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Prepared	Revised	Approved
 EDPR EU EMS Manager	 EDPR EU EMS Management Representative	 EDPR EU EMS Management Representative
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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 process of planning, implementation and record of the internal audits of the EMS in order to determine whether the EMS elements are fulfilled, and to detect its effectiveness in achieving the environmental objectives established, and the EDPR Environmental Policy.

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

2 REFERENCES

- ISO 14001:2004 standard.
- ISO 19011:2003 “*Guidelines for quality and/or environmental management systems auditing*” standard.
- EMS Manual.

3 DEFINITIONS

- **Audit:** Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent of compliance with the audit criteria.
- **Audited:** Organization which is audited.
- **Auditor:** Person with demonstrated personal attributes and competence to carry out an audit.
- **Competence:** Personal attributes and demonstrated ability to apply knowledge and skills.
- **Audit results:** Results of an audit provided by the auditor(s) after consideration of audit findings.
- **Audit evidence:** Records, statements of facts or other verifiable information and relevant to the audit criteria.
- **Audit Program:** Set of one or more audits planned for determined a period of time and directed towards a specific purpose.

4 ABBREVIATIONS

- **EMS:** Environmental Management System.
- **EDPR EU:** EDP Renewables Europe.
- **EMS Manager:** EMS manager in each country.
- **NC:** Non-conformity.

5 PROCEDURE

5.1 AUDIT PROGRAM

EDPR EU EMS Manager proposes every year the *Audit Program* for the current year, which may be coordinated with EMS Managers, validated with Country EMS Management Representatives and finally approved by EDPR EU EMS Management Representative.

In this Program will be included both, internal and external audits.

The internal audits will be planned so that in the course of a four year cycle, all areas included within the scope of the EMS are subject to an internal audit.

When establishing the frequency and dates, the following factors should be considered:

- The results of previous audits (internal or external), if any,
- Projected dates for external audits,
- Facilities to visit.

Form EMS-EU/F-00015 "*Audit Program*" indicates the scope, the audit criteria, the dates, the objective and the person(s) responsible for conducting the audit.

The Audit Program will be reviewed annually in order to accommodate it to the number and characteristics of the facilities included thereof.

EDPR EU EMS Manager communicates the *Audit Program* to EMS Managers in order to let them inform to all personnel involved.

EDPR EU EMS Manager and EMS Managers will be responsible for coordinating the necessary resources to carry out the audits.

5.2 AUDIT TEAM

The personnel carrying out the audits should be independent of the area audited and meet the following requirements:

- Have completed an environmental management training course of at least 20 h.
- Have completed an environmental audit methodology training course of at least 20 h.
- Have experience as an environmental auditor or observer in at least two audits.

When the internal audit is carried out by an external auditor, he/she must first provide proof of his experience as an auditor to verify compliance with the requirements set by EDPR EU for this role.

5.3 METHODOLOGY

Internal audit is carried out in accordance with the Audit Plan, which is prepared by the auditor coordinator and will be sent to the EDPR EU EMS Manager with a minimum of one week in advance. This plan shall specify the date(s), the audit team, the audit scope and a detailed program of the audit, as far as possible.

Prior to conducting the audit, the auditor, or auditors, must be aware of the audit criteria to be used, i.e. the Environmental Policy, applicable regulatory requirements, procedures, instructions, EMS Manual and any other documents that the auditor deems necessary.

The internal audits are conducted according to the criteria and methods of the auditor appointed by the EDPR EU EMS Management Representative and will always have the objective of ensuring that all activities relating to the environment meet the pre-established conditions and evaluate the structure and effectiveness of the EMS.

Generally, the activities to be performed by the auditor in the internal audits are as follows:

- Review the EMS documents,
- Review the registries to verify compliance with the EMS,
- Verification of material resources (equipment, storage, environmental conditions of storage, etc.),
- Direct supervision of the implementation of the reference standards,
- Monitoring the compliance with legal requirements and other requirements.

In any audit, the following shall be taken into account:

- The investigation does not necessarily need to be limited to the indicated aspects.
- The audit is a sampling, and therefore other undetected non-conformities may exist.
- Only contrasted and objective evidence shall be evaluated, carrying out the interviews deemed appropriate for verification.
- If a possible deficiency is detected, the finding shall be investigated to confirm the finding or not, verifying whether the non-conformity is random or systematic.
- A follow up of the non-conformities highlighted in previous audits should be carried out.

When the audit is completed, the auditor will prepare a report regarding the aspects audited.

If the auditor(s) is (are) external, they may use their audit form. However, audit report should include, as minimum content, the following items:

- Date of audit.
- Date of report.
- Audit team.
- Audit scope.
- Facilities audited.
- People contacted during the audit.
- Summary.
- Audit findings/non-conformities.
- Areas for improvement.
- Assignment of the results of the standard terms of reference.

Based on the audit report, EMS Managers should keep track of the corresponding NCs and monitor the implementation of the corrective actions according to procedure EMS-EU/GP-00009 *"Non-conformities, corrective actions, preventive actions"*.

NCs regarding all facilities or audit findings in the EMS documentation will be recorded by EDPR EMS EU Manager.

EMS Manager is responsible to maintain the audit report regarding the country. EDPR EU EMS Manager files the audit report with the global conclusions for EDPR EU EMS.

The information relating to internal audits is taken into account when conducting the Management Review described in EMS-EU/GP-00011 *"Management Review"*.

6 RESPONSIBILITIES

EDPR EU EMS Manager:

- Propose the Audit Program.
- Communicate the Audit Program to the EMS Managers.
- Coordinate resources to carry out the audits.
- Keep track of NCs regarding all facilities or EMS documentation resulting from audits and monitor corrective actions.
- Receive the Audit Plan from the Audit team and send to EMS Manager.
- Ensure audit team competence.
- File the EDPR EU audit report.

EMS Manager:

- Collaborate with EDPR EU EMS Manager in the preparation of the Audit Program.
- Communicate Audit Program to all people involved.
- Coordinate resources to carry out the audits.
- Keep track of NCs resulting from audits and monitor corrective actions.
- File the audit report for the country.
- Include internal audit results in the Management Review report.

Country EMS Management Representative:

- Validate Audit Program.

EDPR EU EMS Management Representative:

- Approve Audit Program.

7 FORMS

- EMS-EU/F-00015 *Audit Program*.



GENERAL PROCEDURE
INTERNAL AUDITS

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AUDIT PROGRAM

AUDIT N°	AUDIT TYPE	DATE	FACILITIES	AUDIT SCOPE	AUDIT TEAM

Prepared by EDPR EU EMS Manager

Approved by EDPR EU EMS Management Representative

Date & Signature

Date & Signature