

# XUAN THIEN

## HEALTH, SAFETY AND ENVIRONMENT MANAGEMENT SYSTEM MANUAL

### Contents

<b>0. OBJECTIVE AND SCOPE</b> .....	2
<b>1. REFERENCE</b> .....	3
<b>2. DEFINITIONS</b> .....	3
NA.....	3
<b>3. ABBREVIATIONS</b> .....	3
<b>4. INTRODUCTION</b> .....	3
<b>5. ORGANIZATION STRUCTURE</b> .....	4
<b>6. CONTEXT OF ORGANIZATION</b> .....	5
<b>7. LEADERSHIP AND PARTICIPATION</b> .....	6
<b>7.1 LEADERSHIP AND COMMIMENT</b> .....	6
<b>7.2 RESOURCES, ROLES, RESPONSIBILITY AND AUTHORITY</b> .....	7
<b>7.3 COMMUNICATION, CONSULTATION AND PARTICIPATION</b> .....	7
<b>8. PLANNING</b> .....	8
<b>8.1 RISK IDENTIFICATION AND ASSESSMENT</b> .....	8
<b>8.2 COMPLIANCE OBLIGATIONS</b> .....	8
<b>8.3 PLANNING</b> .....	9
<b>8.4 HSE OBJECTIVES</b> .....	9
<b>9. SUPPORT</b> .....	10
<b>9.1 COMPETENCY, TRAINING AND AWARENESS</b> .....	10

9.2	HSEMS DOCUMENTATION AND RECORD .....	10
10.	OPERATION AND CONTROL .....	11
10.1	PURCHASING MANAGEMENT .....	11
10.1.1	HSE in the supply chain .....	11
10.1.2	PPE Management .....	11
10.1.3	Chemical Products Management .....	11
10.2	HSE INSPECTIONS .....	12
10.3	FACILITIES AND EQUIPMENT MAINTENANCE .....	12
10.4	HEALTH EXAMINATION .....	12
10.5	ENVIRONMENTAL MONITORING .....	12
10.5.1	Noise .....	12
10.5.2	Birds & Bats fatalities .....	13
10.5.3	Waste Management .....	13
10.6	CONSTRUCTION WORKS DURING OPERATION .....	13
10.7	CHANGE MANAGEMENT .....	14
10.8	INCIDENTS AND EMERGENCIES MANAGEMENT .....	14
10.9	VISITOR TO FACILITIES AND CONSTRUCTION SITES .....	15
11.	PERFORMANCE EVALUATION .....	15
11.1	MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION .....	15
11.2	. AUDITS .....	15
11.3	MANAGEMENT REVIEW .....	15
12.	CONTINUAL IMPROVEMENT .....	15
13.	HSE GRIEVANCE MACHENISM .....	16
14.	ANNEXES .....	16

**0. OBJECTIVE AND SCOPE**

EDPR constitutes an integrated management system for H&S and ENV aspects to fulfil the organization’s Policies and objectives. This manual is developed with the aim of describing the main elements of the EDPR VN HSEMS, as well as to reference the documents where these elements are more thoroughly explained.

The HSEMS scopes are:

- (A) Energy production by renewable technologies (wind and solar technology).
- (B) Operation and maintenance services in renewable facilities for electricity production.

(C) Office support activities for energy production by renewable technologies, including among others, the management of design, development and permitting and the management of construction.

The concept of EDPR facilities comprise transmission line and photovoltaic plants both owned or managed by EDPR and its subsidiaries namely Xuan Thien Ninh Thuan JSC and Xuan Thien Thuan Bac JSCs

The facilities included in the scope of the HSEMS are detailed in the *HSEMS Facilities scope* file available in the corporate server.

The concept of workers comprises EDPR employees and those from its contracting companies.

