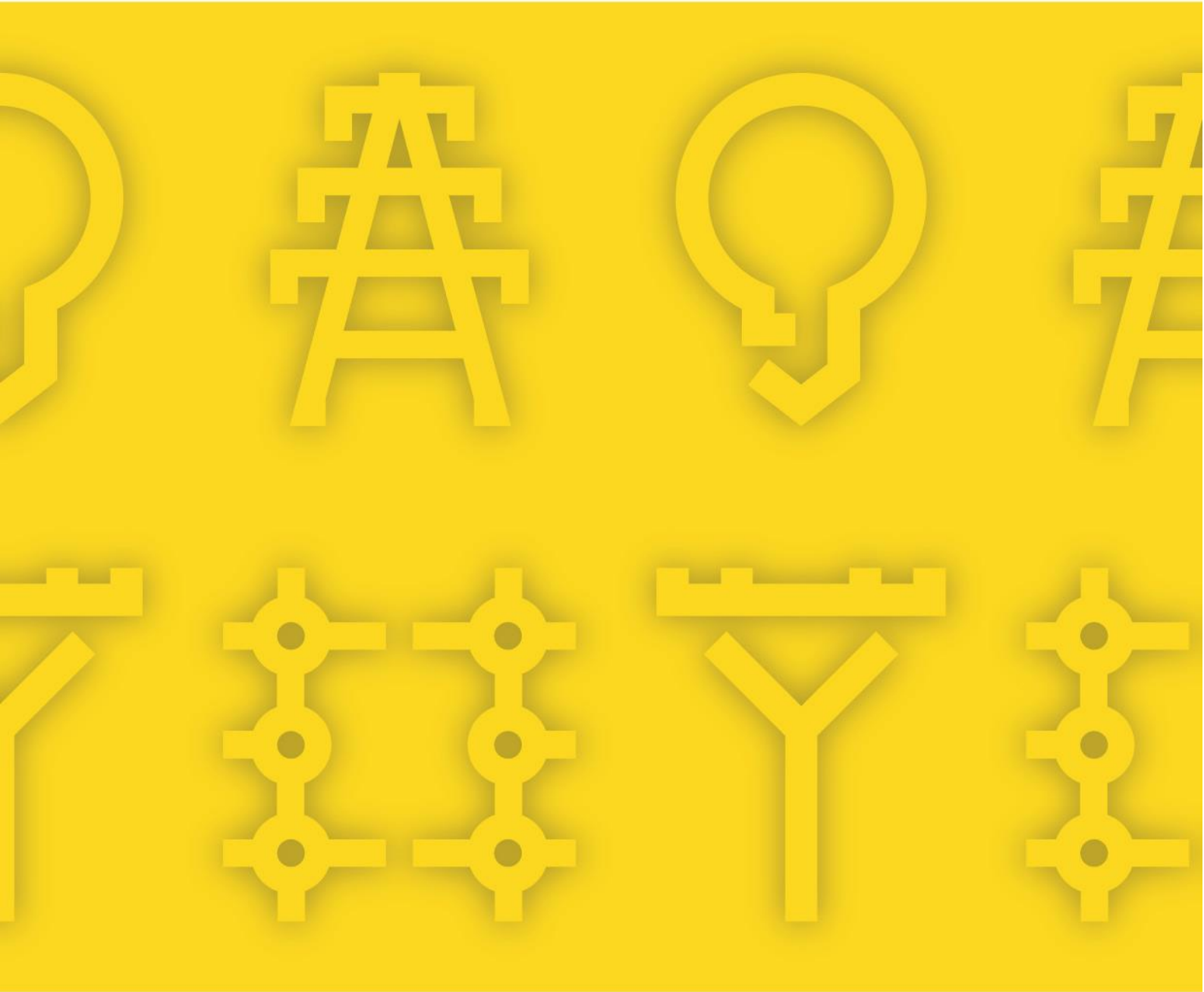


# 2023

## Customer Ombudsman Annual Report



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## 1. Message From the E-REDES Customer Ombudsman

During 2023 the number of claims has increased significantly due to three major reasons:

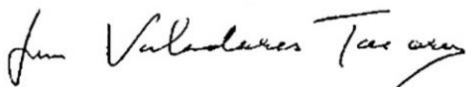
- a. Persistent lack of readings for active clients with long periods to overcome the lack of such information;
- b. Increasing damages related to unplanned interruptions;
- c. Increasing number of no-shows for visits regarding replacement of meters.

The disagreements concerning legal interpretations of E-REDES pointed out in the beginning of 2023 were overcome during 2023. The number of complaints sent to E-REDES increased significantly and their processing time remained quite low.

The satisfaction indicators of clients were kept high despite several challenges related to the higher complexity of the management of grids also serving solar production, the massive wave of meters replacement and the need of rehabilitating important sections of the grid.

During this challenging period, the cooperation and the commitment of E-REDES Board and the E-REDES team related to the management of services should be underlined and special thanks are due to the Director of Clients (J. F. Nunes) as well as to the team supporting the work of the Ombudsman (Miguel Gordinho, Pedro Gama and Luís Miguel Fernandes).

Luís Valadares Tavares, E-REDES Customer Ombudsman



March 28th, 2024

## 1.2 Introduction

This report reflects the activity of the Customer's Ombudsman between January and December 2023 and complies with the duty to provide information set out in Article 22 of the Customer's Ombudsman Regulation.

**It also aims to meet three main objectives:**

1. Sharing the activities developed between January and December 2023 (Part I)
2. Analysing customer dissatisfactions as well as performance evaluation by claimants (Part II)
3. Presenting proposals for improving the relationship between E-REDES and its customers (Part III)

**Part I deals with the following topics:**

- Ombudsman's Mission
- Information System - SWOP Platform
- Taxonomy of the Claims
- Main Statistics

**Part II includes:**

- E-REDES customer dissatisfaction management and expectations
- Evaluation of the Ombudsman's performance by claimants

**Part III meets:**

- Recommendations
- This report also includes an Executive Summary and main statistics.

## 2. Main Indicators

In 2023, as in previous years, the Internet (electronic form via the Ombudsman's website), – the communication channel of choice in the interaction of claimants with the Customer Ombudsman – continued to be universally accepted by users who contacted the Customer Ombudsman, as no claims were received from them requesting other communication channels, a conclusion that is certainly relevant to the evolution of the E-REDES complaint management systems.

There was a 74% increase in the number of claims regarding E-REDES compared to 2022 confirming increasing problems related to the management of clients due to three factors:

- a. Lack of readings sent to the suppliers for active clients implying no consideration of the solar production. Unfortunately, quite often, even after detecting the problem, E-REDES takes long periods to correct the situation increasing the dissatisfaction of the clients;
- b. High number of unplanned interruptions causing damages and other problems to clients;
- c. Significant number of no-shows for planned visits and successive repetitions for the same client.

For the period under review, we highlight the following statistical data:

### 2.1 Claims Entry Flow

1638 claims concerning E-REDES were submitted to the Client's Ombudsman, corresponding to an average of 4,5 claims/day.

Of the 1638 claims submitted, 90,5% were one-off claims, with the remaining 9,5% being repeated claims. In relation to 2022, there is a slight increase in the percentage of unique claims by about 0,6 percentage points.

Of the total number of claims answered, 224 (14%) had no record of any previous complaint, information request or operation request in the internal services of E-REDES. When compared to 2022, there is an increase of almost 3 percentage points. In this sense, a slight shift in the customer behaviour, initially choosing the support of the Ombudsman to resolve their issue.

16% of the claims were submitted by customers residing in service quality zone A, 32% of the claims were made by customers in service quality zone B and 53% relative to service quality zone C, which represents a decrease of 3 percentage points of claims in service quality zones A compared to 2022 (19%), the number of claims in service quality zone B remained the same (32%) and the number of claims in service quality zone C increased 4 percentage points (49%).

Most claims received are from private customers (87%), a value that has suffered a slight increase in relation to 2022 (86%).

Of the total number of claims submitted in 2023, around 29% concerned issues of non-resolution, 60% corresponded to issues of transfer of responsibility and 12% to issues of lack of information.

## 2.2 Website Visits

Following the change in the image of the EDP group companies, the Customer Ombudsman website was also disaggregated for the E-REDES, SU Eletricidade and EDP Comercial companies. The data presented below refers to E-REDES during the period of 26/06/2023 to 31/12/2023.

Page views totalled 34.964, corresponding to an average of 1,99 page views per visit.

15.501 are from unique visitors, corresponding to an average of 42 unique visitors/day.

833 of the unique visitors (5,4% of the total) were from outside Portugal, the most common countries being Spain, France, the United States, and China.

The site's FAQ page reached 1.566 visits corresponding to 4,5% of sessions which visited it.

## 2.3 Taxonomy of Claims

In 2023, the following taxonomy continued to be used for claims submitted to the Customer Ombudsman:

### CONTRACTS



- Pre-contractual information
- Data updates
- Other changes

### SUPPLY



- Installation/connection or reconnection
- Interruptions
- Voltage/load
- Outage
- Losses associated with the energy supply

### READINGS



- Meter reading/operating
- Invoice Components
- Estimates
- Billing Periods
- Sending/receiving invoices
- Payment
- Fractioning

### WORKS AND OTHER INTERVENTIONS



- Disrespect of other people's property (trespassing etc.)
- Damage to property (felling trees, etc.)
- Works in public spaces

### NETWORKS AND PUBLIC LIGHTING



- Lighting
- Deficiencies/malfunctions not corrected in time
- Planning/safety
- Environment

### CUSTOMER SERVICE



- Contradictions and delays in clarifications and answers
- Lack of response
- Behaviour
- No intervention (or poor intervention) at the scheduled date/time
- Campaigns offer

The “Supply” factor continued to be responsible for most of the claims, increasing 3 percentual points when compared with the previous year.

