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Date: <i>31/05/2013</i>	Date: <i>11/06/2013</i>	Date: <i>12/6/2013</i>

0 CHANGE CONTROL

Edition	Date	Description of the modification
00		Initial edition
01	May 2013	Alignment with HR processes. Update codification.

1 OBJECTIVE AND SCOPE

The purpose of this document is to define the process to ensure the availability of resources for the fulfillment of EMS requirements; to ensure that every person working for EDPR EU in the environmental aspects covered by the EMS, is competent on the basis of appropriate education, training or experience, as well as to identify training needs and take actions to meet them.

This procedure shall apply to every person who may cause a significant environmental impact when working for the company in the facilities and activities included in the EMS scope, set out in the file *Facilities in the EMS scope*.

2 REFERENCES

- ISO 14001:2004 standard
- EMS Manual
- EXPR-EU/EMS-GEN-00005 *Communication*.

3 DEFINITIONS

- **Competence:** personal attributes and demonstrated ability to apply knowledge and skills.
- **Education:** refers to the education and the acquiring skills and proficiency in the use of working methods, equipment, machinery, tools, etc.
- **Environmental Training Program:** document including the annual plan of environmental trainings approved for EDPR EU employees.
- **External training:** training organized and conducted by an external company or external specialists, but coordinated under the training program managed by HR.
- **Internal training:** training internally organized and conducted either by internal specialists.
- **Mandatory training:** mandatory training internally established for each job position regarding the aspects covered by the EMS.
- **Regular training:** training available to all employees through the process of training needs identification and EDPR Training Program approval.

- **Training:** mandatory training, as well as other internal or external training, theoretical-type and awareness activities (courses, lectures, seminars, conferences) or practical sessions (environmental drills, workplace trainings).

4 ABBREVIATIONS

- **EDPR EU:** EDP Renewables Europe.
- **EMS:** Environmental Management System.
- **EMS Manager:** EMS Manager in each country.
- **HR:** Human Resources.
- **HR Manager:** HR manager in each country.
- **IDP:** Individual Development Plan.

5 PROCEDURE

5.1 POSITION PROFILE

EDPR EU has identified the responsibilities of people occupying job positions that have the potential to cause a significant impact on the environment, and keeps updated a database with their CVs.

Information regarding responsibilities is recorded in the Job Description which is determined by the EDPR HR Department together with the involved departments. The HR Department reviews and files the job descriptions, and approves them along with Management.

5.2 TRAINING

5.2.1 Training Catalogue

EDPR HR Department has developed the EDPR Training Catalogue which includes a wide range of training courses for EDPR employees. This Training Catalogue is available on the EDPR intranet.

EDPR EU EMS Manager shall ensure that mandatory training of environmental character is included and updated.

5.2.2 Training program

5.2.2.1 Mandatory training

EDPR EU EMS Manager has established mandatory training of environmental character for each job position which has the potential to cause a significant impact on the environment.

This mandatory training is available in the Training Catalogue.

EDPR EU EMS Manager is responsible for reviewing and updating, if necessary, the mandatory environmental training at least once a year.

5.2.2.2 Identification of training needs. Training Program approval

Every year (September-October), EMS Manager identifies and proposes the environmental training needs for the following year for all employees involved in the EMS. These training needs are recorded in the template TMP-EU/EMS-GEN-00003 *Environmental Training Needs*.

This identification of environmental training needs should include mandatory training, as well as other training considered necessary (regular training), either internal or external, theoretical-type and awareness activities (courses, lectures, seminars) or practical sessions (environmental drills, workplace trainings).

EDPR EU EMS Manager validates these identifications. Finally they are approved by the Country EMS Management Representative. Once approved, the EMS Manager will share it with the HR Manager, the EDPR EU EMS Manager and the trainees involved.

Based on the countries' identification of environmental training needs, every year (November), the EMS EDPR EU Manager shall request to the HR department the mandatory environmental trainings for the next year.

On the other hand, non-mandatory environmental trainings shall be requested by each employee to his/her manager during the evaluation interview as part of the HR process of potential appraisal (November).

HR Manager shall ensure that the environmental trainings identified and documented in the *Environmental Training Needs* template are included in the proposal of training program of the country before submission to approval.

Yearly, EDPR Executive Committee and EDP CAE approve the EDPR Training Plan. Once approved, the HR Manager will send the approved environmental trainings in each country to the corresponding EMS Manager.

Based on this, the EMS Manager reviews the information recorded in the *Environmental Training Needs* template and complete the *Environmental Training Program* template by filling the "Approval" field. In case of being approved any new training of environmental character, not previously identified in TMP-EU/EMS-GEN-00003, it will be also included in the *Environmental Training Program*.

The EMS Manager will send the *Environmental Training Program* to the EDPR EU EMS Manager for the records. Finally, the EDPR EU EMS Management Representative will consolidate the different environmental training programs.

5.2.2.3 Training Program implementation

When carrying out any training course, the EMS manager, in collaboration with the HR Manager, will ensure that attendance registrations are completed properly by all attendees. These records should be kept by the HR Manager.

Periodically, the EMS Manager together with the HR Manager will review the implementation of the training plan. The results will be analyzed in the Management Review.

EDPR HR Department has a file of each employee affected by the EMS, recording relative education and training information. When possible, copies of all documents generated during training will be kept such as course or program content, diploma, satisfaction survey, etc. EMS Manager will collaborate with HR Manager in order to collect all these documents.