## 1. REFERENCE

- ISO 14001:2015 standard.
- ISO 45001:2018 standard.
- H&S Policy.
- ENV Policy.
- IFC standards
- ALIB Standards.
- Vietnam laws

## 2. DEFINITIONS

NA

## 3. ABBREVIATIONS

- **CCP Matrix:** Communication, Consultation and Participation Matrix.
- **EDPR VN:** EDP Renewables Vietnam.
- **ENV:** Environment.
- **ENV Coordinator:** VN Environmental Coordinator for the HSEMS.
- **ENV Manager:** Environmental Manager for the HSEMS in each country.
- **HSEQ:** Health, Safety, Environment, and Quality.
- **HSEMS:** Health, Safety and Environmental Management System.
- **HSEMS Manager:** Health, Safety and Environmental Management System Manager.
- **H&S:** Health and Safety.
- **H&S Coordinator:** VN H&S Coordinator for the HSEMS.
- **H&S Manager:** H&S Manager for the HSEMS in each country.
- **PVP:** Photovoltaic Plant
- **JSC:** Joint Stock Company

## 4. INTRODUCTION

EDPR VN recognizes the importance of protecting health and safety an environment in all its activities, at every level in the company and in every project in which it operates namely Xuan Thien Thuan Bac JSC and Xuan Thien Ninh Thuan JSC hereinafter referred to as “Xuan Thien SPV”

The framework of the HSEMS are both the occupational health and safety and environmental policies and criteria established by the organization to ensure environmental protection and the H&S of all workers providing services at EDPR facilities namely Xuan Thien SPV.

The HSEMS Manual for Xuan Thien SPV contains a description of the EDPR VN H&S and ENV processes, being supplemented with other documents which furtherly develop those sections. It also summarizes EDPR's commitment to HSE issues and describes the organizational structure, responsibilities, functions, practices, procedures, the necessary resources for managing HSE in Xuan Thien SPV the consequent achievement of the objectives set in the H&S and ENV Policies of EDP Group.

Regarding H&S, this Manual constitutes the Prevention Plan in Vietnam and Xuan Thien SPV as it describes the organizational structure, roles and responsibilities, process and procedures, and the resources to implement H&S in EDPR and Xuan Thien SPV.

To achieve the expected results, EDPR Vietnam have identified and interrelated its processes for Xuan Thien SPV in order to manage them optimally and achieve continuous improvement.

## **5. ORGANIZATION STRUCTURE**

The organizational structure of the company is described in the Organization Handbook, available in the EDPR intranet.

HSE matters are covered in Vietnam and its subsidiaries, by the HSEQ department managed by the Vietnam HSEQ Manager, in dependence of country representative of EDPR Vietnam.

The VN HSEQ department has two different areas:

- Health, Safety, Environment
- Quality Assurance

The mission of the VN H&S team in Xuan Thien SPV is to ensure the fulfillment of EDPR Zero Accident Policy by defining processes for the safe management of all the activities in all projects and to give support to the business in the implementation of said processes.

The specific H&S organization in Vietnam and Xuan Thien SPV comply with local regulations requirements.

The aim of the VN Environment team in Xuan Thien SPV is to ensure the fulfillment of the EDPR Environmental Policy, to identify best practices and define standards to ensure a uniform environmental management, aimed at supporting the business, providing value and continuous improvement.

Daily environmental management of particular projects and assets is carried out by the Environmental teams in Xuan Thien SPV, managed by the VN HSEQ Managers, in dependence of the country representative of EDPR Vietnam.

The different HSEMS roles for Xuan Thien SPV defined by EDPR Vietnam to ensure a proper management of Xuan Thien SPV (the relation between the different roles exclusively applies for HSEMS issues) can be found in *HSEMS-VN\_MN-HSE-01\_ANX-01 "Role and Responsibilities"*

These are the main functions of each role:

- **H&S and ENV managers in Vietnam**: ensure the implementation and maintenance of the HSEMS in Vietnam , as well as monitor H&S and ENV performance at country level.
- **H&S and ENV Coordinators of Xuan Thien SPV**: act as interlocutors between the Country H&S and ENV managers for specific issues regarding H&S or ENV. Monitor H&S and ENV performance at Xuan Thien SPV level and ensure that all processes respond to H&S and ENV needs.
- **VN Management Representative**: ensure that, at country level, the HSEMS is properly implemented and maintained, and that management knows its progress, so they can adjust priorities, define resources, and modify plans as appropriate.

