



Suppliers Sustainability Guide

O&M Services – Quick Guide



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About this guide



EDPR's market leadership, based in value creation capacity, innovation and relationship with its stakeholders, is much influenced by the performance of its suppliers.

EDPR bases its relationship with suppliers on trust, collaboration and creation of shared value, privileging a partnership approach focused on transparency and sustainability.

Sustainability is a central part of EDPR's mission, vision and values, not only because it is a renewable energy company but for the environmental, social and economic best practices throughout its entire value chain.

Accordingly, EDPR's procurement process is developed in the framework of the Sustainable Procurement Policy, which extends to EDPR's suppliers and service providers, both direct and indirect.

EDPR has defined procedures to ensure the several aspects that fill in with the company sustainability related policies applicable to the supply chain, namely the environment, health & safety, as well as the management and mitigation of any type of sustainability risks in the supply chain.

These policies (available on EDPR's website at www.edpr.com), with which the supplier must become familiar, are:

These policies, with which the supplier must become familiar, are:

- EDP Supplier Code of Conduct
- Occupational Health & Safety Policy
- Environmental Policy

This Suppliers Sustainability Guide provides an overview of the sustainability requirements and commitments EDPR expects its suppliers to meet. EDPR suppliers' long-term sustainable development is crucial to their success and, consequently, to EDPR's.

1. H&S AND ENVIRONMENTAL REQUIREMENTS FOR O&M SUPPLIERS

1.1. General considerations

The Contractor shall strictly comply with all legislation that may apply to the operations during the execution of the works or provision of the services included in the scope of the Contract.

The Contractor shall undertake the implementation of the necessary actions to mitigate the risks related to their activities, plan the necessary corrective and preventive actions, provide training and information about risks to its workers and the environment, as well as follow the standards, internal codes and policies, procedures and rules provided by EDPR.

The contractor must provide data on their health & safety, environmental and social performance whenever required by EDPR to demonstrate compliance with the requirements included in this guide.

EDPR has implemented an Integrated Occupational Health, Safety and Environment Management System developed and certified in accordance with the international standards ISO 45001 and ISO 14001.

The Integrated Management System is the framework that establishes procedures to ensure the proper management of health and safety and environmental risks at EDPR facilities.

The Contractor is responsible for the Health and Safety of all employees, both its own and its Subcontractors', and shall be committed to respect the environment, social and cultural assets, working in the scope of the Contract execution. Taking into account the above, the Contractor must have an adequate preventive resource (number of H&S supervisors) based on the total number of workers they have in the field. This number of H&S specialists will depend on the regulations of each country. Also, it is required the Contractor must have specialized staff in monitoring the rest of the HSE matters to ensure compliance with legal requirements and the provisions of this guide.

1.2. Health and Safety requirements at EDPR facilities in operation

A Wind Farm/PV Plant is an industrial installation. Remaining and performing work in said installation carries certain risks. An individual hazards and preventive measures document has been prepared for each Wind Farm/PV Plant, which lists out the specific dangers and the associated risks and their methods of mitigation.

Each Contractor must become familiar with the risk and emergency measures of the facilities prior to beginning of the work.

The Contractor must provide safe and healthy working conditions, including all necessary means and materials for the safe execution of all of the Contractor's tasks, such as machinery, equipment, collective protective measures (CPM), personal protective equipment (PPE), scaffolding, etc.

During the provision of the contracted services, special attention shall be paid to employees from other companies working in the same area.

Any safety-related doubts arise during the provision of the services shall be consulted immediately with the Facility Manager.

In addition to the specific rules indicated in this specification, the Contractor shall strictly comply with all applicable regulations.

The Contractor shall ensure that an adequate person with appropriate qualifications permanently supervises its employees, subcontractors and the works being performed, from the beginning until the completion of the works. The latter shall be considered to be complete once the workers have abandoned EDPR's facilities.

Works in the wind turbine and high risk works (ex. done on electrical installation, work at heights, hot works, confined space, with risk of entrapment between objects) always has to be performed by team considering at least two people.

Appropriate communications equipment must be available to all members of the team if they do not have visual contact with one another.

It is recommendable that every employee (individually) shall be equipped with a mobile phone that allow to contact with emergency service when needed.

