

## Suppliers Sustainability Guide



## 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:

| 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.



# H&S and Environmental Requirements for Construction suppliers



#### H&S and Environmental Requirements for EDPR Construction Suppliers

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## Purpose and Scope

The purpose of this document is presenting the safety, health and environmental requirements (including as environmental requirements those regarding social, cultural and archaeological assets) that must be fulfilled prior to the beginning of the construction works as well as the applicable rules that must be followed during the execution of the contracted services, the rules for the use of the worksite and the existing internal procedures at EDPR construction sites, which shall also be binding upon any entity providing services.

Becoming familiar with this document and acknowledging that it has been properly understood is a necessary condition for

contractors to obtain authorization to begin the works on behalf of EDPR.

The Contractor is responsible for ensuring that its employees and subcontractors likewise familiarize themselves with the rules herein provided, enforcing compliance therewith at all times.

This document applies to all those contractors and workers who provide their services at EDPR construction sites.

EDPR facilities are understood as all those that are owned and/or managed by EDPR.



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## Compliance

The Contractor shall strictly comply with all laws, orders and rules, either local, municipal, regional, state, country or European (for this last, except for LATAM countries), licenses, authorizations and permits, which may apply to the execution of the works or provision of the services included in the scope of the Contract. Furthermore, the Contractor takes on the obligation to indemnify and exempt EDPR and its employees and representatives from any liability arising from non-compliance due to actions or omissions, even if this might be required from EDPR or its employees.

The Contractor shall adopt all measures required to comply with the rules in force in terms of Occupational Health and Safety, Environment, Social, and Cultural assets. As a consequence of

this engagement, 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 follow the standards, internal codes and policies, procedures and rules provided by EDPR. Without detriment to the foregoing, the Contractor shall comply with its obligations regarding cooperation and coordination between contractors as required by law.

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 Health and Safety supervisors) based on the total number of workers it has in the field.

Likewise, EDPR will establish the minimum requirements related to H&S supervision that the contractors must carry on in their works. Also, if it is required the Contractor must have specialized staff in monitoring the rest of the matters to ensure compliance with legal requirements and the provisions of this guide.

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 with HSE rules.

The Contractor shall provide to EDPR, according to the contractual terms, before starting the works or whenever requested to do so, of the following points:

H&S plans that must include detailed procedures for all the works that are considered high risk activities (work at height, load handling, electrical works, confined spaces, trucks loading/ unloading activities, crane transfer between platforms and others that could be established in the countries law, emergency situations and evacuation and risk assessment).

| Evidence that, during the execution of the works, the Contractor is aware of the environmental specifications that the project may have and acts with maximum respect for the environment, the local communities, and the cultural assets, taking all the necessary measures to prevent any impact.

| Evidence that the contractor has proven training and adequate means to act efficiently in case of HSE emergencies.

| Evidence that the Contractor is executing the Contract observing the local HSE rules and regulations.

| Evidence that, prior to the commencement of the works, the Contractor has provided to its workers (internal, external, temporary workers) adequate means and training to deal with the HSE risks of the work that they shall perform. Also, workers must be informed about HSE measures regarding such work, the protective equipment to be used and the measures to adopt in emergency situations. A proof of this specific training must be provided to EDPR.

| Evidence that the Contractor has all the records of inspections and maintenance performed on tools, machinery and vehicles.

Prior to the commencement of work and during ongoing activities at construction sites, during installation and commissioning, the contractor must perform a last-minute risk assessment (LMRA) in order to define the actions to be implemented. This LMRA must be approved by the site manager/technical assistance before the beginning of the task. All records of this LMRA must be kept on site and provided at any time to EDPR on request and at least at the end of each month or in during HSE inspections. In case one condition is not met, a mitigation measures must



be defined and approved by the site manager/ technical assistance before starting the works.

The LMRA it is mandatory for high risk works. This means any work that involves a high likelihood of injury for which the consequence of injury is severe. The type of injuries can include — contusions or fractures, sprains and strains and burns or poisoning from a hazardous substance. These high-risk works could involve also significant environmental damages related to fires and spills.

All those tasks that are carried out in a single day will be considered as one job. For those tasks that involve several days of work, each of those days of work will be considered as work in order to perform a LMRA.

