

# Comprehensive ESG Performance and Strategic Disclosure Analysis of Korea Electric Power Corporation (2014–2023)

## Institutional Identity and Corporate Foundation

The Korea Electric Power Corporation, known formally and legally as Korea Electric Power Corporation and universally recognized by the acronym KEPCO (and locally as Hanjeon), represents the primary artery of the South Korean energy infrastructure.<sup>1</sup> Established under the specific mandate of the Korea Electric Power Corporation Act, the entity operates as a public state-owned enterprise (SOE), a designation that fundamentally intertwines its corporate governance with the national economic and security policies of the Republic of Korea.<sup>1</sup> The company is headquartered in Naju, South Jeolla Province, a location that signifies the broader South Korean policy of regional decentralization and balanced national development.<sup>1</sup>

Within the global financial and industrial ecosystem, KEPCO is classified under the Electric Utilities sector, with its primary business activities encompassing the entire value chain of the electricity industry: generation, transmission, and distribution.<sup>1</sup> As the dominant player in the domestic market, KEPCO is responsible for approximately 96% of the nation's electricity generation as of the 2023 fiscal year.<sup>1</sup> This near-monopolistic position is maintained through six wholly-owned power generation subsidiaries, including Korea Hydro & Nuclear Power (KHNP) and five thermal power companies (Korea South-East Power, Korea Midland Power, Korea Western Power, Korea Southern Power, and Korea East-West Power).<sup>1</sup>

The identification of KEPCO as the subject of this analysis is verified through multiple primary and secondary financial repositories. The company is listed on the Korea Exchange under the ticker symbol 015760.KS and maintains a significant international presence through its listing on the New York Stock Exchange under the ticker symbol KEP.<sup>1</sup> Verification of these details is corroborated by exchange-level data from the Korea Exchange (KRX) and the New York Stock Exchange (NYSE), as well as comprehensive profiles provided by Reuters, Bloomberg, and Investing.com.<sup>1</sup> The ownership structure as of 2024–2025 further confirms its SOE status, with the South Korean government directly holding 18.2% and indirectly holding 32.9% through the Korea Development Bank, a 100% government-owned entity, resulting in a combined state interest of 51.10%.<sup>1</sup>

## Core Operational Statistics and Infrastructure

Component	Metric/Detail	Source
Legal Entity Name	Korea Electric Power Corporation (KEPCO)	1
Ticker Symbol	015760.KS (KRX) / KEP (NYSE)	1
Industry Classification	Utilities / Electric Utilities & IPPs	4
Headquarters	55 Jeollyeok-ro, Naju-si, Jeollanam-do, South Korea	3
Total Installed Capacity	83,235 MW (as of December 31, 2023)	1
Transmission Lines	35,596 circuit kilometers	1
Primary Shareholders	Korean Government & Korea Development Bank (51.1%)	1
Generating Units	794 units across nuclear, coal, LNG, and renewables	1

The operational scale of KEPCO is vast, involving the management of 794 generation units as of the end of 2023, which utilize a diverse energy mix comprising nuclear, oil, coal, liquefied natural gas (LNG), hydro, wind, and solar sources.<sup>1</sup> This immense infrastructure serves industrial, commercial, residential, educational, and agricultural customers throughout South Korea.<sup>1</sup> The complexity of managing such a diverse portfolio within a strictly regulated environment means that KEPCO’s ESG disclosures are not merely a report on corporate ethics but a critical reflection of national energy security and the country’s transition toward a decarbonized economy.

## ESG Reporting Timeline and Disclosure Evolution (2014–2023)

The reporting landscape for KEPCO between 2014 and 2023 underwent a transformative shift, moving from the traditional paradigms of Corporate Social Responsibility (CSR) to the

integrated, risk-based frameworks of Environmental, Social, and Governance (ESG) reporting. This evolution was driven by both internal strategic shifts and external pressures from the global investment community and domestic regulatory bodies.

## **The Foundation Period and Reporting Standardization (2014–2016)**

In 2014, KEPCO's sustainability reporting was primarily a voluntary exercise intended to demonstrate transparency to its stakeholders. The company had been publishing annual sustainability reports since 2005, making it a relatively early adopter of such disclosures in the South Korean context.<sup>5</sup> During the 2014–2015 period, the company utilized the Global Reporting Initiative (GRI) G4 guidelines as its primary reporting framework.<sup>7</sup> This era was marked by an emphasis on the "social" aspects of the utility, particularly in terms of stabilizing electricity prices and providing universal access to power.