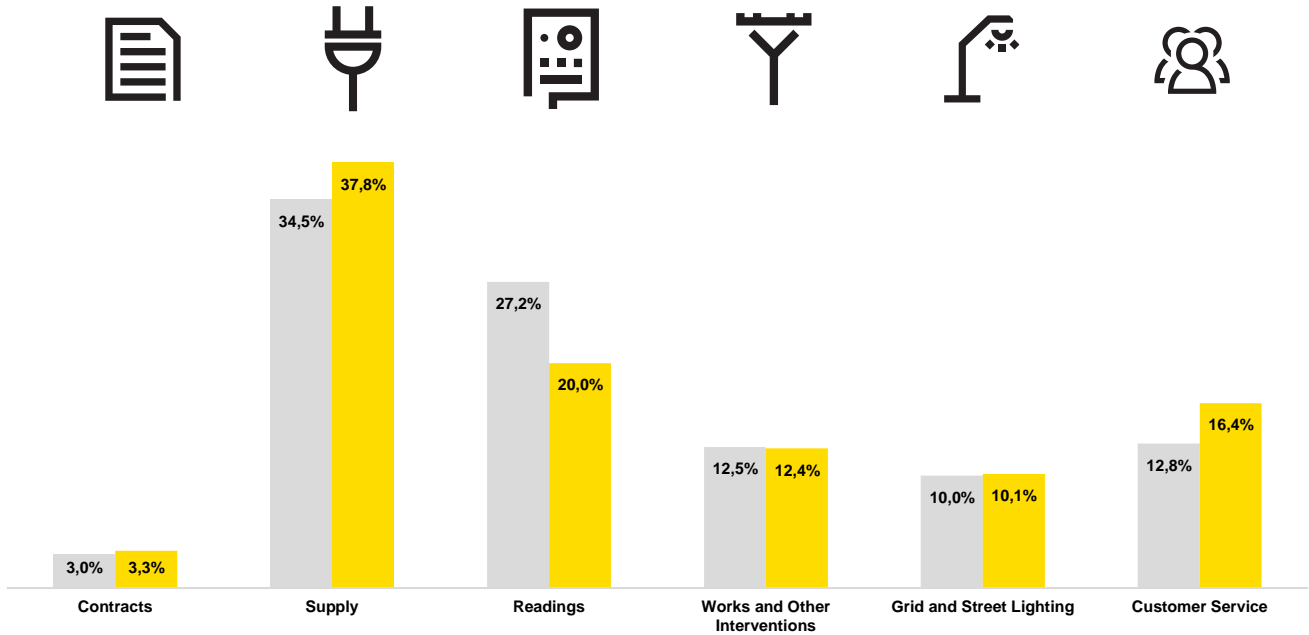
The second most common taxonomic reason for claims was “Readings”, although there was a decrease of 7 percentual points relative to 2022, leaving “Customer Service” as the third factor, where there was a 3 percentual point increase relative to the previous year.

The factors “Contracts” and “Grid and Street Lighting” suffered a residual increase, as it went from 3,0% in 2022 to 3,3% in 2023 and from 10,0% in 2022 to 10,1% in 2023, respectively.

Compared to the previous year, “Works and Other Interventions” causes had a decrease from 12,5% to 12,4%.

### TAXONOMY OF THE FIELD CLAIM

■ 2022 ■ 2023



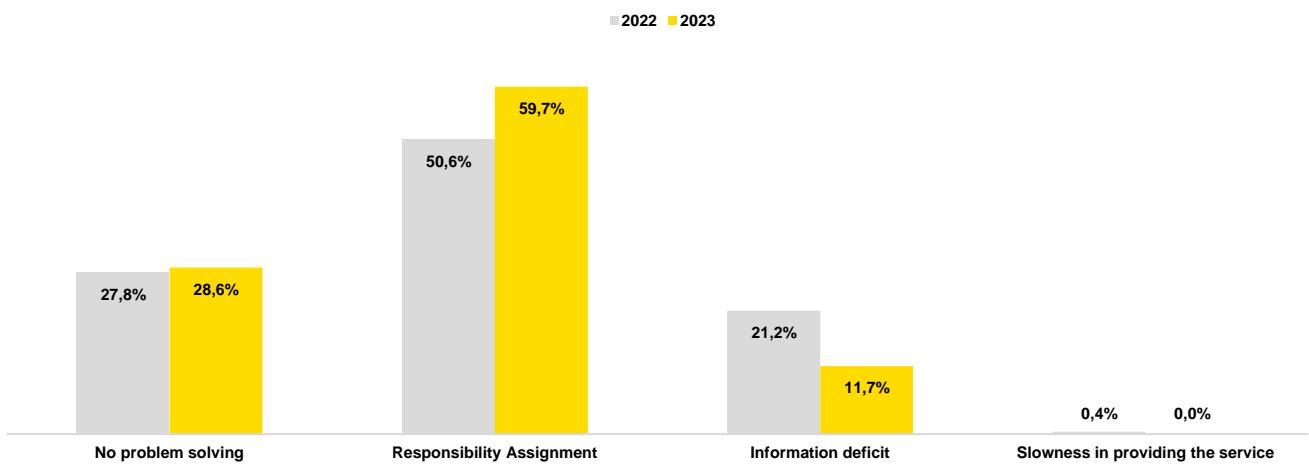
## 2.4 Distribution of Causes of Claims

59,7% of the cases dealt with by the Ombudsman, had as origin of the claim, the transfer of responsibility of the problem initially presented to E-REDES.

About 28,6% of the cases presented to the Ombudsman in 2023 corresponded to claims where the initial resolution of the problem did not occur.

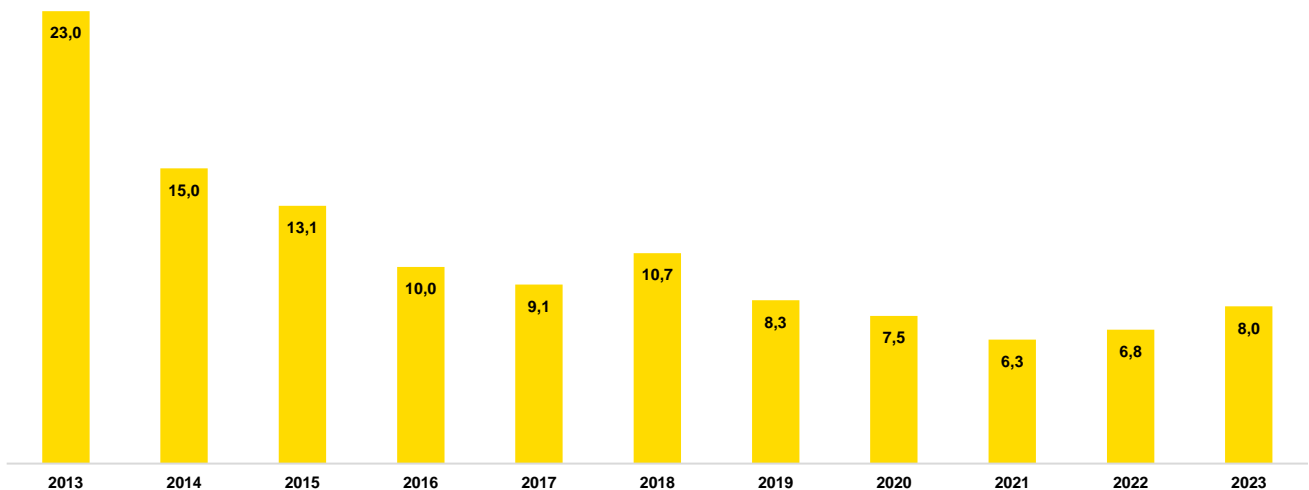
The third largest cause of claims was due to lack of information (11,7%).

The cause “Slowness in Providing the Service” represents the cases where customers believe that E-REDES did not meet the deadlines presented and decreased to zero in 2023.