## 6. CONTEXT OF ORGANIZATION

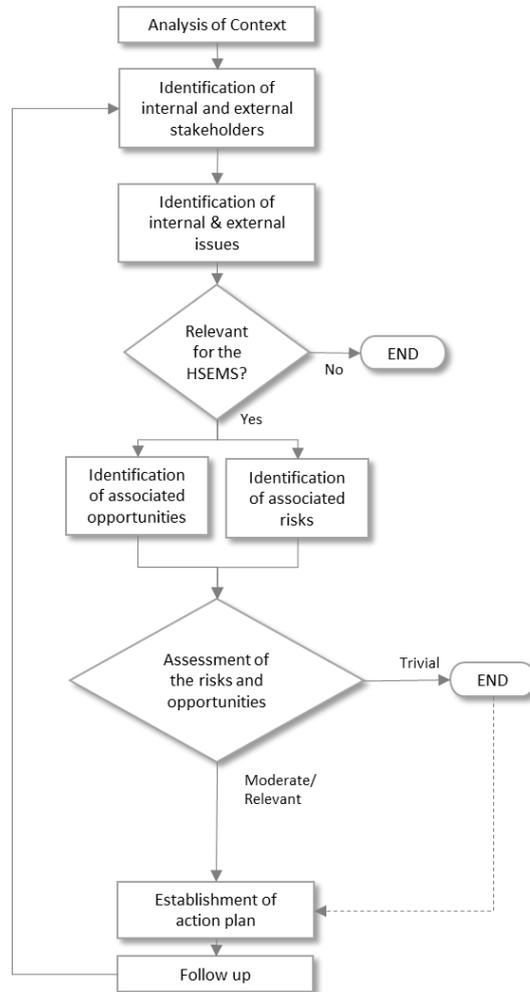
The HSEMS is influenced by the context of the organization, so EDPR analyses it by considering the external and internal issues which may affect the organization’s ability to meet its intended strategic objectives, as well as considers potential changes on that elements so the organization is able to develop the required modifications in the HSEMS.

The identification of the relevant internal and external issues shall consider all factors and conditions that might have an effect on the organization’s approach to its services and interested parties. In this regard, the inputs considered are:

- The identification and mapping of the company relevant stakeholders to understand and consider their needs and expectations, which are or might become a legal obligation or a nonlegal obligation willingly assumed by the organization. This is done at a country level with the inputs of all projects.
- The EDPR materiality assessment, is obtained by crossing the issues identified by EDPR stakeholders with the relevance that these topics have for the company.

At least once a year, EDPR shall elaborate a Risk and Opportunities assessment of the relevant issues identified for Xuan Thien SPV. On a country level a similar assessment will also be elaborated to address Corporate issues.

In the image below, it is represented the process from the analysis of the context, stakeholders' needs and expectations, identification of relevant issues and finally, the risks and opportunities assessment to the establishment of actions to address them. The result of this process is included in corporate tool. The specifics of the process are explained in the *HSEMS-VN\_PR-HSE\_10- “Context Analysis, risks and opportunities identification and assessment”*.



## 7. LEADERSHIP AND PARTICIPATION

### 7.1 LEADERSHIP AND COMMITMENT

It is every employee’s responsibility to effectively implement and maintain the HSEMS, starting with the Top Management.

The Top Management of EDPR demonstrates leadership and commitment to the system:

- Ensuring that the H&S and ENV Policies are established.
- Ensuring compliance with the legal and other requirements.
- Assuming responsibility and accountability in relation to the effectiveness of the HSEMS.
- Ensuring that continuous improvement objectives are established and that are compatible with the strategic direction and context of the organization.

- Ensuring that the requirements of the management system are integrated into the organization's business processes.
- Promoting the use of the process approach and risk-based thinking.
- Ensuring that the necessary resources for the HSEMS are available.
- Communicating the importance of effective environmental management and risk prevention in accordance with the requirements of the HSEMS.
- Ensuring that the HSEMS achieves its intended results.
- Engaging, directing, and supporting people to contribute to the effectiveness of the system.
- Promoting continuous improvement.
- Supporting other relevant management roles, to demonstrate leadership in the way it applies to their areas of responsibility.