However, this period also coincided with significant governance challenges. In October 2013, the indictment of a KEPCO vice-president and approximately 100 others for falsifying safety documents related to nuclear power plant components cast a long shadow over the company's 2014 disclosures.<sup>1</sup> Consequently, the reports during this time were heavily focused on restoring public trust and detailing the implementation of new, more rigorous quality control and safety assurance mechanisms within the nuclear business.<sup>1</sup>

By 2016, KEPCO began to more explicitly align its sustainability reporting with the United Nations Sustainable Development Goals (SDGs). The company participated in the 2016 sustainability reporting cycle by detailing its contributions to goal 7 (Affordable and Clean Energy) and goal 13 (Climate Action).<sup>8</sup> This period also saw the first significant international sustainability milestones for KEPCO's joint ventures, such as the Emirates Nuclear Energy Corporation (ENEC) 2016 Sustainability Report, which detailed KEPCO's role as the prime contractor for the Barakah nuclear power plant.<sup>9</sup>

## **Strategic Integration and the Green Finance Era (2017–2019)**

The year 2017 marked a pivotal shift in the depth of KEPCO's disclosures. The company transitioned its reporting to the GRI Standards (Core Option), providing a more granular look at its environmental impact and material ESG risks.<sup>5</sup> A critical development in 2017 was KEPCO's inclusion in the "Getting Electricity" category of the World Bank's *Doing Business* report, where it ranked among the top performers globally for its efficiency and transparency in utility connection.<sup>5</sup>

In 2018, KEPCO integrated the International Integrated Reporting Council (IIRC) framework into its annual disclosures.<sup>5</sup> This move was designed to better articulate the relationship between the company's "six capitals" (financial, manufactured, intellectual, human, social/relationship, and natural) and its long-term value creation strategy. The 2018 report also began to address the "energy transition" and "digital transformation" as the two core pillars of its future

sustainability, reflecting the broader South Korean government's "Renewable Energy 3020" plan.<sup>5</sup>

The year 2019 was defined by KEPCO's entry into the green finance market. In June 2019, the company issued its inaugural Green Bond, raising USD 500 million from international markets.<sup>8</sup> This issuance was supported by a Green Bond Framework that was subjected to an independent second-party opinion from Sustainalytics, which verified that the proceeds would be used for renewable energy projects and clean transportation infrastructure, such as electric vehicle (EV) charging networks.<sup>5</sup> This milestone represented a significant increase in KEPCO's ESG transparency, as the company committed to annual impact reporting on greenhouse gas (GHG) emissions avoided through the funded projects.<sup>8</sup>

## **Crisis Management and Framework Sophistication (2020–2021)**

While 2019 was a year of success, 2020 brought significant ESG controversy. Major institutional investors, including BlackRock, UBS Asset Management, and the Church of England, publicly challenged KEPCO's plans to invest in overseas coal-fired power plants in Vietnam (Vung Ang 2) and Indonesia (Jawa 9 & 10).<sup>10</sup> These investors argued that continued investment in coal was incompatible with KEPCO's green ambitions and posed substantial stranded asset risks. This period highlighted a "management gap" in KEPCO's ESG profile, as analyzed by the Institute for Energy Economics and Financial Analysis (IEEFA), which suggested that seasoned ESG investors were beginning to view KEPCO's green claims with skepticism.<sup>10</sup>

In response to these pressures, KEPCO further sophisticated its disclosure frameworks in 2021. The company adopted the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) and began reporting industry-specific metrics according to the Sustainability Accounting Standards Board (SASB) standards.<sup>12</sup> The 2021 reporting cycle also saw the formal declaration of the "Zero Carbon Vision 2050," aligning KEPCO's corporate strategy with the South Korean government's national carbon neutrality target.<sup>14</sup>

## **Financial Volatility and ESG Resilience (2022–2023)**

The years 2022 and 2023 were arguably the most difficult in KEPCO's modern history from a financial perspective, which directly impacted its ESG disclosures. The global surge in fuel prices following the Russia-Ukraine war led to a record operating loss of approximately KRW 32.6 trillion (USD 25 billion) in 2022.<sup>15</sup> The company's ESG reports during this period were forced to balance the urgent need for financial restructuring with the long-term commitments of the energy transition.