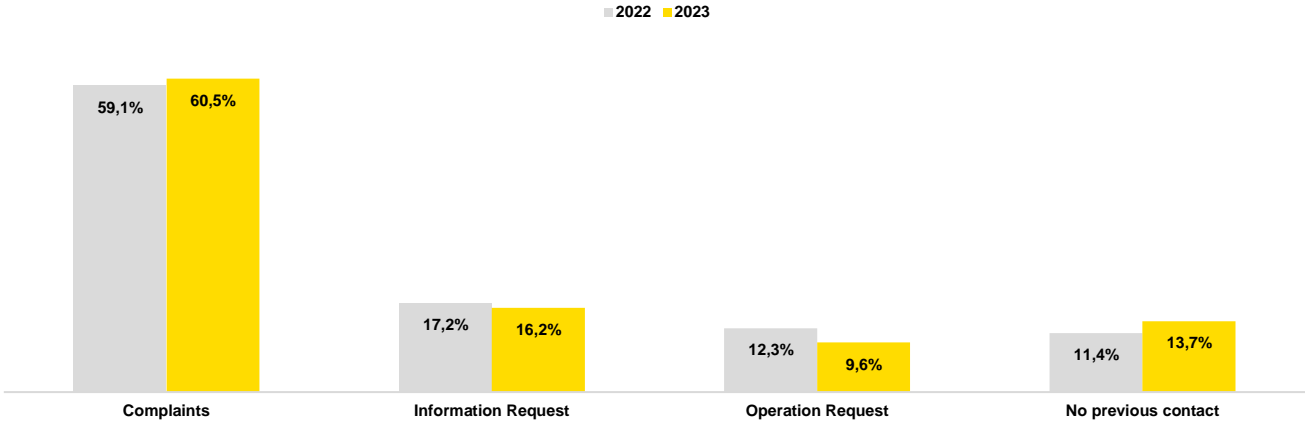
The Ombudsman’s average response time was 8,0 working days, which results in a slight increase (19%) compared to the average response time recorded in 2022 (6,8 days). This slight increase is due to the increase of the number of claims registered during 2023.

OMBUDSMAN'S RESPONSE TIME TO SUBMITTED CLAIMS (DAYS)



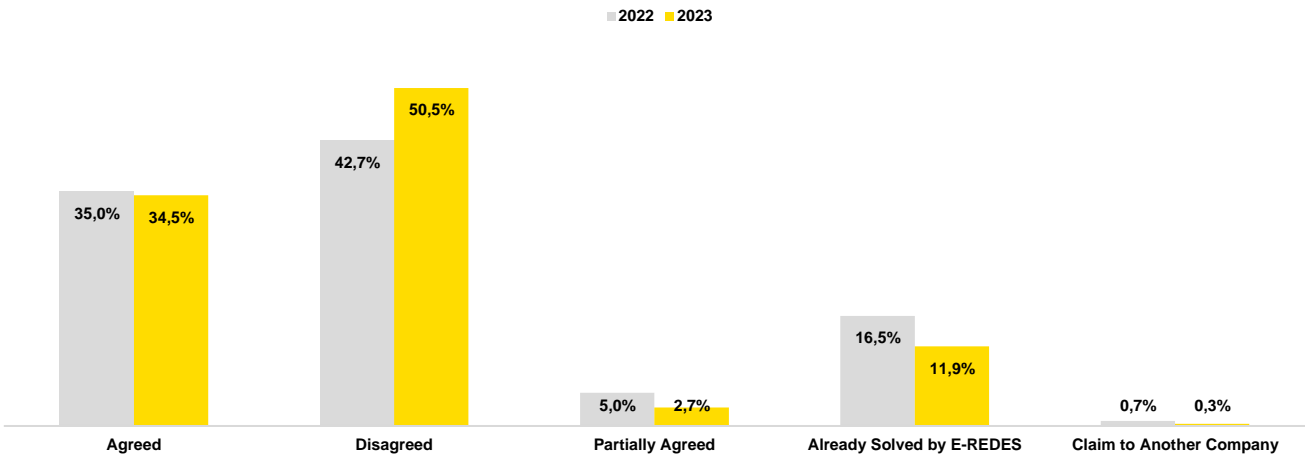
## 2.5 Claims Filed Without a Previous Complaint

This graph shows the type of contact that did or did not exist prior to the filing of the claim, verifying that the percentage of claims preceded by a complaint increased from 59,1% to 60,5%, but there are still 14% of cases in which the claim was not preceded by a complaint, so that, according to the regulation in force, there would be no duty to issue a decision on such claims.



## 2.6 Ombudsman's Decisions Related to the Client Claims

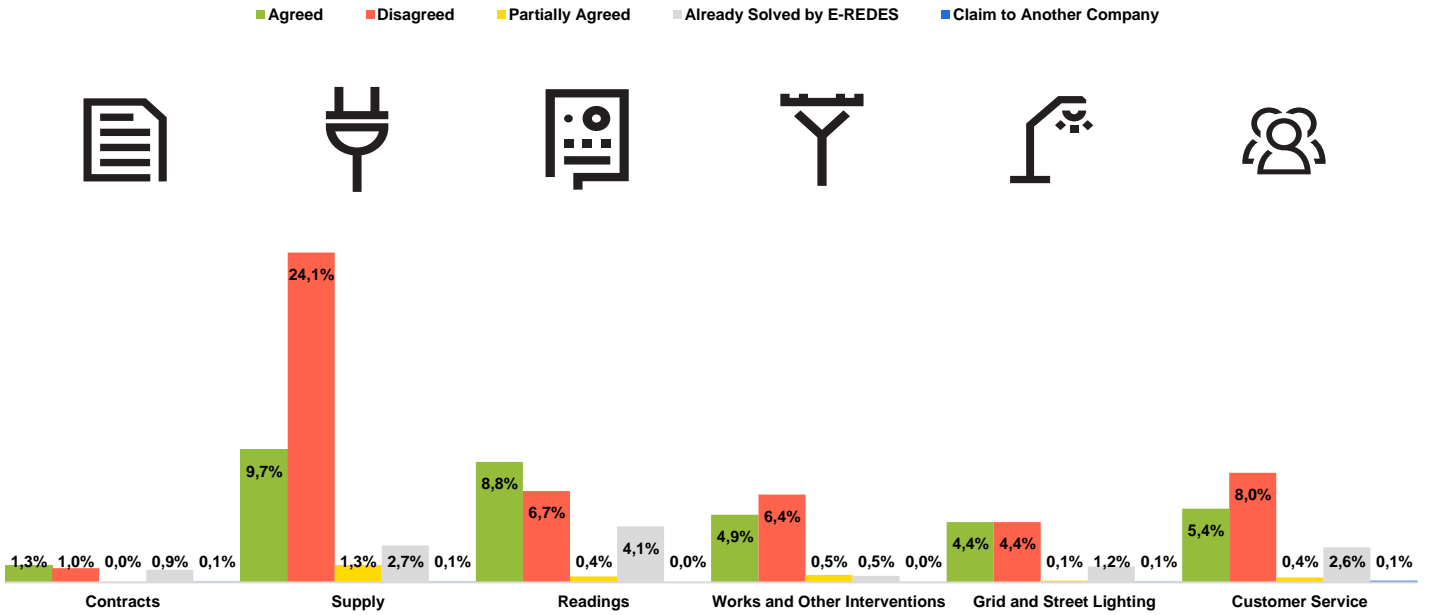
In 2023, the classifications of the Ombudsman decisions related to the client claims compared to 2022 show a significant increase of disagreement (from 42,7% in 2022 to 50,5% in 2023) and a minor reduction of issues already solved (from 16,5% in 2022 to 11,9% in 2023).



## 2.7 Ombudsman’s Response Type by Taxonomic Classification

Most of the Ombudsman's decisions are related to Supply issues, and it is particularly relevant to note that around 11,0% of the cases merited total or partial agreement against 24,1% disagreement.

The “Supply”, “Readings” and “Customer Service” classes represent 74% of the total claims submitted to the Ombudsman.



## 3. Customer Ombudsman

### 3.1 Mission

The figure of the Customer Ombudsman, an external and independent entity to EDP, was created in 2008, and the Regulation of the Customer Ombudsman of EDP Group Companies were approved on March 25 of that year. On March 1, 2009, Prof. Luís Valadares Tavares assumed the role of Customer Ombudsman and based on the regulation and his vision of the role, he commits to the following mission:

“Assuming that in the uncertain world in which we live trust is a valuable asset, it is my mission, as an independent entity, to contribute to strengthening trust in the relationships between EDP Group companies and their customers. My decision will be based on objective principles and guided by criteria of fairness, also considering the guiding frameworks adopted in the European Union!”

In 2021, the activities of the Customer Ombudsman were separated by company and his mission is now devoted to cope with the management of the clients of E-REDES.

To carry out this mission, the following activities were identified as core:

### 3.2 Main Activities

- Receive and assess claims submitted by customers, directly related to acts or omissions by E-REDES.
- To establish a dialogue with the claimant customer.
- To mediate existing disputes and conflicts between customers and E-REDES.
- To issue decisions on matters related with the activity of E-REDES, if requested by any of their corporate bodies.
- To propose the adoption of measures that contribute to improving the quality of service and customer satisfaction levels.
- Establishing contacts with external interlocutors seeking to obtain information and specialized knowledge that will enable the recommendation to E-REDES for the adoption of measures of improvement in their customer relationship.