## **7.2 RESOURCES, ROLES, RESPONSIBILITY AND AUTHORITY**

EDPR appoints the required roles for the implementation and improvement of the HSEMS of Xuan Thien SPV follow the HSEMS of Vietnam. Some of them are detailed in this document, while general procedures define more precisely the roles, responsibilities, authorities, and the interrelation between people involved, directly or indirectly, in the HSEMS processes. The organization communicate those responsibilities, so all relevant employees are aware and participate in the HSEMS ongoing improvement.

The competence, training, and awareness of direct employees of EDPR or contractor working at Xuan Thien SPV will follow procedure *HSEMS-VN\_PR-HSE-04 "Competence, Training and Awareness"*, which described the process to identify and ensure the competence needed for playing those roles is defined in the general.

## **7.3 COMMUNICATION, CONSULTATION AND PARTICIPATION**

The organization and roles established for the HSEMS of Xuan Thien SPV will follow the HSEMS of Vietnam to ensure bidirectional communications between the different levels of the company. Once employees have appropriate information about the HSEMS and its performance, they are in position to contribute to its implementation and ongoing improvement.

EDPR ensures consultation and participation processes providing required resources and considering employees and relevant stakeholders opinions, involving them in the decision making. H&S employees' representatives, in case they are appointed, will be the main channel to ensure internal consultation and participation.

The process followed by EDPR VN to establish the lines of internal and external communication, consultation, and participation, related to the HSEMS, are defined in the general procedure *HSEMS-VN\_PR-HSE-03 "Communication, Consultation and Participation"*.

In addition to the mentioned procedure, the organization establishes a CCP Matrix to ensure the following questions are clear:

- WHAT: The issue that needs to be communicated or consulted.
- WHEN: Periodically, after a specific event...
- WHO: Issuer.
- TO WHOM: receiver.
  - EDPR staff.
  - Contractors and Subcontractors.

➤ Stakeholders.

- HOW (channel).

The organization keeps and maintain documented information on communications as evidences.

## 8. PLANNING

All required actions to avoid risks and address opportunities related to the HSEMS, H&S and ENV issues of Xuan Thien SPV, will be planned to ensure its completion, as explained in the image below.



EDPR considers the issues addressed in the organization's context analysis, legal and other requirements derived from stakeholders' needs and expectations, H&S and ENV risks, as well as the information from the HSEMS processes, to identify and assess the associated risks and opportunities, to determine the corrective actions and, if relevant, plan them for Xuan Thien SPV.

### 8.1 RISK IDENTIFICATION AND ASSESSMENT

The process to identify hazards and assess the subsequent H&S risks, arising from Xuan Thien SPV's activity and facilities, is developed according to the *HSEMS-VN\_PR-H&S-01 "Hazards Identification and Risks Assessment"*, in which responsibilities and methodologies are defined to ensure risks are avoided or at least, reduced.

Environmental aspects identification and evaluation for Xuan Thien SPV is explained in *HSEMS-VN\_PR-ENV-01 "Identification and assessment of environmental aspects"* procedure, which details how to identify the environmental aspects that the organization can control, and those that it can influence, taking into account the life cycle. In this procedure, it is also established how to determine those aspects that have or may have significant impacts on the environment and prioritize the areas of improvement of Xuan Thien SPV.

EDPR will document its strategic risks and opportunities of Xuan Thien SPV in corporate tool, planning the actions to address them and monitoring periodically their status.

### 8.2 COMPLIANCE OBLIGATIONS

To ensure that legal and other requirements related to environmental and H&S issues of Xuan Thien SPV are always considered, EDPR VN has established the general procedure *HSEMS-VN\_PR-HSE-02 "Identification and Assessment of Compliance Obligations"*, where the methodology for the identification, communication and evaluation of compliance obligations, is detailed.

### **8.3 PLANNING**

EDPR prepares annually the H&S Planning and the Environmental Planning at both country and project level. The aim of these planning is to ensure the implementation of all activities required to ensure a proper management of H&S and environmental matters in Xuan Thien SPV.