Despite these headwinds, KEPCO maintained its reporting rigor. The company obtained a "B" rating from the Carbon Disclosure Project (CDP) for Climate Change in 2023, which is considered a "Management level" rating indicating that the company understands its main risks and impacts and is taking action to reduce them.<sup>13</sup> Third-party assurance for these reports was

consistently provided by the Korean Management Registrar (KMR), which verified the reliability of the sustainability data in accordance with AA1000AS standards.<sup>5</sup>

Year	Key ESG Development / Milestone	Disclosure Framework / Agency	Source
2014	Post-nuclear scandal transparency reforms	GRI G4 Guidelines	1
2016	Alignment with UN Sustainable Development Goals	GRI G4 / UN SDGs	8
2017	Ranked globally for utility efficiency (World Bank)	GRI Standards (Core)	5
2018	Adoption of Integrated Reporting framework	IIRC / GRI Standards	5
2019	Issuance of first USD 500M Green Bond	Sustainalytics (SPO)	5
2020	Controversy over Vung Ang 2 and Jawa 9 & 10 coal projects	IEEFA / Major Shareholders	10
2021	Declaration of "Zero Carbon Vision 2050"	TCFD / SASB / GRI	13

2022	Record KRW 32.6 trillion operating loss reported	TCFD / K-IFRS	15
2023	Obtained "B" Rating in CDP Climate Change 2023	CDP / KMR Assurance	2

## Governance Structure and State Ownership Dynamics

The governance of KEPCO is uniquely defined by its status as a government-related entity. This relationship provides a double-edged sword for its ESG profile: while it ensures the highest levels of creditworthiness, it also subjects corporate decision-making to the political and social priorities of the state, which may at times conflict with purely environmental or financial goals.

### The Mechanism of State Control

The South Korean government exercises control over KEPCO through a 51.10% stake, split between direct ownership and the state-owned Korea Development Bank.<sup>1</sup> This majority ownership means that KEPCO's Board of Directors is often composed of government appointees or individuals with close ties to the Ministry of Trade, Industry and Energy (MOTIE) and the Ministry of Economy and Finance (MOEF).<sup>17</sup> The company is designated as a "market-oriented public corporation" under the Act on the Management of Public Institutions, which subjects it to annual management evaluations by the government.<sup>2</sup>

This structural reality has profound implications for KEPCO's "G" (Governance) score. On one hand, the company maintains a highly stable and professional management structure. On the other hand, it has historically lacked the autonomy to adjust electricity tariffs independently of political considerations. For example, during the 2022 global energy crisis, the government opted to freeze or limit tariff increases to combat inflation, a decision that contributed to KEPCO's massive financial losses.<sup>18</sup> From an ESG perspective, this demonstrates a prioritization of the "Social" goal of price stability over the "Financial" and "Environmental" sustainability of the utility.

### Subsidiary Relations and Internal Governance Failures

A critical aspect of KEPCO's governance is its relationship with its subsidiaries, particularly Korea Hydro & Nuclear Power (KHNP). In 2025, a significant governance failure was revealed through a legal dispute between KEPCO and KHNP regarding the settlement of over KRW 1 trillion (approximately USD 720 million) in additional construction costs for the Barakah nuclear plant.<sup>19</sup> The dispute, which escalated to arbitration at the London Court of International Arbitration (LCIA), led to the leakage of core technological information and national strategic

assets to overseas law firms and private consulting companies.<sup>19</sup>

The South Korean Trade Minister described this internal conflict as an "unforgivable incident," pointing to a failure in the integrated governance of the nuclear export program.<sup>19</sup> This dispute highlights a significant "G" risk: the lack of a unified system to manage the complex, high-stakes relationships between the parent utility and its massive subsidiaries. This fragmentation can lead to substantial financial losses and the compromise of sensitive technology, directly impacting the company's ESG performance ratings.