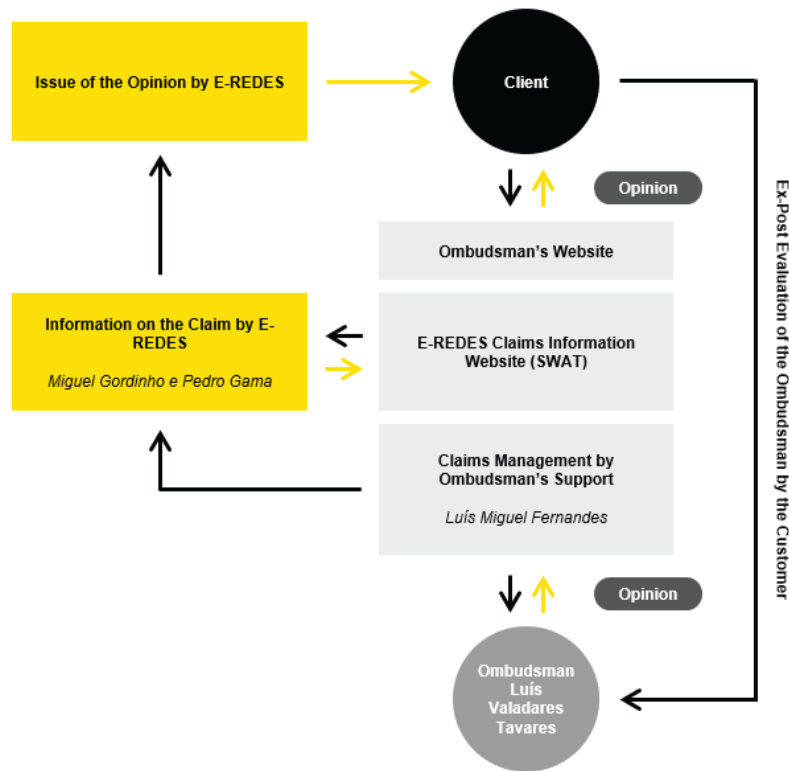
### 3.3 New Regulatory Framework

In line with the regulator's guidelines, in 2021 it was possible to separate the Ombudsman's activities for each EDP group company, namely E-REDES, EDP Comercial, SU Electricity and SU Gas. It should be noted that this separation is total regarding the information system, reception, treatment, and response to customer claims, and also total with regard to the teams that support the Ombudsman and prepare the information necessary for the Ombudsman to issue each decision.

In 2023, this team included specialists Miguel Gordinho, Pedro Samuel Gama and Luís Miguel Fernandes.

The operating organization chart is shown below:

#### COMPLAINT MANAGEMENT MODEL BY THE E-REDES CUSTOMER OMBUDSMAN



### 3.4 SWOP Information System

The website of the Customer Ombudsman is the communication channel of choice for the presentation of claims. Most Portuguese people now have Internet access and are familiar with using this communication channel.

The management and processing of claims submitted through the site to the Client's Ombudsman is ensured by a system specifically designed for this purpose, called SWOP - Smart Web Ombudsman Platform.

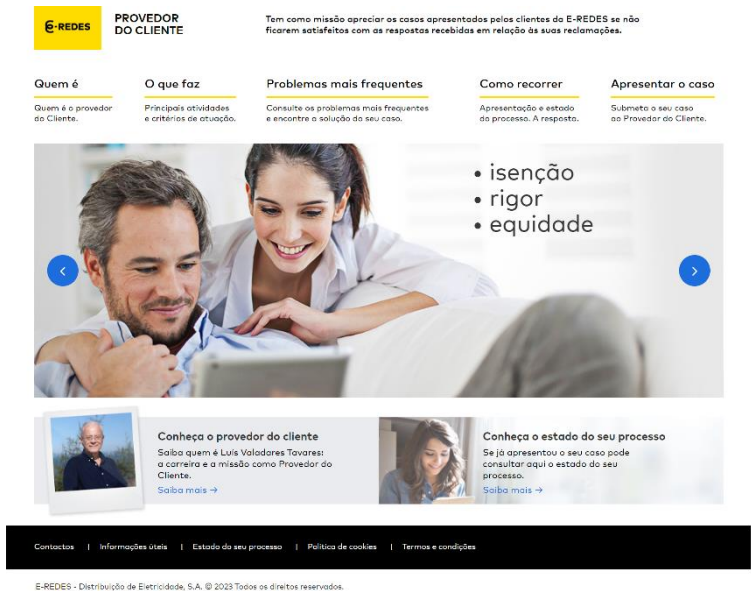
#### The SWOP platform allows:

- A centralized communication with customer through a single channel - the Ombudsman's website, available at [provedordocliente.e-redes.pt](http://provedordocliente.e-redes.pt).
- A single format for the submitted claims - there is an electronic form for sending claims.
- The systemization of the claim submission process.
- A database record of all the submitted claims and the creation of a unique key (internal stamp) for each claim in the database.
- Automatic registration of key-data of claims (e.g., submission date)
- The decrease in number of the ineligible claims received.
- A prompter response to received claims.

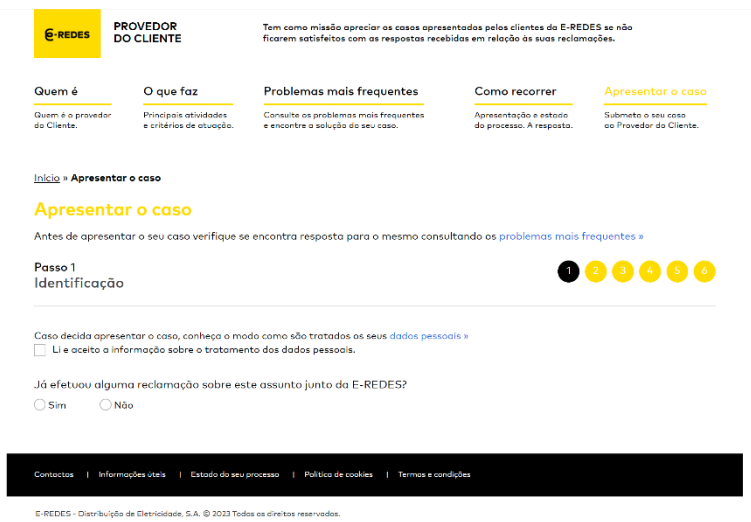
#### SWOP Components:

- Ombudsman's website (Frontend).
- Electronic form for sending claims.
- Database where site claims are registered.
- Unique key (internal stamp) to identify claims.
- Backoffice of the Ombudsman's website.
- Workflow for the processes of analysis, treatment, and response to claims.
- Typology for classifying claims

The Ombudsman's site is available at [provedordocliente.e-redes.pt](http://provedordocliente.e-redes.pt), as shown in the following image:



The electronic claim form, the main feature of the Customer Ombudsman website, has the following graphic appearance:



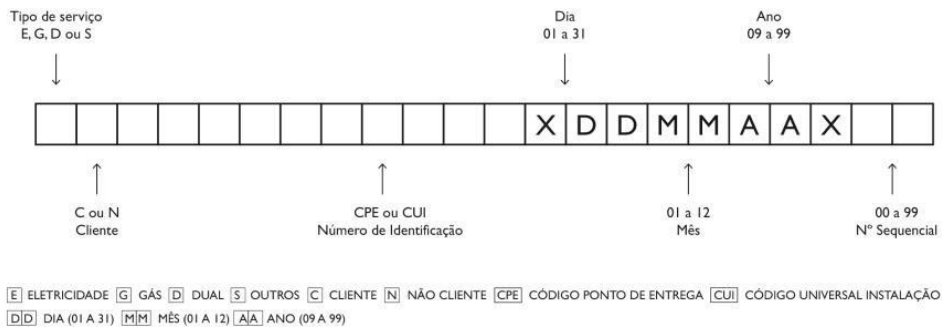
Being a responsive site allowing easy and intuitive access on various mobile devices:



The SWOP is associated with a Database where all the identifying and descriptive elements of the claimant and its claim are registered. The main features and advantages of this form are:

- Standardization of the claim format.
- Systematization of the claim submission process.
- Filing of claims in a central Data Base.
- Association of a unique key to each claim.
- Automatic registration of the date of submission of the claim.
- Automatic pre-verification of the eligibility of claims.

The unique key, which we have called the "internal stamp", unambiguously and quickly identifies claims. The format of the internal stamp is as follows:



## 4. Key Statistics 2023

In this chapter, we graphically present key statistics regarding access to the website, submission of claims, response to claims, and execution of decisions, for the period June 26 to December 31, 2023.

### 4.1 Website Access

#### A1. Visitor Overview

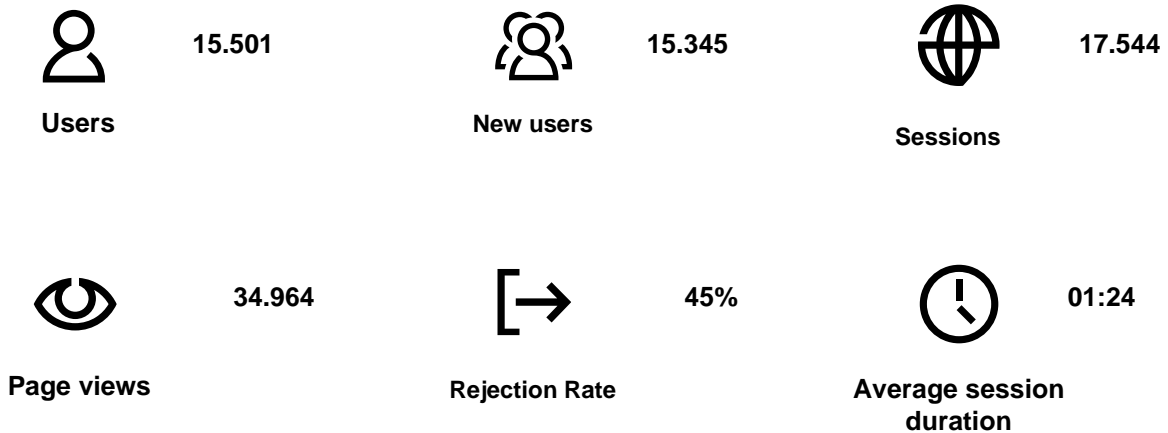
The available statistics concern the period June 26 to December 31, 2023 because the previous months of 2023 were filled up by the implementation activities of the new website devoted to E-REDES.