From a general point of view, these planning include, among others, the following inputs:

Actions to address:

- HSE risks from risk assessments
- H&S obligations derived from legal requirements and other requirements
- HSE risks and opportunities

Processes to be planned:

- Drills
- Trainings
- Health surveillance
- Occupational environment measurement/monitoring
- Environmental aspects measurement and monitoring
- Consult and participation
- Inspections
- Audits

The H&S Planning is prepared by the H&S Manager ensuring the necessary economic, human and material resources. It is reviewed and approved by Head of HSEQ. Once approved it is communicated to all action responsible employees and managers of the departments involved, who will be directly responsible for its implementation. The effectiveness evaluation of the actions included in the H&S Planning of Xuan Thien SPV will be included in the Management Review of the country (5.1. HSE Performance).

EDPR VN shall ensure that those actions for Xuan Thien SPV are monitored periodically, and operational controls are put in place to eliminate or reduce associated risks.

### **8.4 HSE OBJECTIVES**

In order to reach the commitments established in the H&S and ENV policies, EDPR establishes a HSE Objectives Plan that will be reviewed at least once a year, during the Management review, although its implementation and achievement may exceed this period.

The Plan may be modified, if necessary, if any new activity, process or requirement arises, or as a result of the monitoring of the implementation and achievement of the objectives.

The Plan shall include objectives consistent with the H&S and Environmental policies, taking into account the organization's significant environmental aspects, the associated HSE compliance obligations, the HSE risks and opportunities and the results of the H&S consultation with the workers and/or their representatives, if they exist.

These objectives shall be measurable (if possible), including an associated monitoring indicator. HSE Objectives will be communicated to all employees by the HSEMS VN Management Representative via mail or Workplace once they are approved and will be available in Corporate Tool.

These objectives are set at different levels of the organization, and subject to different monitoring processes:

o **EDPR Vietnam**

Established by the EDPR VN, after consultation with the departments involved.

Inputs for these objectives may be: EDP Group KPIs, EDPR Executive Committee decisions, Efficiency Program and Sustainability Roadmap.

Registered in the Objectives module in Corporate Tool by the HSEMS Manager.

Follow up the status monitoring in the Objectives module in Corporate Tool at least once every six months performed by the HSEMS Manager in collaboration with the H&S and ENV Coordinators, attaching evidence, indicating progress to date, next steps foreseen and/or difficulties, if any.

o **Xuan Thien SPV.**

H&S and ENV coordinator shall propose the necessary H&S and environmental objectives in Xuan Thien SPV. These proposals are reviewed validated by the HSEMS Manager, and finally approved by the EDPR APAC Management Representative. Once approved, the H&S and ENV coordinator and HSE Manager shall communicate them to all employees.

Follow up the status monitoring in the Objectives module of Xuan Thien SPV at least once every four months performed by the H&S and ENV coordinator, attaching evidence, indicating progress to date, next steps foreseen and/or difficulties, if any.

## **9. SUPPORT**

### **9.1 COMPETENCY, TRAINING AND AWARENESS**

EDPR provides its employees with the necessary training to ensure maximum HSE guarantees for the performance of their work.

Regarding the training and awareness of employees in Xuan Thien SPV on issues related to HSE, the procedure *HSEMS-VN\_PR-HSE-04 "Competence, Training and Awareness"*, defines the methodology to ensure that every person working for Xuan Thien SPV, is competent based on appropriate education, training, or experience, as well as to identify training needs and take actions to meet them and to evaluate the effectiveness of the actions taken. Contracting companies employee's adequate education, training or experience is ensured through technical specifications *HSEMS-VN\_TS-H&S-02 "Contractor Management on sites in operation"* and *HSEMS-VN\_TS-H&S-03 "Contractor Management for Construction Sites"*.

### **9.2 HSEMS DOCUMENTATION AND RECORD**

EDPR VN identifies the documents considered necessary for the implementation and maintenance of the HSEMS and ensures they are permanently controlled and available. This identification and control also include documents provided by external parties, such as stakeholders, which shall be analyzed, and, if relevant, stored and addressed to relevant employees.

The document record process in Xuan Thien SPV will follow the general procedure *HSEMS-VN\_PR-HSE-01 "Control of Documents and Records"* defines the process followed by Xuan Thien SPV to develop, approve, distribute, review, store and manage HSEMS documents and records.

