

COMMUNICATION

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0 CHANGE CONTROL

Edition	Date	Description of the modification	
00		Initial edition	

1 OBJECTIVE AND SCOPE

The purpose of this procedure is to establish the ways for internal and external communication relating to environmental aspects and the EMS.

This procedure applies to facilities and activities included in the EMS scope set out in Annex IV of the EMS Manual.

2 REFERENCES

- ISO 14001:2004 standard.
- EMS Manual
- EMS-EU/GP-00005 Competence, training and awareness.
- EMS-EU/GP-00006 Control of documents and records.
- EMS-EU/GP-00007 Operational control, monitoring and measurement.

3 DEFINITIONS

- Environmental Performance: Measurable results of the management performed by an organization of its environmental aspects.
- **Stakeholder or Interested Party**: Person or group concerned with or affected by the environmental performance of an organization. EDPR EU stakeholders are:
 - Public Administration,
 - Suppliers and subcontractors,
 - Land owners,
 - Local community,
 - Environmental groups and
 - Other outside organizations affected by the environmental aspects and impacts of the company.

4 ABBREVIATIONS

- EMS: Environmental Management System.
- EDPR EU: EDP Renewables Europe.
- EMS Manager: EMS Manager in each country.



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5 PROCEDURE

5.1 INTERNAL COMMUNICATION

To establish and ensure two-way communication between the different levels of the organization, the EDPR EU EMS Management Representative establishes the following process:

EDPR EU EMS Manager should communicate to EMS Managers, at least, the following elements of the EMS:

- Environmental Policy.
- EMS procedures, technical instructions, etc.
- The results of the audits.

As well, EMS Managers should communicate to the involved employees in the EMS, at least, the following elements of the EMS:

- Environmental Policy.
- Identification and assessment of environmental aspects procedure.
- The operational control procedures to those employees likely to generate environmental aspects.
- Near-miss and emergency preparedness and response procedure.
- The program of objectives and targets.
- The results of the audits.

Regarding subcontractors and service providers, the person responsible for the outsourced work should inform them about the environmental requirements of the EDPR EU EMS as stated in procedure EMS-EU/GP-00007 "Operational control, monitoring and measurement".

The EMS Manager is 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 EMS-EU/GP-0004 "Competence, training and awareness", as well as continuously encouraging environmental awareness to all EDPR EU employees involved in the EMS in order to make them aware of the environmental impacts of their activities.

English is the official language of the EDPR EU EMS; therefore, formal internal communications will be in English, although other languages can be used at local level.

When there is a general communication related to the EMS to the employees, it can be carried out using the most appropriate mean, for example, email or intranet.

EMS Manager may establish other communication channels if appropriate (eg. suggestion boxes, brochures, etc).

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In the case of meetings, depending on its importance, EMS Manager will decide whether to document or not the points discussed and the decisions taken.

Any employee who wishes to make any kind of communication or suggestions may do so in person or via e-mail to the EDPR EU EMS Manager and/or EMS Manager.

If any other person receives an internal communication/suggestion, he/she should inform to EDPR EU EMS Manager and/or EMS Manager in order to register and analyze it. Although there's not mandatory form, records of the documentation generated in the process will be kept.

If the communication/suggestion initiates an improvement action, it will be considered and recorded as a preventive action (EMS-EU/GP-00009 *Non-conformities, corrective actions, preventive actions*).

5.2 EXTERNAL COMMUNICATIONS

Whenever possible, external communications will be written and recorded.

All communications received from stakeholders, defined in section 3, and related to the EMS and/or environmental aspects shall be recorded, studied and answered, as deemed relevant.

Each communication will be analyzed jointly by the corresponding involved departments and EMS functions (depending on the communication matter) and they will be responsible for recording such communications in form EMS-EU/F-00004 "Communications index"

The documents will be filed so that it is accessible, in accordance with the requirements defined in the EMS-EUM/GP-00006 "Document and Registry Control" procedure. The file forms may vary from e-mail to computer files hosted on the EDPR server.

All environmental information that is deemed appropriate to send to external stakeholders of the company (Public Administration, suppliers, local community, etc.) without prior request will be filed in an accessible manner too.

EDPR EU Management decides NOT TO COMMUNICATE externally information regarding its significant environmental aspects.

For matters of particular importance or sensitivity, Country EMS Management Representatives and/or EDPR EU EMS Management Representative will be the responsible for establishing communication with the stakeholders.



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6 RESPONSIBILITIES

EDPR EU EMS Management Representative:

- Establish communication process regarding EDPR EU EMS.
- Establish communication with stakeholders for matters of particular importance regarding EDPR EU.

EDPR EU EMS Manager:

- Communicate to EMS Manager, at least, the Environmental Policy, EMS Documentation and the results of the audits.
- Register, analyze and keep evidence of communications/suggestions received.

EMS Manager:

- Communicate to employees involved in the EMS, at least, the Environmental Policy, Identification and assessment of environmental aspects procedure, operational control procedures to those employees likely to generate environmental aspects, nearmiss and emergency preparedness and response procedure, the program of objectives and targets and the results of the audits.
- Communicate the Environmental Policy to all newly hired personnel affected by the EMS, and imparting instruction in the pertinent procedures.
- Encourage environmental awareness to all EDPR EU employees involved in the EMS in order to make them aware of the environmental impacts of their activities.
- Established new communication channels, if appropriate.
- Decide whether to document or no t the conclusions at a meeting.
- Register, analyze and keep evidence of communications/suggestions received.

Country EMS Management Representative:

- Establish communication with stakeholders for matters of particular importance.

All employees involved in the EMS:

- Analyze communications/suggestions received, when corresponding.
- Record received communications in form EMS-EU/F-00004 "Communications index"

Any employee:

- Make communications and/or suggestions regarding EMS or environmental aspects.
- Inform EDPR EU EMS Manager and/or EMS Managers about any communication/suggestion received.



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7 FORMS

EMS-EU/F-00004 "Communications index"



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