During this period, the Ombudsman's website was visited by 15.501 people (unique visitors), representing an average of 42 unique visitors/day.

Page views totalled 34.964 corresponding to an average of 2,0 page views per visit.

The average time spent on the site per visitor was 1 minute and 24 seconds.

During the period under analysis, the Ombudsman's site registered a rejection rate of 45%, which means that a little less than half the visitors left the site through the site's entry page, i.e., they did not navigate through the Ombudsman's site.

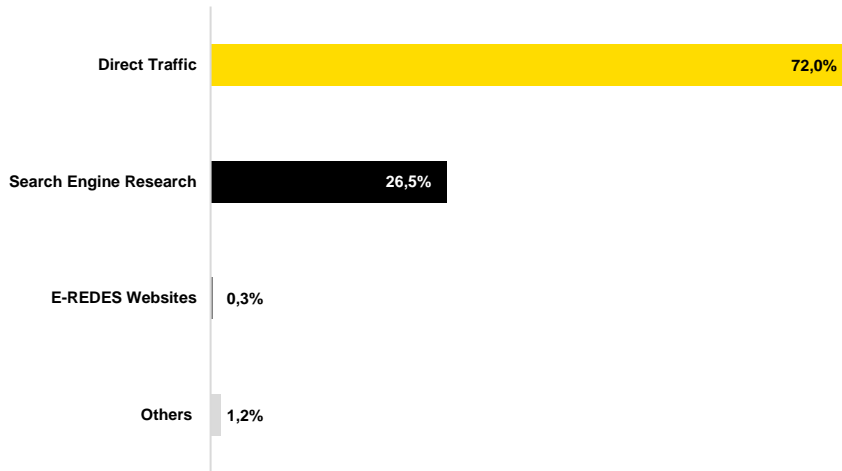


## A2. Overview of Traffic Sources

Of the total visits received, 0,3% came from E-REDES websites.

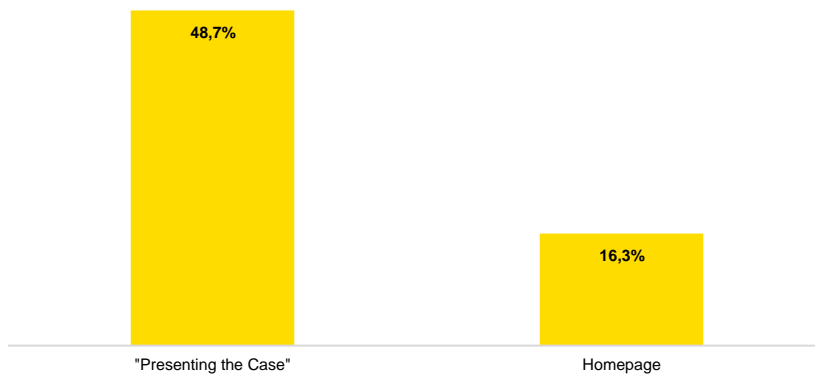
A little more than a quarter of the traffic was directed from searches on search engines, 26,5%.

Direct traffic visits, i.e., insertion of the Ombudsman’s website link directly into the browser’s address bar, accounted for 72,0%.



## A3. Content Overview

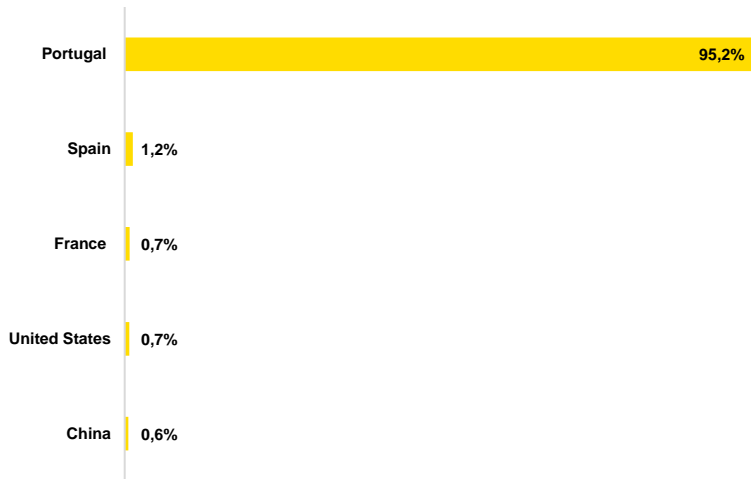
The most visited page continued to be the "Presenting the case" page, with a total percentage of 48,7% of total page views, followed by the homepage with 16,3%.



#### A4. Coverage Overview

Between June and December 2023, the Ombudsman's website received visits from 32 different countries/territories. Naturally, Portugal was the origin of most visits with 95,2% of the traffic.

The remaining visits came from countries such as Spain, France, the United States of America, China, Switzerland, Germany, Ireland, the Netherlands, and the United Kingdom, among others, which is probably associated with the effect of emigration.



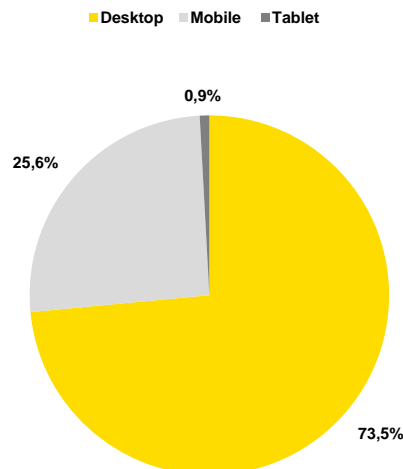
#### A5. Access by Device

The access to the Ombudsman's website on computers was 73,5%, it was the most used type of device.

The second most used device was mobile with 25,6%.

It is expected that a tendency for the weight of mobiles over other devices to increase will continue over the next few years.

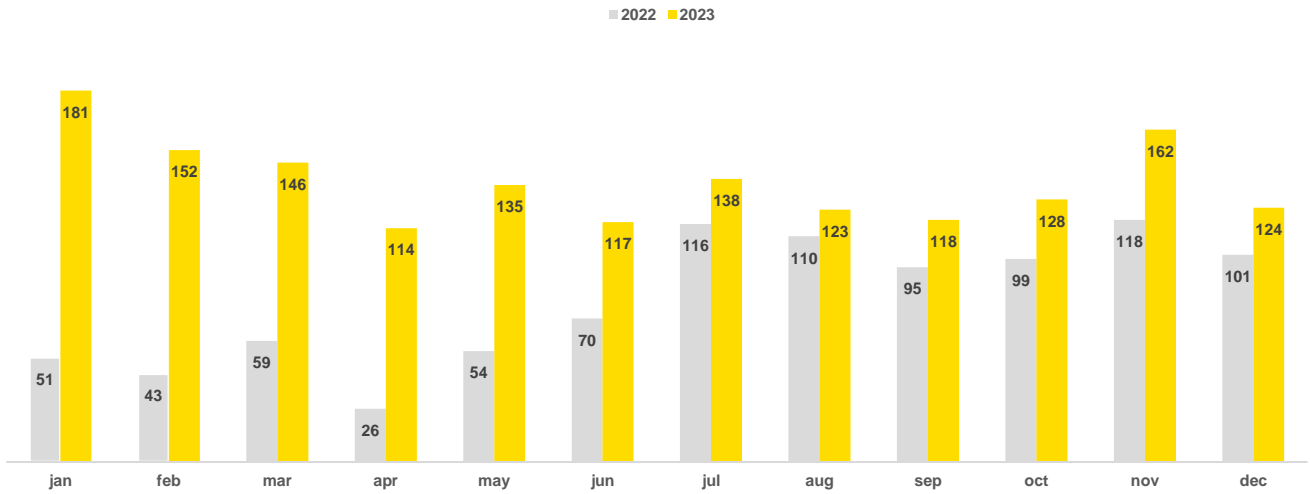
These statistics can be compared with those of 2022: Desktop 55%, Mobile 43%, Tablet 2%.



## 4.2 Filing of Claims

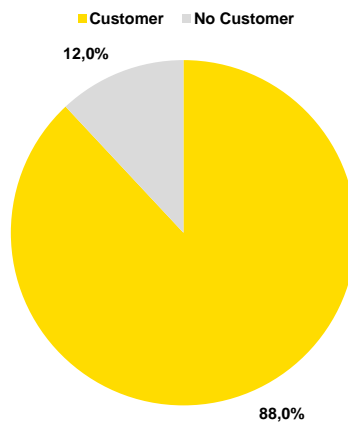
### B1. Per Month

In 2023, 1638 claims concerning E-REDES were submitted to the Customer Ombudsman, 696 more than in 2022, representing an increase of 74%. This increase was already explained before.



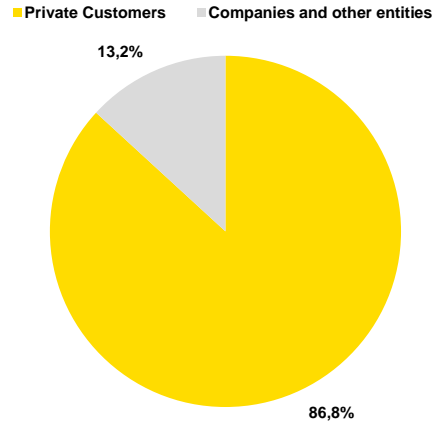
### B2. Per Type of Relationship With the Supplier

88% of the claimants who submitted claims to the Ombudsman have an active electricity contract.