## **10. OPERATION AND CONTROL**

The operational control includes the practices, procedures and tools that have been established and implemented in order to maintain a permanent active control of the risk to workers and the environmental aspects that have been identified as significant in Xuan Thien SPV.

### **10.1 PURCHASING MANAGEMENT**

As part of the HSEMS operational control, EDPR understands the need for controlling HSE performance of their suppliers, even for outsourced processes, in the different stages of the purchasing process.

#### **10.1.1 HSE in the supply chain**

The purchasing process for Xuan Thien SPV will follow the procedure *HSEMS-VN\_PR-HSE-09 "HSE in the supply chain"* details the processes established by EDPR VN to ensure the compliance with HSE criteria when acquiring good and services:

- By establishing HSE requirements to qualify suppliers.
- By establishing HSE requirements for goods and services, including PPE and chemical products, prior to purchasing them and including them within contractual documents.
- By establishing documentary requirements for suppliers during the contract execution.
- By controlling suppliers HSE compliance.

All suppliers contracting with Xuan Thien SPV to provide service or good shall comply with no child labor and forced labor as following commitment:

- All children under the age of 18 are not employed for work under the Project
- Take all the measure so that no work or service not voluntarily performed is exacted from an individual under threat of force or penalty (including any kind of forced or compulsory labor, such as indentured labor, bonded labor or similar labor-contracting arrangements, or labor by trafficked persons).
- If cases of child labor or forced labor are identified, take immediate steps to correct them, to prevent similar occurrences in the future, and to facilitate the rehabilitation of victims.

#### **10.1.2 PPE Management**

The election, purchasing and management of Personal Protective Equipment for Xuan Thien SPV is detailed in the procedure *HSEMS-VN\_PR-H&S-02 "PPE Management"*. The procurement of PPEs and clothing will follow the characteristics and specifications described in the "PPEs and work clothes Catalogue".

#### **10.1.3 Chemical Products Management**

Regarding chemical products acquisition and control, any chemical stored or used on Xuan Thien SPV premises shall be accompanied by its safety data sheet. All chemical products purchased must be labelled according to VN regulations. Facility Manager of Xuan Thien SPV is responsible for ensuring that all chemical substances on the facility has available their MSDS/SDS or a minimum set of safety precautions are available on product label, as appropriate.

## **10.2 HSE INSPECTIONS**

The HSE inspection of Xuan Thien SPV shall perform planned and unplanned HSE inspections to control HSEMS procedures compliance, either by EDPR staff or by Contractors, as detailed in the procedure *HSEMS-VN\_PR-HSE-06 "HSE Inspections"*.

Deviations arising from these inspections will be analyzed and corrective actions will be proposed, planned and monitored to ensure they do not recur.

## **10.3 FACILITIES AND EQUIPMENT MAINTENANCE**

EDPR's equipment and facilities maintenance and inspections in Xuan Thien SPV will be planned to ensure that:

- The equipment and facilities comply with the requirements established in the regulations of industrial safety.
- The work equipment is inspected prior to commissioning, to check its adaptation to the requirements established in the applicable regulations. The same inspection is required after any modification or prolonged period of inactivity.
- Work equipment exposed to conditions likely to cause damage that can generate dangerous situations are subject to checks and, where appropriate, tests on a regular basis in order to ensure compliance with health and safety and environmental regulations and to solve those impairments in good time (for example, ensure tightness of wastewater tanks and proper maintenance of septic tanks).

## **10.4 HEALTH EXAMINATION**

EDPR VN will ensure that medical examinations are provided to the direct EDPR employees and contractors working in Xuan Thien SPV according to the legal requirements of Vietnam, to determine whether a potential employee or a current EDPR VN employee and contractors are medically fit to carry out specific duties or to operate.

## **10.5 ENVIRONMENTAL MONITORING**

The environmental monitoring plan for Xuan Thien SPV will follow *HSEMS-VN\_PR-ENV-04 "Environmental monitoring"* depending on its compliance obligations, the conclusions reached by previous studies, the environmental performance, and the technical and economic possibilities following EDPR policy and standards as well as the requirements of interested parties.