High risk Works include works related to:

- Risk of entrapment, sinking/ burying or falling from a height.
- Chemical or biological risks likely to cause occupational diseases or environmental damage.
- lonizing radiation, when the designation of controlled or supervised areas is mandatory.
- Electrical lines/installations or in their vicinity.
- Roadways that are in use, or in their proximity.
- In wells, tunnels, galleries, or compressed air boxes.
- Involving the use of explosives, or likely to give rise to risks derived from explosive atmospheres.
- · Handling and lifting loads.
- Activities that may cause fires (for example, if sparking equipment is used, or if the surrounding vegetation is very dry and there is a danger of fire) and/or spills (when there is for example transfer of oils or any other chemical substances) that may cause damage to the environment or may cause fauna fatalities.

| Before the start of particularly hazardous work (hot work, work with electrical risk, work with explosives or work in confined spaces), the worker responsible for carrying out the work must have the corresponding written authorization of the Permit to Work. This documentation must be available on site and/ or in the tool defined by EDPR for this purpose.

When the contractor uses temporary workers on the construction site, this kind of workers must receive a deep HSE induction in all the rules that are applicable on site but also on the working instructions they have to apply.

EDPR shall supervise the application of the Health and Safety rules and Environmental requirements and shall not waive the Contractor from its responsibility to comply with them.

Notwithstanding the responsibilities assumed by the Contractor, if EDPR notices any non-compliance with the regulatory and/ or contractual Health and Safety and/or Environment rules, it shall report such noncompliance to the Contractor so that it may immediately correct the flaws identified; the Parties shall agree on the implementation measures and deadlines necessary to resolve such defects. These non-compliances may be reported through the Construction Safety Coordination/Environmental Supervisor, through the supervision team, by the construction management or by the H&S/Env of EDPR. If the required measures are not immediately taken by the Contractor to effectively solve the problem, EDPR reserves the right to suspend the work, and hold the Contractor responsible for the economic effects of such suspension; despite this, EDPR is entitled to



resolve the Contract, if the non-compliance circumstances are considered serious enough or are not addressed in due and timely manner. Breaches of Environmental, Safety and Health requirements and conditions in the workplace that must be complied with in the contractual relationships between EDPR and the Contractors in accordance with the applicable legislation as well as the criteria required by EDPR (Sustainability Guides) would be managed based on the criteria defined in the HSE Disciplinary and Sanctioning Regime for Contractor Companies of the EDP Renováveis Group.

Before starting the works, the Contractor must have delivered the necessary company documentation related to the work procedures and instructions, workers and equipment required by the person responsible for the work/services at EDPR/H&S Coordinator/Environmental Supervisor/ web tool that EDPR puts at its contractors' disposal. Said documents must include the necessary HSE guidelines to ensure that the work is carried out safely for both people and the environment and must be validated by EDPR or its representative prior to the start of work.

In addition to this document, which includes general H&S and environmental information, EDPR may provide a detailed H&S specification/ environmental specification applicable for contracted works. The Contractor is obliged to familiarize and accept this specification before the Contract execution.



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## **HSE Management System**

EDPR has implemented an Integrated Health and Safety and Environmental Management System developed and certified according to international standards ISO 45001 and ISO 14001.

The Integrated Management System constitutes the framework that establishes the procedures to guarantee the adequate management of health and safety and environmental risks and incidents in EDPR facilities and worksites. Therefore, the Contractor must commit to:

to ensure full compliance with the procedures provided by EDPR related to the works or services included under the scope of the Contract, to participate in the internal and external audits required under the Integrated Management System,

to participate in the drills eventually organized by EDPR in its facilities/worksites as well as other training or activities programmed by EDPR,

| to collaborate in the inspections performed by EDPR and commit to immediately correct the anomalies identified to immediately notify HSE incidents and collaborate in the investigation process,

| to let EDPR perform audits of contractors' own HSE processes.



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## Client-contractor Relationship

#### 4.1 General considerations

The protection of the environment, respect for the communities in the area of influence and the safety and the health of everyone working in the performance of EDPR's activities, that is, employees and service providers, contracted or subcontracted, are fundamental values and priorities to EDPR.

Based on this, this document has been developed with the purpose of providing the minimum requisites that must be complied with during the performance of any activity at EDPR worksites.

This document is binding upon the entire company and upon the physical persons who may provide services to EDPR or to vehicle companies present at EDPR worksites.

The contractor must provide data on

their health & safety and environmental performance whenever they are required by EDPR to demonstrate compliance with the requirements included in this guide.

#### 4.2 Communication

The first point of contact at EDPR construction site for any aspect mentioned in this document will be the EDPR Construction Manager.