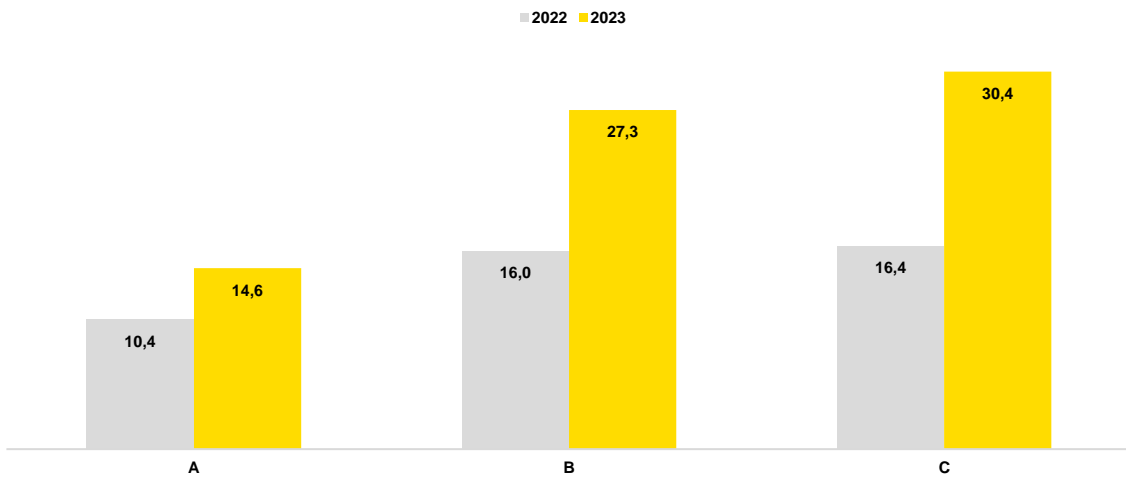
### B3. Per Type of Customer

Claims submitted by private customers accounted for 86,8% of the claims submitted to the Ombudsman in 2023.



### B4. Per E-REDES Service Areas (per 100,000 contracts)

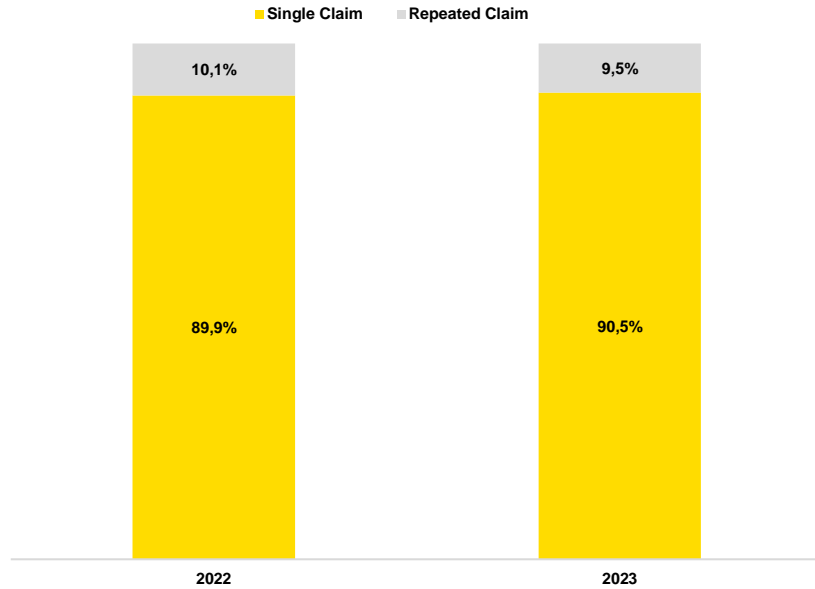
Analysing the number of claims per 100,000 contracts, we have more asymmetrical results: the B/A ratio increased from 1,5 in 2022 to 1,9 in 2023 and the C/A ratio increased from 1,6 in 2022 to 2,1 in 2023.



### 4.3 Response to Claims

#### C1. Single Claims

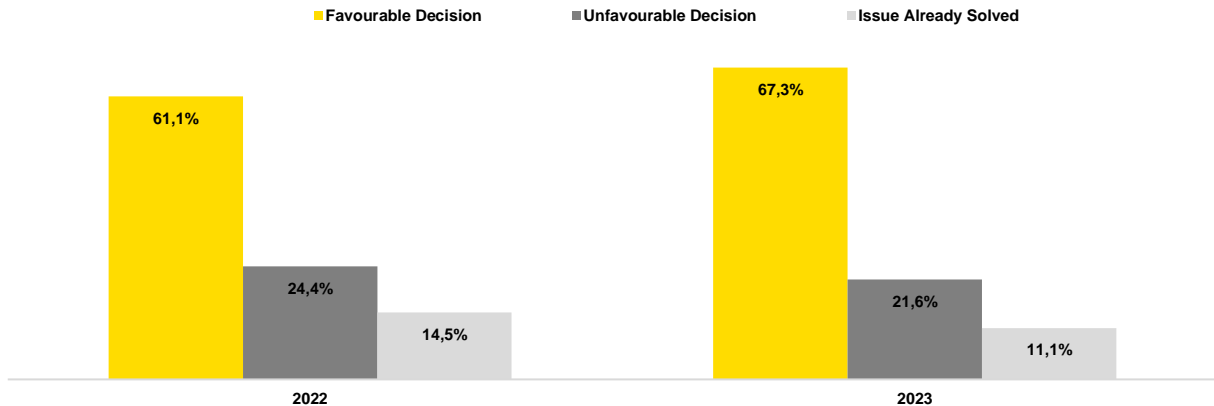
Of the 1638 claims submitted, 1255 were one-off claims (90,5%), with the remaining 132 being repeat claims. In relation to 2022, there is an increase in the percentage of unique claims of about 0,6 pp.



#### C2. Relationship Between the Orientation of the Ombudsman's Decisions and Previous E-REDES Responses to the Customer Complaints

About 67,3% of claims received concurring decisions from the previous E-REDES response to the customer complaints, a higher figure than the one presented in 2022 (61,1%).

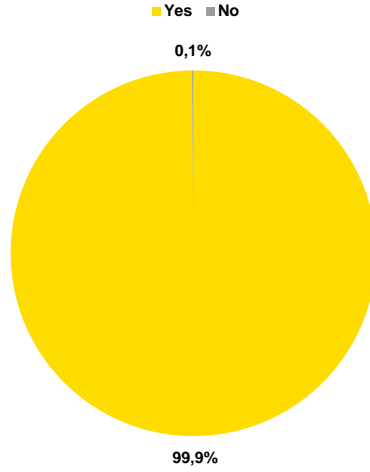
The percentage of claims in agreement with the first response of E-REDES has increased.



## 4.4 Execution of the Decisions

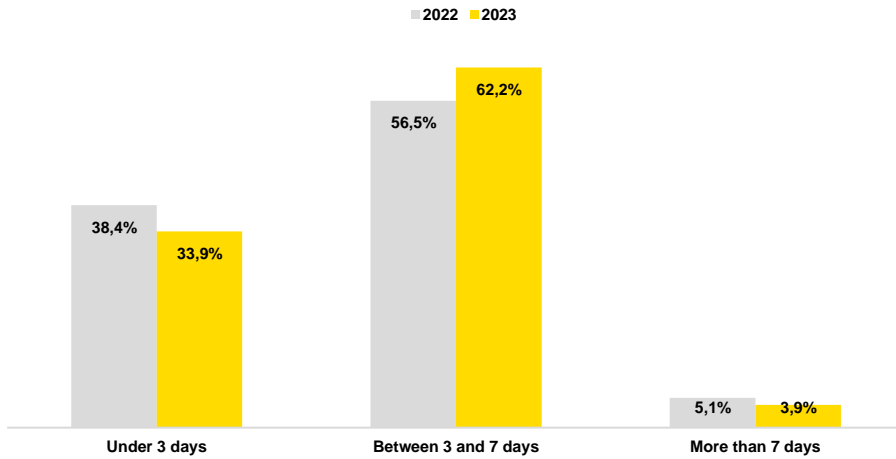
### D1. Decisions Followed by E-REDES

99,9% of the decisions issued in 2023 were executed favourably.



### D2. Time of Execution of the Decisions

The average execution time for decisions in 2023 was about 3,8 days, a decrease from 2022, where the average time had been 5,1 days.



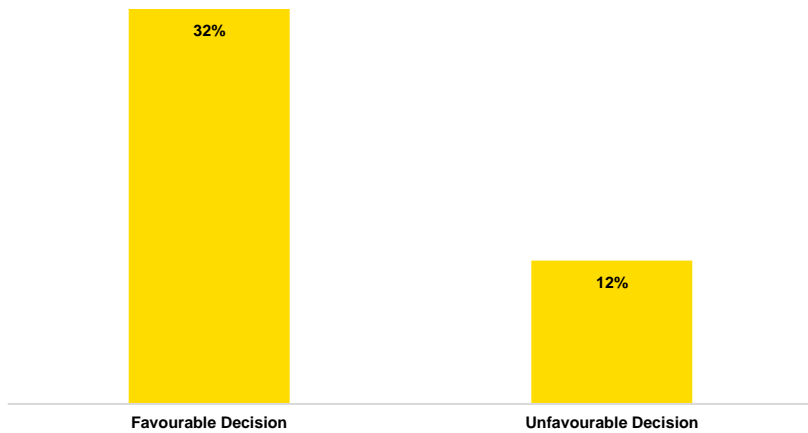
## 5. Level of Satisfaction of the Clients About the Ombudsman Contribution in Terms of the Process Executed by E-REDES

The evaluation of the Customer Ombudsman is carried out anonymously by all customers who have submitted a claim, 15 days after the claim was made. The response rate remains significantly high (34%).