## **Environmental Sustainability: The Coal and Nuclear Nexus**

As South Korea's largest greenhouse gas emitter, KEPCO's environmental performance is the primary focus of its sustainability strategy. The company's energy mix is a complex amalgam of legacy coal assets, a revitalized nuclear program, and a nascent but growing renewable energy portfolio.

### **The Coal Reliance and Climate Litigation**

As of December 2023, KEPCO possessed an installed coal power capacity of 27,327 MW, representing roughly 39% of its total generation.<sup>11</sup> KEPCO and its subsidiaries were responsible for approximately 27% of South Korea's cumulative greenhouse gas emissions between 2011 and 2022.<sup>20</sup> This heavy reliance on fossil fuels has made KEPCO a primary target for climate-related activism and legal challenges.

In August 2025, a landmark civil claim was filed by a group of Korean farmers against KEPCO and its five thermal power subsidiaries.<sup>20</sup> The plaintiffs allege that KEPCO's continued reliance on coal and its investments in fossil fuel infrastructure have directly contributed to abnormal climate events, resulting in severe agricultural damage and psychological distress.<sup>20</sup> The lawsuit relies on the "polluter-pays principle" and cites scientific methodologies—including a 2014 paper by Richard Heede and more recent Nature publications—to quantify KEPCO's specific contribution to global warming.<sup>21</sup>

This lawsuit signifies the emergence of "Climate Liability" as a material ESG risk for KEPCO. According to reports from Solutions for Our Climate (SFOC), heatwave-related damages in South Korea between 2011 and 2023 reached an estimated USD 119.6 billion, with KEPCO's subsidiaries attributed with a substantial portion of the responsibility based on their emissions profiles.<sup>20</sup>

### **Nuclear Energy as a Decarbonization Tool**

In contrast to its coal portfolio, KEPCO's nuclear business is promoted as a critical solution to the climate crisis. The Barakah nuclear power plant in the UAE, consisting of four APR-1400



reactors, is the crowning achievement of KEPCO's overseas nuclear business.<sup>23</sup> The plant prevents the release of an estimated 22.4 million tons of carbon emissions annually, contributing significantly to the UAE's "Net Zero 2050" initiative.<sup>24</sup>

However, the nuclear program itself is subject to rigorous ESG evaluation. Beyond the technical safety of the reactors, which is overseen by the independent Federal Authority for Nuclear Regulation (FANR) and the International Atomic Energy Agency (IAEA), the "S" and "G" aspects of nuclear power are highly scrutinized.<sup>24</sup> This includes radioactive waste management, local community engagement, and the prevention of human rights violations in the global supply chain for nuclear fuel.<sup>9</sup> In recent years, KEPCO has also begun exploring advanced nuclear technologies, signing an MOU with Daewoo Shipbuilding & Marine Engineering to develop floating nuclear power plants based on small modular reactor (SMR) technology.<sup>1</sup>

## **Renewable Energy and the RE100 Challenge**

The transition to renewable energy is KEPCO's most challenging environmental goal. While the company aims for carbon neutrality by 2050, its current share of renewable investment has been criticized as being below the world average for major utilities.<sup>18</sup> The influence of the RE100 initiative—a global corporate commitment to 100% renewable energy—is growing in South Korea, with 36 domestic companies currently participating.<sup>18</sup> This puts KEPCO under pressure to provide a reliable and competitive supply of green electricity to its industrial customers, who face increasing demands from global supply chains to reduce their Scope 2 emissions.

KEPCO's strategy involves expanding its offshore wind and solar capacity, as well as developing green hydrogen infrastructure.<sup>1</sup> The company's 2019 green bond issuance was a critical step in financing these initiatives, focusing on new and renewable energy and eco-friendly projects.<sup>5</sup> However, the slow pace of domestic renewable energy permitting and grid integration remains a structural bottleneck for KEPCO's environmental performance targets.

## **Social Responsibility: Safety, Labor, and Community**

KEPCO's social impact is measured through its internal labor practices, the safety of its operations, and its relationship with the communities in which it operates.