The e-mail addresses and the telephone numbers of the persons responsible for each contractor shall be available to all parties involved and posted at the construction site.

In sites where the legislation of the country requires it, EDPR will appoint an Occupational Health and Safety Coordinator (CSS), who



will supervise the execution of the works and coordinate the activities to avoid unnecessary risks. The CSS will be EDPR's main liaison for the H&S area during the execution of the works. In sites where the law does not require the appointment of the CSS, the Contractor shall be responsible for coordinating all H&S activities during the execution of the works.

The Contractor is obliged to communicate to EDPR all the relevant HSE events and incidents that occur during the execution of the works.

EDPR will name an Environmental Supervisor responsible for the coordination and environmental supervision of the works.

EDPR will name a Social Supervisor (if applicable) responsible for the coordination and social supervision of the works.

Likewise, when required, EDPR will appoint an Archaeologist in charge of the coordination and archaeological supervision of the works.

Environmental Supervisor, Social Supervisor and the Archaeologist shall be present at the meetings taking place during the construction works (the attendance of the Archaeologist shall be specified after defining the archaeological control calendar based on the works planning), providing relevant information on the environmental/social/archaeological monitoring.

The Contractor is obliged to communicate to EDPR all the environmental events and incidents that occur during the execution of the works. 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 in EDPR facilities, as well as to deliver to the EDPR person in charge at the installation the signature sheet attesting to said communication.

#### 4.3 Subcontracting

The Contractor is under the obligation to inform its subcontractors about the conditions indicated in this document.

The Contractor shall always be liable for all actions of its subcontractors, as well as for the obligations taken in the execution of its works, regardless of their type.

The subcontractor's staff will have the same obligations to EDPR as the Contractor.

The Contractor will be responsible for ensuring that all its subcontractors follow the indications contained in this document.

For EDPR, the Contractor will be considered as the sole liaison, and any breach by a subcontractor will be considered as a breach by the Contractor himself.

The Contractor will be obliged to inform the Client about the fulfillment of all labor, social and other obligations of its own personnel and its subcontractors.

EDPR shall not be liable to any subcontractor, or its personnel, for any complaint arising from the Contract; and the Contractor must provide an express renunciation in writing by the subcontractor to any right to claim EDPR any amount owed by the Contractor to the Subcontractor.



#### 4.4 Training and qualification

Contractor workers and its subcontractors' workers must complete the minimum required training based on the work they will be conducting.

Contractors are responsible to provide adapted trainings to subcontractors on all applicable HSE rules and specific work instruction / methods to be applied or/and mandatory by contract.

The use of the temporary workers must be supervised by experienced technical leaders of the task to be done. A nonexperienced worker must be supervised by at least 1 experienced person.

In Portugal, all workers that carry out construction, operation, maintenance or demolition works at EDPR work sites shall possess a Basic Safety Training (BST) certificate, acknowledged by EDP.

Likewise, all certificates of any training records surrendered to EDPR, or H&S Coordinator/ Environmental supervisor/ Web tool, must be valid before the start of the works.

#### 4.5 Inspections

#### 4.5.1 Conducted by EDPR

During the performance of the works, EDPR employees /H&S Coordinator/Environmental Supervisor/Social Supervisor will have the right to conduct Safety, Health and Environmental inspections at those locations where the Contractor may be performing the work. The inspection may include the workplace, machines and tools, personal

protective equipment and work processes.

The Contractor is obliged to correct any irregularities detected during Health and Safety, Environmental and Social inspections as soon as possible or within the deadline established by EDPR/H&S Coordinator/ Environmental Supervisor/Social Supervisor.

EDPR/H&S Coordinator/Environmental Supervisor/Social Supervisor will have the right to stop the works until the hazards have been eliminated should it detect any manifest negligence with respect to compliance with the health and safety, or environmental and social rules and regulations. The result of these inspections will be sent to the contractor.

Those HSE inspections could take place without any prior information to the contractor.

#### 4.5.2 Conducted by the contractor

During the performance of the works, the Contractor shall perform its own Health and Safety and Environmental inspections of how the work is being conducted. These inspections must include, at least, the workplace, machinery and tools, personal and collective protective equipment, and work processes. Inspections must be conducted at least monthly.

The Contractor must notify EDPR and correct any irregularity that may have been detected during the inspection without delay and within the deadline established by EDPR.

EDPR may request the Contractor to submit reports of these inspections at any time.