### A. Level of Satisfaction of the Client by the Ombudsman Contribution for Problem Solving

The level of satisfaction of the client by the Ombudsman depends on the client perception of the decision communicated:

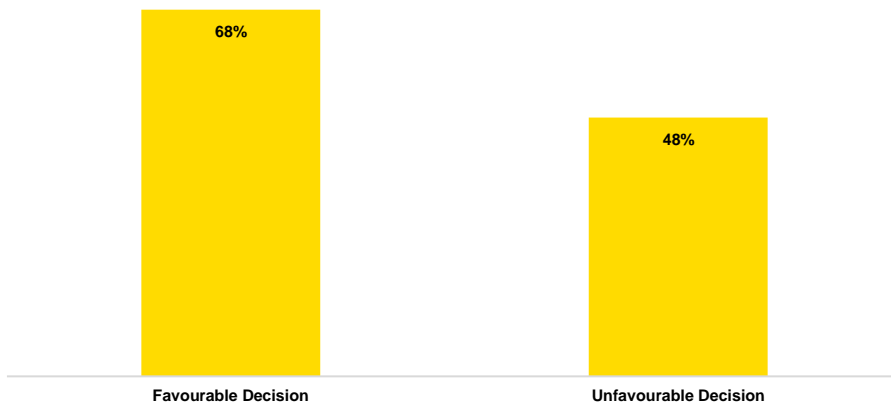
- The level of satisfaction when the perception corresponds to a favourable decision is 32%.
- The level of satisfaction when the perception corresponds to an unfavourable decision is 12%.



### B. Accessibility of the Claim Submission

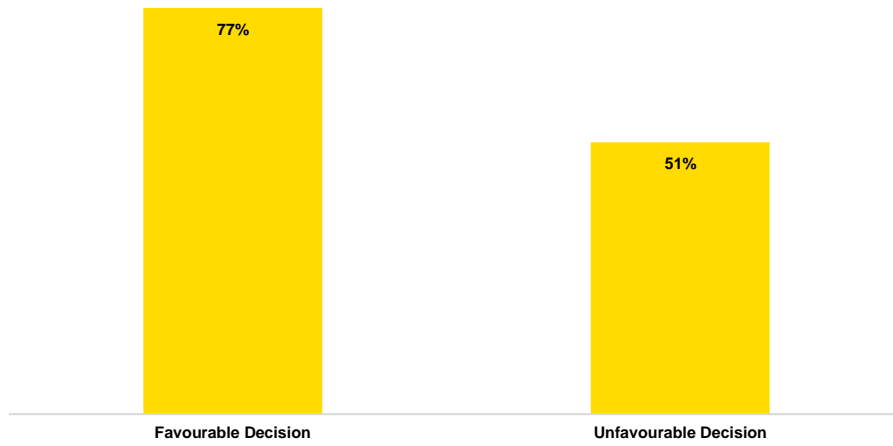
The level of satisfaction regarding this criterion is different for the population of clients perceiving a favourable decision (68%) and for clients perceiving an unfavourable decision (48%).

Level of Satisfaction of the client by the Ease Of Lodging a Claim



### C. Ombudsman Response Time

The percentage of satisfaction with response time also differs for the population of clients perceiving a favourable decision (77%) and for clients perceiving an unfavourable decision (51%).



## 6. Satisfaction Barometer

The Barometer to be developed is based on a multiple criteria structure in order to cover the most relevant dimensions for the formation of the state of customer satisfaction, namely regarding pre-decision customer clarifications, contracting and acquisition of the desired product, after-sales service and, finally, management of claims and complaints.

To construct these value functions, the LIKERT model was used, which consists of adopting a scale from 1 (worst value) to 7 (best value) for the value function, V, which will then have to be applied to each descriptor. Qualitatively, one could say that 1 corresponds to the worst possible (terrible), 2 " bad, 3 " mediocre, 4 " sufficient, 5 " good, 6 " very good, 7 " the best possible (great).

According to the satisfaction barometer data, E-REDES has been maintaining its performance over the last quarters of 2023.



## 7. Strategic Recommendations and Final Considerations

During 2023 the legal misunderstandings pointed out by the Ombudsman in a special report (January 2023) were overcome, namely about the concept of force majeure and of lapsed consumptions.

Unfortunately, during 2023 the wave of complaints concerning three major causes has been increasing:

1. Lack of quality control of the service providers changing meters with a few cases including more than 5 no-shows and irritating clients;
2. Not sending on-time readings for active consumers;
3. More frequent interruptions of supply and reports by clients of several damages.

The management of claims has been improving and hopefully 2024 will be a less litigious year.

The digital channel could have a more effective use by clients and E-REDES should stop accepting complaints by phone. This change would help clients to find a more convenient channel for their needs, would save E-REDES budget and, finally, might increase the clients' satisfaction.

Also, a more rapid system to correct the lack of information sent about consumption for solar clients should be implemented and better information system to monitor the quality of field services are quite important to avoid successive no-shows.

## 8. Annexes

### 8.1 Glossary

#### VISITS

Number of individual sessions initiated by all visitors on the Site.

#### VISITORS

The total number of unique visitors to the Site in a given time period.

#### PAGE VIEWS

Number of times a given page has been viewed.

#### LANDING PAGE

First page displayed during a visit.

#### BOUNCE RATE

Number of visitors who left the site after displaying the landing page.

#### DIRECT TRAFFIC

Visit via direct link (type in address in browser or via bookmarks).

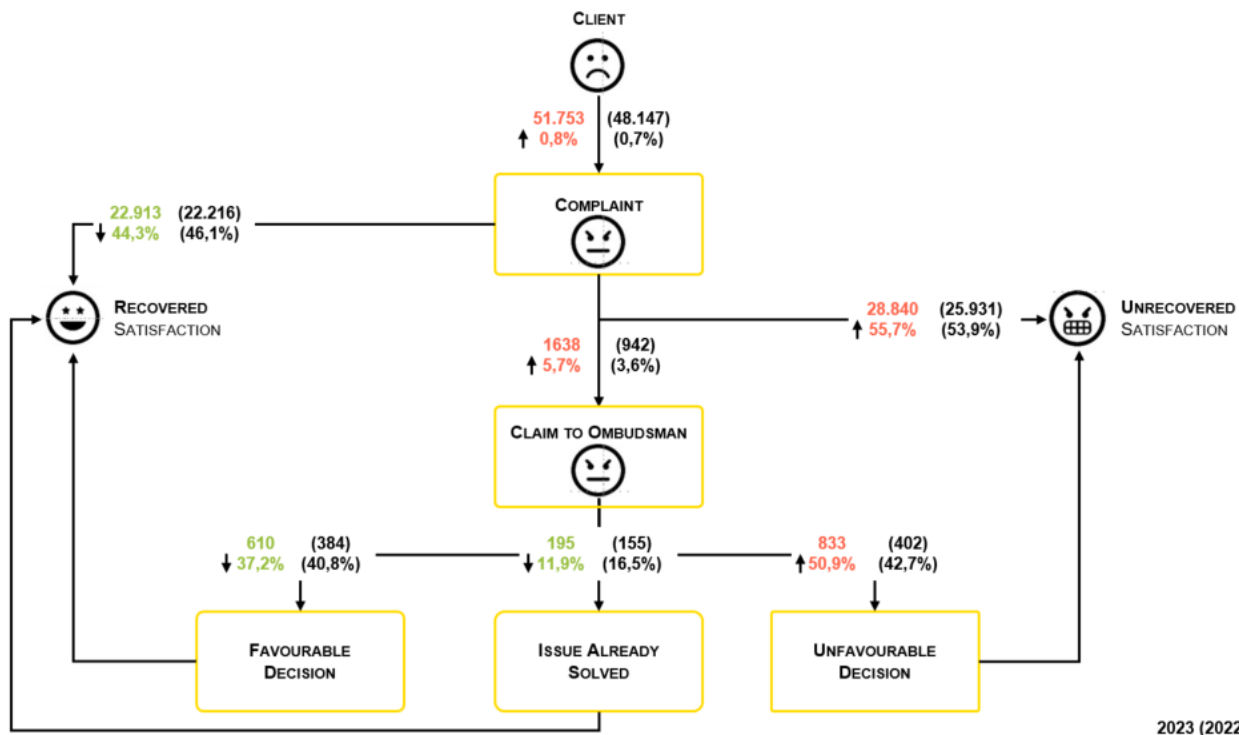
#### REFERRAL TRAFFIC

Visitation via another site that has a link to your site.

#### ORGANIC TRAFFIC

Organic searches (not paid) made in search engines (eg Google, Bing, etc.).