### **Occupational Health and Safety**

As a utility operating massive industrial facilities, occupational health and safety (OHS) is a top-tier material ESG issue for KEPCO. The company's 2023 sustainability disclosures highlight a "culture of safety" built upon the KEPCO Group Code of Conduct for Safety.<sup>12</sup> This commitment is particularly vital for subsidiaries like KEPCO KPS, which specializes in power plant maintenance and engineering.<sup>25</sup> In recent evaluations, subsidiaries like Korea East-West Power (EWP) have achieved notable safety milestones, maintaining a zero accident fatality rate



for seven consecutive years as of 2023.<sup>27</sup>

## **Community Relations and the "Energy Valley"**

A cornerstone of KEPCO's social strategy is the "Energy Valley" project in Naju. By relocating its headquarters to this region, KEPCO initiated a plan to attract over 500 energy-related companies to the area, creating a regional economic ecosystem.<sup>5</sup> As of 2019, the company had signed investment agreements with 36 companies in this valley, fostering local job creation and innovation in energy technology.<sup>5</sup>

Furthermore, KEPCO engages in extensive social contribution activities, such as the "EWP1004 Energy Project," which supports eco-friendly power facilities for local communities and vulnerable groups.<sup>27</sup> The company also maintains a certified status as a "Company for Sharing" and a "Certified Institution for Community Contribution" through its subsidiaries.<sup>26</sup>

## **Ratings, Assessments, and Financial Health**

KEPCO's ESG performance is reflected in the scores and assessments provided by international rating agencies. These ratings are increasingly utilized by institutional investors to determine the risk profile of the company's debt and equity.

### **ESG Risk Ratings and Controversy Analysis**

As of early 2026, Sustainalytics assigned KEPCO an ESG Risk Rating of 33.33, placing it in the "High Risk" category.<sup>28</sup> This rating reflects a high degree of unmanaged ESG risk, driven by the company's significant exposure to carbon-related regulations and its history of governance controversies.<sup>28</sup> Sustainalytics evaluates over 1,300 data points to arrive at this score, categorizing risks into five levels (negligible, low, medium, high, and severe).<sup>28</sup>

The "High Risk" designation is particularly influenced by "Management Gaps" and "Highest Controversy Levels," which Sustainalytics currently rates at a level 1–5 scale based on incidents in business ethics, employee relations, and customer impact.<sup>28</sup> For KEPCO, the continued investment in overseas coal projects and the financial instability caused by the regulated tariff structure are primary detractors from its score.

### **Credit Ratings and the "AA" Stability**

Paradoxically, while its ESG risk is high, KEPCO's credit rating remains exceptionally strong due to its state-owned status. As of 2025, S&P Global Ratings assigned KEPCO a long-term issue rating of 'AA', equalizing it with the sovereign rating of South Korea.<sup>30</sup> This rating reflects the company's "critical public role" and the high likelihood of government support in the event of financial distress.<sup>30</sup>

However, credit analysts have noted the "elevated" debt burden. The adjusted debt-to-EBITDA

ratio, which was a staggering 16.7x in 2023, is forecasted to improve to approximately 6.4x–6.8x in the 2024–2025 period.<sup>30</sup> The total consolidated debt at the end of 2024 stood at approximately KRW 205 trillion (USD 150 billion), a figure that represents a significant "G" risk for the long-term sustainability of the utility.<sup>2</sup>

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## Reference Table with Credibility Assessment

The following table provides a comprehensive overview of the sources used to compile this analysis, assessed for their credibility and relevance to KEPCO’s ESG profile.

#	Reference (APA 7th edition format)	Source Type	Credibility Score (0–10)	Justification for Score	Relevance to Query
1	Korea Electric Power Corporation. (2023). <i>2023 Sustainability Report</i> . KEPCO.	Primary Source	10	Official corporate disclosure; subjected to third-party assurance.	Fundamental for identifying reporting milestones and goals.
2	Securities and Exchange Commission. (2021). <i>Form 20-F: Korea Electric Power Corporation</i> . SEC.	Primary Source	10	Legally mandated filing for NYSE listing; high legal accountability.	Provides verified financial and regulatory risk information.
3	Sustainalytics. (2026).	Secondary Source	9	Leading global ESG	Key for assessing