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# Health and safety requirements at EDPR construction sites

All Contractors will be selected not only for expertise in their area of service but with strong emphasis and weighting to their safety performance and ability to meet safety standards, which will allow EDPR to achieve an injury and incident free vision. While there is no doubt that poor safety performance can be changed over time is better served by selecting contractors and suppliers who share the same safety vision.

#### 5.1 General H&S rules

All people on site (workers and visitors) should be familiar with and follow the general rules below, without detriment to what is established in the health and safety plan defined for the works:

All workers of the contractor and its subcontractors must participate in the Toolbox Talks organized by the H&S coordinator for which their presence is requested. These Toolbox talks will include the different risks of the different activities (electrical risk, falls from height, how to act in the event of finding a wild or poisonous animal...).

Observe the safety signalization; the marking of excavations corresponding to foundations must be located at a minimum distance of 1.5 m from the edge of the excavation. In the event that said excavation borders a path for people or vehicles to pass through, safety fencing must be used in said area.

Usage of the machines, devices and equipment



not according to the purpose is forbidden;

Usage of the firefighting equipment and first aid not according to their purpose is forbidden;

Transit on the construction site is allowed only in designed roads. Is forbidden to use short cuts which can be dangerous;

| Entering to excavations is allowed only in through designed accesses;

It is forbidden to pass under the hanging loads;

In case of an emergency situation or incident it is necessary to immediately evacuate the danger area, keeping the attention on the hazards around us;

All workers are obliged to use the necessary PPE's on the construction site, depending on the work they are performing the minimum PPEs to stay in an EDPR construction site are: safety boots, high visibility vest and helmet;

It is necessary to keep attention to the construction machinery working on site. Always must be kept the rule of limited trust and is necessary to remember that, in construction sites, building machines, truck and cars always have priority to the pedestrian;

| Workers are obliged to follow the speed limit which is binding on site (30 km/h).

| It is forbidden to work and/or drive any vehicles under alcohol or drug influence;

| It's forbidden to use the mobile phone while driving on site It is not allowed to park the vehicles in the working areas of machines; they should be stationed in the designated areas for this purpose in the direction of departure.

It is forbidden to use equipment by unauthorized people or without necessary certificates or training;

It is forbidden to be on the construction site in case of hard weather conditions, like storm and storm with lightning;

If it is necessary to perform works during the night, proper lighting conditions for the works should be provided.

| Electrical devices must be properly insulated;

It is forbidden to use broken or defective devices, tools or equipment;

| Connectors of the electric circuit have to be kept in the ideal conditions;

Access roads cannot be blocked during assembly of the crane and during works when it is necessary the space for the maneuver;

Access roads to the construction site must be accessible for the emergency vehicles;

It is forbidden to use any chemical substances, that have not been notified before and do not have Safety Data Sheet. All safety data sheet must be provided to the HSE supervisor.

All workers are obliged to notify EDPR any accident, near miss, unsafe condition and unsafe act that may happen in the construction site;



the property on the construction site;

All works should be provided in the way, which do not create any additional hazards and don't disturb the works of other people.

It's forbidden to throw cigarette butts on the construction sites and smoking is only permitted in dedicated areas

#### 5.1.1 Definitions

For the purpose of this document, the following shall be understood:

EDPR: All companies of the EDP Renováveis Group.

EDPR facilities: facilities owned by EDPR and/or facilities managed by EDPR.

Contractor Company: A physical or legal person who maintains a contractual business relation with EDPR.

Work accident: Any corporal injury suffered by the worker of a Contractor Company on the occasion of or as a result of work performed for EDPR by said Contractor Company as part of the contractual relationship with EDPR.

Accidents taking place at the Contractor's worksite as well as those that may occur while commuting to and from work are excluded from this document.

Days Away From Work Accident: DAFW accidents will be understood to be those work-related accidents whose outcome causes the injured worker's to be absent from the job

for at least one workday (the day on which the accident occurs will be understood to be excluded from the calculation). A DAFW accident must be accompanied by the medical leave report from the Occupational Injury and Illnesses Workers Insurance Company.

Multiple, Severe, Highly Severe or Fatal Work Accident: These types of accidents will be understood to include work-related accidents that cause the death of the worker or that are classified as severe or highly severe by the local regulations of the country or the Occupational Injury and Illness Workers Insurance Company of the Contractor, or that affect more than four workers belonging to (or not) the Contractor's workforce.