### **10.5.1 Noise**

The overall concept of noise sensitive receptors includes residential uses, schools, churches, and medical facilities. Nevertheless, the concept scope should be established based on the applicable legislation and other requirements of interested parties.

In addition, a noise measurement will be carried out if any of the following situations occur:

- Any written noise complaint.
- Significant changes in the facility: a new noise assessment will be undertaken or a noise modeling will be performed or a report will be prepared with the arguments to support that there will be no impact on sensitive receptors.
- Significant changes in the applicable noise limits: last measurement results will be compared with these new applicable legal limits and or interested parties' limits.

#### **10.5.2 Birds & Bats fatalities**

Birds and bats fatalities shall be always monitored and measured in the following circumstances:

- Facilities where birds/bats fatality monitoring is mandatory (by law, permit requirement, etc),
- Facilities where birds/bats fatality monitoring is carried out as a result of an internal decision of the company,
- Facilities where birds/bats fatality monitoring is carried out as a result of compliance with interested parties' standards.

In these cases, it shall be prepared a plan of visits to the facility which enables to collect information about the fatalities of birds/bats.

At least, the following data shall be collected in a database in case of the detection of a dead bird/bat:

- Date
- Facility name
- Location of the dead bird/bat in the facility (nearest point: turbine nº, etc)
- Scientific name of the species
- Nº of dead individuals (of the same species in the same date and facility)
- Protection status according to the Red List of the IUCN

The IUCN (International Union for Conservation of Nature) is an internationally recognized body in the field of nature conservation and sustainable use of natural resources. The IUCN Red List will be used as a reference for the protection status of species. In addition, national catalogues/lists may be also used, if appropriate.

#### **10.5.3 Waste Management**

The waste management in Xuan Thien SPV will follow procedure *HSEMS-VN\_PR-ENV-02 "Waste Management"*, this procedure describes the process followed by EDPR Vietnam to properly manage all waste generated during the operation and maintenance activities of facilities.

### **10.6 CONSTRUCTION WORKS DURING OPERATION**

In the event that there is a need to carry out any construction work in Xuan Thien SPV, it is important to ensure that it is performed in a respectful way with the environment.

For this, the provisions of the technical specification *HSEMS-VN\_TS-ENV-01 "Environmental Management during Construction"* will be followed. If the construction work is performed during the operation phase, the figure

equivalent to the EDPR Construction Manager would be the Facility Manager and the figure equivalent to the Project Manager would be the Asset Manager, for the purposes of said document.

Regarding H&S, the provisions of construction works during operation are covered by technical specification *HSEMS-VN\_TS-H&S-05 "H&S Management during Construction"*.

### **10.7 CHANGE MANAGEMENT**

EDPR monitors and manages planned, temporary and permanent changes that impact HSEMS performance of Xuan Thien SPV, including:

- New products, services and processes or changes in them.
- Changes in legal and other requirements.
- Changes in working conditions.
- Work teams.
- Changes in knowledge/information on hazards and risks for HSEMS.

These changes that may affect the HSEMS are monitored in the HSE Subcommissions, and Commissions, to study whether they may generate new risks and opportunities. The consequences of the changes are reviewed to take action to mitigate any adverse effects as necessary.

If the change is relevant, to follow up and monitor it, an activity will be created in the Record Management module in corporate tool under the label "Change management".

### **10.8 INCIDENTS AND EMERGENCIES MANAGEMENT**

Incidents and emergencies management of Xuan Thien will follow the procedure *HSEMS-VN\_PR-HSE-05 "Incidents Management"*, which aims to explain how to identify, respond, record, analyze and report near misses, incidents and emergency situations, as well as to take the necessary actions to prevent and/or mitigate them.

This procedure is verified periodically and, if necessary, reviewed, particularly after the occurrence of an incident or emergency situation, in order to verify its effectiveness.

In addition to the mentioned procedure, all facilities and offices owned or rented by EDPR VN have an Emergency Plan developed as indicated in the country's legislation, which will include identification and response plans to potential emergency situations to minimize impact for personnel, the community or the environment. In construction works, the Emergency measures are included in the Construction Plan.