Whenever possible, the training activities carried out are assessed to verify whether they have been satisfactory. This evaluation can be done in different ways, for example through the training quality evaluation questionnaires. These records should be kept by the HR Manager.

5.2.3 Induction training

Twice a year, all new hires are invited to a three days journey ("Welcome Day") whose objective is to provide information and knowledge about the different activities performed by the company. Among the different speeches, the Sustainability department performs a specific presentation where the Environmental Management System is explained.

EMS Managers are responsible for communicating the Environmental Policy to all newly hired personnel affected by the EMS, and imparting instruction in the pertinent procedures, as mention in EXPR-EU/EMS-GEN-00005 "*Communication*", as well as continuously encouraging environmental awareness to all employees in order to make them aware of the environmental impacts of their activities.

5.3 RESOURCES

When an EDPR EU employee detects the need of a material resource (equipment, facilities, working conditions, etc.) regarding environmental matters, it should be communicated to his/her manager and/or to the EMS Manager who will then determine if the need is covered, with the approval of the Country EMS Management Representative, if necessary.

If the need for new personnel is detected, it should be communicated to the Country EMS Management Representative who will be responsible for deciding on the matter or to notify to the appropriate person and involving HR.

6 RESPONSIBILITIES

EDPR HR Department:

- Determine Job Descriptions in collaboration with the involved departments.
- Approve Job Descriptions along with Management.
- Keep Job Descriptions updated.
- Keep the CVs database updated.
- Ensure, together with the EDPR EU EMS Manager, that mandatory environmental training is included in the EDPR Training Catalogue and it is reviewed and updated.

- Keep updated files with education and training information of all employees affected by the EMS.

HR Manager:

- Support the EMS Manager after the identification of environmental training needs.
- Ensure that the environmental trainings identified and documented in the *Environmental Training Needs* template are included in the proposal of training program of the country before submission to approval.
- Send the approved environmental trainings in each country to the corresponding EMS Manager.
- Support the EMS Manager to ensure that attendance registration of trainings is properly completed by all attendees.
- Keep attendance registrations.
- Review periodically the implementation of the program together with the EMS Manager.
- Whenever possible, verify and record whether the trainings have been satisfactory (for example, through the training quality evaluation questionnaires).

EMS Manager:

- Identify and propose, with the support of the HR Manager, the environmental training needs for the following year for all employees involved in the EMS.
- Record training needs in the template TMP-EU/EMS-GEN-00003 *Environmental Training Needs*.
- Once approved, share the Environmental Training Needs identification with the HR Manager, the EDPR EU EMS Manager and the trainees involved.
- Review the information recorded in the *Environmental Training Needs* template and complete the *Environmental Training Program* template by filling the "Approval" field based on the approved environmental trainings sent by the HR Manager.
- Send the *Environmental Training Program* to the EDPR EU EMS Manager.
- Ensure, together with the HR Manager, that attendance registration of trainings is properly completed by all the attendees.
- Review periodically the implementation of the Environmental Training Program together with the HR Manager.
- Analyze the results of the Environmental Training Program in the Management Review.
- Communicate the Environmental Policy to all employees affected by the EMS, as well as encourage environmental awareness.
- Determine, when necessary, if an identified need of a material resource regarding environmental matters should be covered.

EDPR EU EMS Manager:

- Ensure, together with the EDPR HR Department, that mandatory environmental training is included in the EDPR Training Catalogue and it is reviewed and updated.
- Integrate and validate the Environmental Training Program proposed by each country.
- Request the mandatory environmental trainings to be performed in each country to the HR department.

Country EMS Manager Representative:

- Approve the Environmental Training Needs identification.
- Approve, when necessary, the acquisition of a material resource regarding environmental matters.
- Decide, when necessary, if an identified need of personnel recruitment should be covered, or notify it to the appropriate person.

EDPR EU EMS Management Representative:

- Consolidate the different environmental training programs.

All employees:

- Request non-mandatory environmental trainings recorded in the *Environmental Training Program* template, as part of the HR Process during the evaluation interview with the Manager.

7 TEMPLATES

- TMP-EU/EMS-GEN-00003 Environmental Training Needs & Program.



GENERAL EXECUTIVE PROCEDURE
COMPETENCE, TRAINING AND AWARENESS

EXPR-EU/EMS-GEN-00004

v.01

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TMP-EU/EMS-GEN-00003

ENVIRONMENTAL TRAINING NEEDS

COUNTRY	
YEAR	

TRAINING COURSE	MANDATORY/REGULAR	INTERNAL/EXTERNAL	REQUIRED DATE	DURATION	IMPARTED BY	ATTENDEES	COMMENTS

Proposed by EMS Manager

Validated by EDPR EU EMS Manager

Approved by Country EMS Management Representative

Date & Signature

Date & Signature

Date & Signature



GENERAL EXECUTIVE PROCEDURE

EXPR-EU/EMS-GEN-00004

v.01

COMPETENCE, TRAINING AND AWARENESS

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ENVIRONMENTAL TRAINING PROGRAM

COUNTRY	
YEAR	

TRAINING COURSE	MANDATORY/REGULAR	INTERNAL/EXTERNAL	DATE	DURATION	IMPARTED BY	ATTENDEES	COMMENTS	EDPR APPROVAL
								<input type="checkbox"/>
								<input type="checkbox"/>
								<input type="checkbox"/>
								<input type="checkbox"/>
								<input type="checkbox"/>
								<input type="checkbox"/>

Prepared by EMS Manager

Date & Signature