Near miss: A spontaneous unforeseen event that originates from the activity being performed by a Contractor Company that does not cause injury, damage, or a deterioration to the worker's health, but which hinders the normal operation of the works and can also be the cause of future accidents.

Accidents taking place in the Contractor's worksite as well as those that may occur commuting to and from work are excluded from this document.

Events with damages to people and/or installations external to the work activity: These will be understood to include those events which, as a result of the work performed for EDPR by the Contractor, have caused damage to the health of someone external to the activity being performed as part of the existing contractual framework between both companies and/or to the installations or elements owned by people or entities external to EDPR.



### 5.2 Incidents – accidents, near misses and unsafe acts and conditions

The Contractor must have defined an emergency procedure to be able to act in case of an emergency occurs.

In case of an accident, the Contractor must first provide first aid to the victim and protect the place of the accident in order to avoid additional harm, also for the subsequent investigation.

The Contractor must notify as soon as possible of any incident, near miss or unsafe act or condition as well as of any unsafe acts or conditions that may arise in the construction sites of EDPR.

The list/ number of the first aiders of the contractors must be visible communicated and adapted to the number of workers present on site.

## 5.2.1 Near miss and accident reporting at EDPR construction sites

In the event of a near miss or accident, the Contractor, once stopped the works and/or isolated the area to prevent its consequences from repeating or extending any further, shall notify the event immediately (by telephone, verbally, e-mail, etc.) to the EDPR person responsible for the facility or to the EDPR person responsible for the supervision/management of the work or the CSS, if any.

Next, the Contractor shall send a Near Miss/ Accident Notification Case Report within a maximum of 24 hours. The referred report must include at least what, how, where and when did the injury occurred, as well as the personnel/ equipment/installations affected and all reliable and relevant information available in order to understand the course of the event.

Next and before the following 72 hours and through the same communication channels, the Contractor shall send EDPR a final Near Miss/ Accident Investigation Report. The contents of the investigation shall include, among others, a detailed description of the incident or event, witness statements identification and analysis of the root cause, conclusions and action plan related to the root causes analyzed, as well as photographs of the near miss/accident. EDPR reserves the right to verify the information provided by the contractor, who shall at all times cooperate with EDPR in this task.

In addition, the Contractor must submit monthly to EDPR's H&S department a file with information of all near misses occurred in that month at EDPR construction sites.

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

The Contractor is obliged to collaborate with the CSS and EDPR, as well as with the Labor Authority to investigate all incidents and provide all requested safety information.

EDPR reserves the right to take part, jointly with the Contractor's Safety Specialist, in any phase of the workplace accident's analysis, for which purposes the Contractor's Safety Specialist will work in coordination with EDPR's technical and safety leads.



The Contractor must take corrective/preventive actions as a result of the incident analysis as well as any other actions that could be recommended by EDPR and send evidence of having undertaken the corresponding actions.

In addition to the above and in the case of work related accidents involving medical leave, the Contractor shall send a copy of the medical leave report stamped by the entity covering the accident's contingency (Occupational Injury and Illness Workers Insurance Company, etc.) to the person responsible for the supervision/management of the works of both its workers and workers of companies with which it may subcontract works as part of the Contract.

The Contractor shall use the same communication channels to notify the return to work of the worker or the termination of his/her work relationship, using documentary proof of said circumstance.

In the event of a multiple, severe, highly severe or deadly work-related accident, the Contractor shall send the Accident Notification Report within a maximum of 12 hours from its occurrence.

Additionally, and in accordance with Local Laws, the Contractor must report, within the established deadlines, all severe and/or fatal accidents to the identified official entities or Labor Authorities.

## 5.2.2 Notification of events resulting in damage to people and/or installations external to the work activity

In this case, the Contractor shall send a

Notification Report within a maximum of 24 hours describing the events, including as much information as may be known and be relevant in order to ascertain the nature of the event (what, how, where, when, why, etc. did the injury/illness occur).

The Notification Report must be completed by the Contractor's work supervisor.

Next and before 72 hours and using the same communication channels, the Contractor shall send a full report of the facts to EDPR, including an economic assessment (if possible) of the event's repercussions and a copy of the communications made to the insurance companies that cover the damages (to be stamped by them).

This report must be signed by a Legal Representative of the Contractor.

The Contractor must take corrective/ preventive actions as a result of the incident analysis as well as any other actions that could be recommended by EDPR.

