work accidents per million hours worked (included employees and contractors); 2. Excluding 2020 onwards, values accumulated since 2021; 3. Applicable to Board of Directors and top management changes in Board of Directors dependent of General Shareholders Meeting; 4. >= 740; 5. Includes DJSI, FTSE4Good, MSCI and Sustainalytics  
 Note: Includes Vasego's Preclaimant

## EDP España 2021-2025 Sustainability Plan

EDP Group's 2021-2025 global strategy and 2030 ambition, as well as the topics identified as relevant for EDP España in the materiality study, have been considered for the preparation of EDP España's Sustainability Plan.

The 2021-2025 Sustainability Plan has been approved by the Board of Directors of EDP España Monographic Meeting on Environmental Information as recorded in the minutes of 18 December 2020, and it includes the following initiatives:

**1. Clean generation**

Reduce the CO2 footprint (scope 1, 2 &3)

Revise the supply chains to reduce the footprint

Offset the emissions of EDP España's activities where it cannot be reduced

**2. Sustainable consumption**

Initiatives to improve customer satisfaction

Develop the energy efficiency plan in end customers

Develop the business plan for decentralised solar generation

Transfer the CO2 footprint to the customer and offset CO2 emissions

Develop the mobility business plan

Management strategy for the light vehicle fleet

Promote the development of smart grids

**3. Innovation and digital transformation**

Develop the Innovation Plan

Promote digitisation among employees: training and awareness

Adapt the relationship with customers to the 'Digital customer'

Digitisation of the society: digital gap

**4. Circular economy**

Implement the circular economy Plan

Reduce water consumption

**5. Natural capital**

Reduce atmospheric emissions

Action Plans for biodiversity

Develop the Natural Capital Guide and prepare an action plan

**6. Diversity and well-being**

Implement the diversity policy on the EDP Group in Spain

Promote transparency on equality matters

Initiatives to improve the employees' engagement

Implementation of the Safety Culture Plan and promotion of the preventive performance measure

Design and implement an emotional health plan

Incorporate the new ways of working/teleworking

**7. Sustainable procurement**

Incorporate Sustainability into procurement: training and monitoring

Develop the supplier's voice: monitor channels and implement the resulting actions

**8. Inclusive society**

Develop the action plan with local communities

Extend the presence of business expansion in local communities

Implement the Just Transition Plan and support the economic activity and local employment

Develop the Plan of the EDP España Foundation

Align the volunteering actions with the social investment policy of the EDP Group

**9. Adaptation and resilience**

Implement the climate change adaptation plan

**10. Recognition of Sustainability**

Spread the Sustainability Plan on an internal and external level

Measure the direct and indirect impact of the actions on Sustainability

Improve the recognition of EDP España as regards ESG values

**Revise EDP's positioning vis-à-vis sustainable brands and greenwashing risk**

Include EDP's positioning in sustainability in the commercial process

## 6. GRI chart

## EDP ESPAÑA 2021 GRI CHART

Information required by the Non-Financial Information Law	Connection to GRI indicators
Detailed information	
Employment	
Total number and distribution of employees considering criteria representing diversity (gender, age, country, etc.)	102-8 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	102-8 Information about employees and other workers
Number of dismissals per age and professional classification	401-1 Newly-recruited employees and rotation of staff
Average remuneration and its development categorised by gender, age and professional classification or equivalent value	102-38 Ratio of total annual compensation 102-39 Ratio of the percentage increase in the total annual compensation



Information required by the Non-Financial Information Law	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 vis-à-vis men
<b>Work's 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