	<i>KEPCO ESG Risk Rating Summary.</i> Morningstar.			rating agency with transparent methodology.	external perceptions of KEPCO's ESG risk.
4	S&P Global Ratings. (2025). <i>KEPCO Credit Rating Update.</i> S&P Global.	Secondary Source	8	Independent financial analysis from a major rating agency.	Essential for understanding the nexus between SOE status and debt.
5	IEEFA. (2020). <i>KEPCO's green bond failed the ESG market test.</i> IEEFA.	Industry/NGO	7	Expert analysis of investor sentiment; documented advocacy focus.	Documents the 2020 coal investment controversy.
6	World Nuclear Industry Status Report. (2025). <i>KEPCO Financial and Nuclear Operations Analysis.</i> WNISR.	Industry Report	7	Comprehensive independent data on global nuclear industry trends.	Provides context on the financial health of the nuclear business.
7	<i>Solutions for Our Climate.</i> (2025). South	NGO/Press Release	6	Reports on active legal proceedings; focuses on	Primary source for information on emerging

	<i>Korean Farmers sue state utility.</i> SFOC News.			environmen tal justice.	climate litigation.
8	Banktrack. (2023). <i>KEPCO Project Finance Briefing.</i> Banktrack.	NGO/Datab ase	6	Detailed tracking of financial flows to specific fossil fuel projects.	Useful for identifying specific banks and amounts in project finance.

## Transparency & Limitations

This analysis is based on data and disclosures available up to the knowledge cutoff of late 2025 and early 2026. Several critical limitations must be acknowledged:

1. **Proprietary ESG Data:** In-depth reports from agencies like MSCI, ISS ESG, and Refinitiv often require expensive corporate subscriptions. This report utilizes public summaries and news reports derived from these assessments, which may not capture daily fluctuations in scoring.
2. **State Confidentiality:** Because KEPCO is a state-owned enterprise, certain internal governance documents related to national security (particularly in the nuclear sector) or diplomatic negotiations for overseas projects are not public. Information regarding the 2025 tech leak controversy, for example, is primarily derived from parliamentary audits and press reports.<sup>19</sup>
3. **Real-Time Financial Volatility:** KEPCO's financial situation remains highly fluid. The actual debt levels for 2025 and 2026 will depend on global commodity markets and South Korean political decisions regarding electricity tariffs, which can change rapidly.
4. **Assurance Limitations:** While KEPCO's sustainability reports are verified by the Korean Management Registrar (KMR), such assurance is often limited to "moderate" or "limited" levels of certainty, rather than the "reasonable assurance" required for financial audits.<sup>5</sup>

For stakeholders seeking to independently verify this information, the following authoritative databases are recommended:

- **DART (Data Analysis, Retrieval and Transfer System):** South Korea's repository of corporate filings (managed by the Financial Supervisory Service).
- **CDP Disclosure Portal:** For detailed, self-reported data on climate change and water

management.

- **GRI Sustainability Disclosure Database:** For access to historical sustainability reports across the 2014–2023 timeline.

## Synthesis and Strategic Outlook

The strategic narrative of KEPCO from 2014 to 2023 is one of a company struggling to reconcile its legacy as a heavy carbon emitter with the existential necessity of the energy transition. The adoption of frameworks like TCFD, SASB, and GRI has provided the market with unprecedented transparency into KEPCO's operations, but that transparency has also exposed deep structural vulnerabilities.

The primary tension lies in the company's dual identity as a commercial corporation and a state instrument. The 2022 financial crisis and the 2025 climate lawsuit from domestic farmers represent two sides of the same coin: KEPCO is increasingly held accountable both for its financial stability and its environmental externalities. The successful issuance of green bonds in 2019 demonstrated that there is significant appetite for KEPCO's decarbonization efforts, yet the "market test" failure in 2020 showed that this appetite is contingent on a consistent, fossil-free strategic direction.

Looking ahead, KEPCO's ESG performance will be defined by its ability to execute the "Zero Carbon Vision 2050" amidst a mountain of debt. The pivot toward small modular reactors (SMRs) and the Energy Valley initiative suggest a path toward technological modernization. However, until the company can resolve the governance friction with its subsidiaries and definitively move away from new coal investments, its ESG Risk Rating is likely to remain in the "High" category. The integration of ESG into every layer of KEPCO's management is no longer a matter of corporate social responsibility—it is a fundamental requirement for the utility's survival in a climate-conscious global economy.

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