For this purpose, the Contractor is committed to act according to the following requirements:

- Prior to the beginning of the works, the Contractor must upload the company, employee and equipment documentation required by EDPR, as well as that of its subcontractors in the web tool of EDPR. Employees may begin work only after these documents have been approved in the web tool of EDPR.
- During the execution of the works, the contractor must provide access to the different work pits on demand of EDPR employee or other person performing inspection in the name of EDPR. Contractor is obliged to provide access to all HSE related documentation (ex. Work Manuals, MSDS, certificates) that are needed to assess if works are performed in accordance to HSE rules.
- Additionally, the Contractor must have delivered the work procedures and instructions to the person responsible for the work/services at EDPR. Said documents must include the necessary HSE guidelines to ensure that work is carried out safely for both people and the environment, as well as the LOTO locking procedures (Lockout-Tagout) that are applicable to the work to be carried out (communications, electrical, mechanical and/or hydraulic). These LOTO procedures must also be present in the facility, and available to EDPR staff if required, when the work to which they apply is to be carried out.
These documents must include the necessary HSE guidelines to ensure that the work is carried out in a safe manner for both people and the environment and must be validated by EDPR prior to the start of the work.

- Contractor workers and its subcontractors' workers must complete the minimum required training based on the work they will be conducting and as requested by EDPR, through its web tool. It must be taken into account that GWO-certified training will be required in the case of work at height training for working in wind turbine. Also, the GWO modules "First aid", "Fire protection" and "Load handling" must be included. Apart from that, the contractor must take into account the specific mandatory certifications in each country.
- Additionally, in Portugal, all workers that carry out construction, operation, maintenance or demolition works at EDPR facilities shall possess a Basic Safety Training (BST) certificate, acknowledged by EDP. In Italy, the workers must be compliant with the H&S training required by Legislative Decree n. 81/08.
- During the performance of the works, EDPR will have the right to conduct Health & Safety inspections at those locations where the Contractor may be performing the work. The Contractor is obliged to correct any irregularities detected during these inspections and EDPR will have the right to stop the works until the hazards have been eliminated.
- In the event of a near miss or accident, the Contractor, once has stopped the work and/or isolated the area to prevent its consequences from repeating or extending further, will notify the event immediately (by phone, verbally or by e-mail, etc.) to the EDPR person responsible for the installation or the EDPR person responsible for the supervision/management of the work.
- Next, the Contractor must send a Near Miss/Accident Report within a maximum period of 24 hours. Said report must include at least the what, how, where and when the injury/material damage occurred, as well as the personnel/equipment/facilities affected and all the reliable and relevant information available to understand the nature of the event.
- Next, and before the following 72 hours and through the same communication channels, the Contractor will send EDPR a final the Near Miss/Accident Investigation Report. The content of this investigation report shall be, but not limited to description of the incident or event, witness statement (if applicable), root cause analysis and identification, conclusions and action plan related to the root causes analyzed.
- The Contractor must notify to EDPR as soon as possible of any incident or near miss as well as of any unsafe acts or conditions that may arise in the facility areas of EDPR.
- The Contractor shall provide its personnel with the necessary Personal Protective Equipment to perform their tasks. All PPE must be in good technical condition and have valid certificates of inspection according to the applicable regulations.
- To carry out work on the wind turbine, the Contractor must comply with the maximum wind speeds indicated in the Wind Turbine Safety Manual for the different works, for which the Contractor must verify before starting works that the conditions are adequate, as well as

monitoring, either through the wind turbine's own equipment or the Contractor's own equipment, that the necessary conditions are maintained throughout the activity.