The implementation of Emergency Plans through drills, will be coordinated by the H&S Manager in the offices and by the O&M department in case of the facilities. The O&M department will communicate the H&S manager and the ENV manager the execution of the drills and will give them access to the drill reports.

Every entity shall perform periodic evacuation and emergency drills, according to their own regulation, to ensure that every employee and contractors' staff is properly trained and aware about the procedure to be followed during an emergency, and to check that those procedures work and are effective. The drills will be managed by the Facility Manager, supported by the ENV/H&S Manager, if needed. Together they will define, if necessary, an action plan that will be uploaded in corporate tool by the H&S manager or the ENV Manager

These drills shall cover theoretical aspects as well as practical patterns regarding mitigation and response actions to be taken for the different situations, including both H&S and environmental aspects. All EDPR or contractor employees or working at Xuan Thien SPV on behalf of EDPR, who have the potential to be exposed, be part or cause an emergency situation and/or incident, shall attend those drills.

The emergency drill organizer will prepare a report after every drill describing the strengths and improvement points. This report will be shared with the H&S and ENV Managers. If there is a need of an action plan regarding the improvement points detected during the drill, the H&S and ENV Managers will upload it in the record management module of corporate Tool. This information will be an input for the Management Review.

### **10.9 VISITOR TO FACILITIES AND CONSTRUCTION SITES**

A visit to Xuan Thien SPV is not a common situation, therefore it should be handled carefully to assure that all the visitors are aware of the risks, preventive measures and applicable emergency procedures. This process is described in the *HSEMS-VN\_TI-H&S-04 "Visitors and Access Management"*.

## **11. PERFORMANCE EVALUATION**

### **11.1 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION**

EDPR VN has established processes to ensure the monitoring and measurement of HSE aspects and periodically assess its HSE performance. The HSE performance of Xuan Thien SPV is evaluated during the Management review defining the appropriate actions to ensure continual improvement.

### **11.2. AUDITS**

The process for the development, planning, implementation, evaluation and record of the audits of the HSEMS of Xuan Thien SPV is detailed in the general procedure *HSEMS-VN\_PR-HSE-07 "Audits"*. The purpose of these audits is to obtain objective information about the operation of the HSEMS, allowing the detection and identification of any possible deviations and/or anomalies and to propose the appropriate solutions (corrective actions).

The Audit program includes the scope, the audit criteria, the dates, the objective and the person(s) responsible for conducting the audit, which must not be part of the audited activity.

### **11.3 MANAGEMENT REVIEW**

The management reviews the HSEMS of Xuan Thien at least once every twelve months and will follow the section 12.3 of the procedure *HSEMS-VN\_MN-HSE-01 "Vietnam HSEMS Manual"*, this section describes the process, frequency, and requirements for the management review of HSEMS in EDPR Vietnam.

## **12. CONTINUAL IMPROVEMENT**

EDPR VN has established different processes in which continuous improvement is promoted, such as the planning process with its risks and opportunities identification, internal audit, or improvement objectives. All improvement opportunities considered relevant for the organization are planned and subject to monitoring.

To involve all employees of Xuan Thien SPV in the continual improvement process, Xuan Thien SPV will follow the process described in the procedure *HSEMS-VN\_PR-HSE-04 "Communication, Consultation and Participation"* procedure.

In the event of finding any non-compliance in Xuan Thien SPV will follow the procedure *HSEMS-VN\_PR-HSE-09 "Findings Management"* which established by EDPR VN to identify, record, analyse, and monitor non-conformities, areas of improvement, observations and subject to monitoring, as well as to establish the necessary actions to solve the deviation so they do not recur or occur elsewhere.

### **13. HSE GRIEVANCE MACHENISM**

The management of HSE complaints in Xuan Thien SPV will follow procedure *HSEMS-VN-PR-HSE-11 "Management of HSE complaints"*, this procedure is to define the process to identify, record and respond to the HSE complaints of the employees, contractors, suppliers, any workers working in Xuan Thien SPV, and stakeholders affected by the Organization, ensuring that the essential requirements for its effective control and management are in place.

### **14. ANNEXES**

HSEMS-VN\_MN-HSE-01/[ANX-01] *"HSEMS roles and responsibility"*