## 8.2 Dissatisfaction Roadmap



## 8.3 Regulation of the Customer Ombudsman of the EDP Group companies

Approved at a meeting of the Executive Board of Directors of EDP - Energias de Portugal, S.A. (EDP) on December 9, 2014.

### Chapter I

#### General Provisions

##### Article 1

#### Functions

The Customer Ombudsman of the EDP Group companies, hereinafter referred to as the hereinafter referred to as the Customer Ombudsman, has as its principal function the defence and promotion of the rights and guarantees of the customers of the Group companies, within the scope of the exercise of their respective activities.

##### Article 2

#### Principles of operation

In its actions, the Customer Ombudsman shall be governed by principles of independence and fairness, promoting dialogue between the EDP Group companies and their customers, contributing to relations between the parties based on good faith and mutual trust.

### CHAPTER II

#### Scope of application

##### Article 3

#### Subjective Scope

The Client's Ombudsman is competent to assess all issues that are submitted to it by any natural or legal person with legitimacy to do so the exercise of the activities of the EDP Group companies and their relations with their customers.

##### Article 4

#### Objective Scope

The Customer Ombudsman shall pronounce on all matters referred to it related with the provision of services and the supply of energy by the companies of the by EDP Group companies to their customers, specifically with regard to compliance with supply contracts supply contracts, consumption estimates, invoicing and requests for compensation for damages that result directly from the service provided.

### Chapter III

#### Statute and competences of the Client's Ombudsman

##### Article 5

#### Appointment and term of office

1. The Customer Ombudsman is appointed by EDP's Executive Board of Directors, and the choice shall fall upon a person of recognised prestige, suitability, professional reputation, integrity and independence.
2. The Customer Ombudsman shall exercise his or her functions for a period of 3 (three) years. The respective mandate may be renewed twice for the same period.

3. After the end of the mandate, the Client's Ombudsman shall remain in office until his or her successor is appointed.

4. The contractual relationship between EDP and the Customer Ombudsman is not of a labour nature.

#### Article 6

##### Termination of office

The Customer Ombudsman may cease functions in the following situations:

- a) End of term of office.
- b) Resignation presented to the Executive Board of Directors of EDP.
- c) Supervening incapacity.
- d) Deliberation of the Executive Board of Directors of EDP, in the event of confirmed negligent conduct on the part of the Customer Ombudsman, within the scope of the exercise of the functions attributed to him.

#### Article 7

##### Incompatibilities

Upon appointment and during his duties, the Customer Ombudsman may not:

- a) Hold any management, direction, advisory or consultancy position in any companies competing with EDP Group companies or in companies that are in a controlling or group relationship with companies competing with EDP Group companies.
- b) Being bound in any way to other entities, namely clients, competitors, suppliers, or service providers of the companies of the EDP Group, provided that such connection may give rise to situations of conflict of interest.

#### Article 8

##### Impediments

The Customer Ombudsman may not assess or take decisions concerning matters to which he is a party, either by himself or as a representative of another person, or when he has any personal interest therein.

#### Article 9

##### Powers

The Client's Ombudsman shall be responsible:

- a) To receive and appraise claims submitted by customers, directly related with acts or omissions of the companies of the EDP Group;
- b) To establish a dialogue with the claimant Customer;
- c) To mediate existing disputes and conflicts between customers and EDP Group companies;
- d) To issue opinions on matters relating to the activity of the EDP Group companies, provided that requested by any of their corporate bodies.
- e) To propose the adoption of measures that contribute to improve the quality of service and customer satisfaction index.
- f) Establishing external contacts seeking to obtain information and specialized knowledge that will enable EDP Group companies the adoption of customer relationship improvement measures.

## Article 10

### Diligences

Within the scope of the exercise of his functions, the Client's Ombudsman is empowered to carry out the following measures:

- a) Make and promote contacts with the EDP Group companies, requesting the information and the documents it deems appropriate.
  - b) To formulate recommendations with a view to the correction of discriminatory, illegal or irregular practices that violate the rights and guarantees of the EDP Group companies' customers, or the quality or efficiency of the supply or service provided by them.
2. The Customer Ombudsman shall have as direct interlocutors the persons that EDP indicate for the purpose.
3. Without prejudice to the provisions of the previous number, and if it informs in advance the Interlocutor designated by EDP, the Customer Ombudsman may establish direct contacts with companies of the EDP Group that it deems necessary for the provision of indispensable necessary for the provision of indispensable clarifications on the matter under consideration.

## Chapter IV

### Procedure

#### Article 11

### Organization

In exercising its functions, the Client's Ombudsman has its own organic structure called the Client's Ombudsman's Office structure, which is defined by EDP's Executive Board of Directors, on the proposal of the Customer Ombudsman.

#### Article 12

### Submission of claims

1. The intervention of the Customer Ombudsman occurs only after the obtainment, by the customer, of an unfavourable response to the claim, issued by the services of the EDP Group companies.
2. Under the provisions of the previous number, the Customer Ombudsman shall forward to the competent services of the companies of the EDP Group all claims not yet presented directly to those services.
3. The Customer Ombudsman is also competent to assess claims that, formulated directly to the competent services of the EDP Group companies, are not responded to within a maximum period of one (1) month from the respective receipt.

#### Article 13

### Form, deadline, and requirements for the presentation of claims

1. The claim must be addressed, in writing, to the Customer Ombudsman and must have a complete identification and residence of the claimant Customer, as well as a description of the reasons that support it, and must also be accompanied by all relevant documentation for the respective assessment.
2. The claim may also be presented by any entity in representation of the Customer provided that, in the written communication, in addition documentation mentioned in paragraph 1 of this article, is attached proof of legitimacy of the of the entity in question to represent the Customer.
3. Claims submitted shall be numbered sequentially in accordance with the respective date of entry.
4. The claim must be filed within a maximum period of 6 (six) months from the date receipt of an unfavourable decision by EDP or the expiration of the deadline referred to in number 3 of the previous article.

## Article 14

### Preliminary assessment

1. Claims shall be subject to preliminary assessment by the Customer Ombudsman or any of the members of his Office, and those that reveal bad faith or are unfounded will be rejected.
2. The Customer Ombudsman may ask Customers for clarification and/or additional documentation on the facts described or the alleged reasons.

## Article 15

### Instruction

In the instruction of the process, the following principles must be observed:

- a) Celerity - the Customer Ombudsman shall have twenty (20) working days from the date of receipt of the complaint to present to EDP the proposed recommendation.
- b) Cooperation - within the scope of the steps to be taken by the Customer Ombudsman to the facts, the interlocutor appointed by EDP will provide all the necessary for the complete clarification of the situation, namely by providing information and delivering the documentation requested, to this end, promoting, with the companies of the EDP Group, the necessary contacts to obtain the elements leading to the resolution of the issues in the question concerned.

## Article 16

### Archiving

Claims that present the following characteristics are filed:

- a) Which do not fall within the competence of the Customer's Ombudsman.
- b) Which omit essential elements and do not allow for the formulation of a recommendation.
  - a) Which are not within the competence of the Customer's Ombudsman.
  - c) Which concern issues that have been resolved in the meantime.

## Article 17

### Recommendations

1. Once the instruction of the process is complete, the Customer Ombudsman formulates its recommendation and communicates it to EDP.
2. EDP, within an average period of 10 (ten) days, informs the Customer Ombudsman of its position on the proposed recommendation and, in the event of disagreement, must give reasons to its decision.
3. The Customer Ombudsman's recommendations accepted by EDP shall be considered binding.

## Article 18

### Response to the Customer

The response to the Customer shall be sent by the Office of the Customer Ombudsman within five (5) days from the date of receipt of EDP's decision regarding the recommendation formulated.

## Article 19

## Appeal to Courts

Recourse by the claimant Customer to the out-of-court procedure provided for under present Regulation shall not deprive him/her of the right to appeal to the courts competent to settle the dispute.

## Capítulo V

### Direitos, Deveres e Obrigações

#### Article 20

#### EDP's Obligations

In order to enable the Customer Ombudsman to carry out his activities, EDP undertakes to:

- a) Allocate to the Customer Ombudsman an annual budgetary allocation.
- b) To provide the Customer Ombudsman with the means and conditions that make it possible to obtaining the necessary information and documentation.

#### Article 21

#### Duties of the Ombudsman

1. The Customer Ombudsman shall present to EDP Group companies all the recommendations and proposals that it considers useful for the protection of customers' rights and guarantees and that contribute to the improvement of the EDP Group companies' relations with their customers.
2. The Client's Ombudsman shall keep confidential all the facts that come to his knowledge during the exercise of his functions, to the extent that the nature of the facts requires it.

#### Article 22

#### Provision of Information

1. Every quarter, the Customer Ombudsman shall present to the interlocutor appointed by EDP a summary of the activities carried out in the previous quarter, as well as any proposals deemed appropriate to improve the performance of his duties.
2. The Customer Ombudsman shall present an annual report to the Executive Board of Directors of EDP on the activity carried out by him, which makes it possible to evaluate the results obtained and identify the nature of the disputes submitted to him, with a view to their subsequent publication.

## Chapter VI

### Final Provisions

#### Article 23

#### Entry into Force

These Regulation shall come into force on the working day following approval by the Executive Board of Directors of EDP.

#### Article 24

#### Publicity

EDP will publish these Regulation on its Internet page ([www.edp.pt](http://www.edp.pt)) and on its Intranet for the information of its customers and employees.



Customer Ombudsman  
**Annual Report 2023**