- If the use of cranes is necessary, with sufficient time before the start scheduled for the works, the Contractor will provide the Facility Manager with the working procedure and the crane manual. These documents must include the authorized wind speeds for each operation of the crane. In addition, the procedure must define the responsibilities of each figure involved in the work, in relation to decision making / supervision of work. The Contractor cannot leave the crane, in any case, if it is not in safety position.
- Prior to using chemical substances at the Facility, the list of chemical products must be sent to the Facility Manager along with their material safety data sheets (MSDS) in the local language.
- The Contractor shall only use tools, machinery and equipment that are adequate and technically suitable and that have valid documentation, including the CE or INMETRO and equivalents for other geographies marking.
- The Contractor must regularly inspect power tools and must remove them immediately if any defects are detected.
- The Contractor is obliged to have in the installation of the mechanical equipment for the handling of loads appropriate to the work to be carried out.
- The Contractor must verify that the limits required for vehicles – particularly heavy vehicles and cranes – to circulate in adverse weather or poor visibility conditions have been included in his risk assessment and that of its subcontractors. If said conditions and their corresponding measures have not been included in the risk assessment, the Facility Manager may take the decision that is most appropriate in that respect, and may stop, if deemed appropriate, these vehicles from circulating until the weather or visibility conditions improve. The Contractor must accept this decision.
- Cars may only be used in roads meant for road traffic. Driving in the field, meadows, trenches, etc. is forbidden. Facilities that have special driving risks (wind farms or PV plants with high slopes, areas where heavy snow is frequent, etc.) will require the use 4x4 off-road vehicles.
- Any vehicle transiting through EDPR EU & LATAM facilities must be equipped with high visibility vests for the workers (not mandatory in EDPR NA facilities). Additionally, if the legal regulations ask for it, any car transiting through the facility must carry a fire extinguisher.
- With respect to the transiting of heavy vehicles or large vehicles, the Contractor must prepare a Heavy Vehicle Transit Plan for the Facility, which must indicate the paths vehicles must follow depending on the wind turbines that will be visited. The Heavy Vehicle Transit Plan must include a map showing the marked paths on which heavy vehicles will travel, as well as the necessary indications for the operator to drive safely. In the event that the Heavy Vehicle Transit Plan

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should identify any risk situations that require taking action such as, for example, towing, road base repairs, etc. all measures that must be taken must be included in the plan itself prior to the entry of the vehicle. The Heavy Vehicle Transit Plan must be provided in writing to the Facility Manager for review prior to the beginning of the works. Heavy vehicles may not access the facility without the approval of said Plan.

- Cars that are used for transportation of tools and/or materials must have a separate transportation area from the passengers/driver zone. All gas bottles must be transported in a vertical position. Tools and materials transported in the car must be prevented from moving freely in the transportation zone.
- The Facility Manager must be informed of the beginning and completion of the works. For this purpose, the Contractor shall comply with the facility's dedicated entry and exit communication protocol communicated by EDPR.
- The Contractor must provide employees with the work safety procedures or instructions required to perform the works under appropriate conditions of safety. The Contractor must submit the safety manual of the works upon request by EDPR. The Contractor may not begin the works in the absence of a safety procedure of the works and if the employees have not familiarized themselves with it.
- If during the contract execution period the Contractor receives a safety alert notification from EDPR, the Contractor is obliged to relay said information to all its workers and their subcontractors working at EDPR facilities, as well as to deliver to the EDPR person responsible for the installation the signature sheet attesting to said communication.
- In the case of the presence of different contractors performing work at the same site, these will be obliged to:
 - o Appoint a safety and health coordinator to supervise the safety and health of all employees that are active at the same site, according to applicable law in the country or EDPR procedure.
 - o If the appointment of a coordinator of preventive activities is not necessary, they must cooperate jointly. Whenever several subcontractors exist, the main Contractor will have available a Supervisor who shall oversee all of the Subcontractor's work and be present during their execution.
 - o Establish the rules of cooperation.
 - o Notify each and every worker or their representatives of the actions that are geared at preventing any occupational risks that may arise during the execution of the works.

The agreement relative to the appointment of a coordinator and the establishment of rules of cooperation shall be established before the employees begin working at the same site.

In the case of large overhauls, the main Contractor shall appoint the Preventive Activity coordinator, unless otherwise defined according to country's specificities. This approach will ensure a better organization of the work among the smaller companies that may be working simultaneously at the same site.

- The Contractor must issue a written work permit for the following tasks: hot works, works performed on tanks or other confined spaces, work with electrical devices or equipment (works in voltage and consignations).
- The Contractor must request facility manager authorization prior to planning the following activities: rope access, works involving cranes, mobile elevating work platform, suspended work platform.
- The Contractor is obliged to provide the technical measures necessary to respond to emergency situations (such as fire extinguishers, first aid kit, etc.) and ensure that its workers have constant access to these (employee's vehicles and work areas). In the event that any of these devices owned by EDPR are used, EDPR shall be notified immediately so that the supplies that may have been used/consumed may be replaced.
- The Contractor shall have at the EDPR facilities, in the rescue kit (minimum one for two people in EU & LATAM EDPR countries or one for each operator in EDPR NA), an operational defibrillator for each couple of workers who work in the wind turbines, or one for all workers involved in electrical work in substation, as well as with personnel with adequate knowledge and training for its use.
- The Contractor shall carry one first-aid kit per each pair of operators accessing the wind turbine, which they must bring with them to the nacelle.

1.3. Environmental requirements at EDPR facilities in operation

A wind farm/PV plant is an industrial facility located in a natural environment. Remaining and performing work in said installation carries potential risks to the environment.

The Contractor must act with respect for the Environment and local communities and take all the necessary measures to prevent any impact.

Any environmental-related doubts arising during the provision of the services shall be consulted immediately with the Facility Manager.

The Contractor shall execute and/or provide the contracted works/services ensuring the maintenance of good housekeeping of EDPR premises. Once finished, the area shall remain in the same conditions as they were before starting the work.

EDPR has waste collection points for the temporary storage of the waste generated. All generated waste, both hazardous and non-hazardous, shall be properly managed in compliance with the

applicable legislation in force as well as the internal requirements and best practices established by EDPR.

EDPR is responsible for the management of the generated waste, understood as the delivery thereof to an authorized waste transporter/vendor for proper treatment.

Waste will be managed guaranteeing the application of the hierarchy principle that prioritizes prevention, preparation for reuse, recycling or other forms of recovery, including energy recovery, elimination being only an option when none of the above treatments are technical and/or economically viable.

The Contractor's assumption of waste management obligations must be previously authorized by EDPR. For that purpose, the Contractor shall provide all the documentation that evidences the authorization of the waste vendors/handlers, the final treatment to be applied to the different types of waste, as well as any other aspect related to the proper management of waste (waste records, etc.).

The Contractor shall execute and/or provide the contracted works/services with maximum respect for the environment and local communities, taking all the necessary measures to prevent any impact on vegetation and wildlife, watercourses, waterbodies and soils, as well as to avoid air pollution, noise generation and visual impact. For that purpose, the Contractor is committed to act according to the following requirements:

- Do not affect vegetation and wildlife-sensitive areas and protected habitats.
- Respect any cultural/archaeological assets that may exist in the surroundings of EDPR facility premises to avoid their deterioration or damage.
- Ensure that livestock trails remain clear and accessible.
- Ensure that the current land use is maintained and that access to the properties and the free movement of vehicles is guaranteed.
- Limit the movement of vehicles and/or machinery to the strictly necessary to perform the works, only on designated areas and observing the maximum speed of 30 km/h.
- Ensure that vehicles and machinery are up to date with their regulatory inspections.
- Schedule planned noisy activities to be performed near inhabited areas or in sensitive areas due to the presence of wildlife during the most appropriate periods to avoid disturbances.
- Keep drainage systems free to avoid obstructing the flow of water.

- When vegetation clearings are required, Do not carry out vegetation clearing tasks without prior authorization from EDPR And comply with the applicable requirements of the corresponding authorization and the instructions in Annex I. Good practices clearing felling and pruning
- Immediately notify EDPR in case of finding any injured or dead animal or abandoned animal remains (carrion).
- Do not discharge any type of waste or wastewater.
- Extreme precautions in operations involving concrete to avoid spillage, especially in the case of works taking place near water courses.
- Do not light fires.
- Establish procedures to reduce fire/spill risk and adopt all safety measures to that end when executing works that are susceptible of causing a fire or a spill.
- In the event of an environmental near miss or accident, once the works are stopped and/or the area has been isolated to prevent its consequences from repeating or extending, the Contractor shall notify the event immediately (by telephone, verbally, e-mail, etc.) to the EDPR personnel responsible for the facility or to the person responsible for the supervision/management of the work.

Next, the Contractor shall send a Near Miss/Accident Notification Case Report within a maximum of 24 hours. Said report must include at least the what, how, where and when did the near-miss/accident occur, as well as the elements of the environment that are affected, as well as the measures taken and to be taken and any other information that may be relevant in order to gather as many details as possible about the event.

Next and before the following 72 hours and through the same communication channels, the Contractor shall send EDPR a Near Miss/Accident Investigation Report with a determination



of the root cause (applying the 5 Why's analysis method is recommended) and the measures to be taken to avoid it from happening again.

The Near Miss/Accident Analysis Report must be filled out and signed by the person responsible for the works.

EDPR reserves the right to take part in any phase of the accident analysis.



Thank you!

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