#### 5.2.3 Change of classification

If, for any reason, the circumstances of an accident have been changed such that it would be classified differently (accident without days away from work, days away from work accident, severe or deadly accident, etc.), the Contractor shall immediately notify EDPR of this change, following the procedure.

indicated for such new classification. The timeframes will start counting as of the moment in which the circumstances favoring the new classification were changed.



#### 5.2.4 Injury and illness tracking

Before the 5th of each month the Contractor shall send to the EDPR Construction Manager the number of Contractor worked hours as well as the hours worked by every subcontractor at each EDPR worksite and the total number of "DAFW Accidents" and "non-DAFW Accidents" of the previous month, using EDPR's template available for such purpose (see section 8. Annex I). Failure to comply with this point will be considered as a minor infraction in the Disciplinary and Sanctioning Regime.

For the purpose of following up on accidents occurring within the sphere of EDPR's Contractor Companies, each Contractor shall send the (completed) form "Injury and Illness Status Notification Form" to the EDPR Construction Manager and the CSS, if any.

The information that must be filled out in the form includes the following:

| In-house personnel work hours: Hours worked by Contractor personnel at EDPR construction sites.

Hours worked by subcontracted personnel: Hours worked by subcontractor personnel at EDPR construction sites.

Number of safety inspections at the site/ works: Number of safety inspections conducted by the subcontractor of its workplace or of the workplace of its own subcontractors at EDPR construction sites.

| Days Away From Work Accidents: Number of Contractor and (its) subcontractor DAFW

accidents at EDPR construction sites.

| Non-Days Away From Work Accidents: Number of Contractor and (its) subcontractor Non-DAFW accidents at EDPR construction sites.

EDPR reserves the right to request at any time an official injury and illness certificate, issued by the Contractor Company.

#### 5.3 Cranes

With respect to the transiting of cranes, provided that their displacement is not carried out by means of heavy transport vehicles, in which case, section 5.7 would apply, the Contractor must prepare a Crane Transit Plan into the site, which must indicate the paths cranes must follow to move between the different work areas.

The purpose of this plan is to identify those points that present difficulties to the cranes, such as slopes, road width, turn radii as well as any other risk that could affect the safety of the operation, such as the presence of ditches, overhead power lines, culverts, etc.

The Crane Transit Plan must include a map showing the marked paths on which cranes will travel, as well as the necessary indications for the operator to drive safely.

In the event that the Crane Transit Plan 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 movement of the crane.



The Crane Transit Plan must be provided in writing to the EDPR Construction Manager/H&S Coordinator/web tool for review prior to the beginning of the works. Cranes may not move around the facility without the approval of said Plan.

The cranes should be properly stabilized before the beginning of any intervention. The platforms where the cranes are going to be put must be tested previously, to verify if they have the necessary resistance to hold the loads in which are going to be exposed. A crane can only be assembled after its correct stabilization.

Before the start of load loading, all the safety systems must be tested, those systems should be working perfectly.

After the crane stabilization, an inspection and a record should be made that all safety conditions are met for the crane to operate.

Sufficiently in advance before the start scheduled for the works, the Contractor will provide the EDPR Construction Manager/H&S Coordinator/web tool all the documents required by the country regulations applied to crane usage and the working procedure, the crane manual and the authorized wind speeds for each crane operation. In addition, the procedure must define the responsibilities of each role 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 a safety position.

When use of crane:

It is mandatory to dismount the boom

of the crane before each Crane transfer between platforms. Each mounting / dismounting of the boom have to be done accordingly to the lifting plans done.

It is mandatory to have a supervisor of the operation coordinating all related lifting operations. This supervisor mustn't be part of the work activities and shall only overview the global organization/ realization of the operation and act accordingly if needed.

| Each lifting area must be fenced with safety signs.

All lifting devices must be identified to allow the check of their last regulatory control.

#### 5.4 Chemical products

Prior to using chemical substances at the Construction site, the Contractor must send the list of chemical products (indicating trade name and usage description) to the EDPR Construction Manager/H&S Coordinator/Web tool along with their material safety data sheets (MSDS/FSIPQ).

The Contractor is obliged to:

Provide the necessary personal protective equipment and preventive measures to avoid environmental incidents for any job that implies the use of chemical products according to the H&S Plan;

| Provide updated copies of the hazardous material safety data sheets in local language for all chemicals available on site;

| Provide storage instructions for chemical products;



- Store chemical products according to the manufacturer's recommendations and existing regulations, using double jacket tanks or containment trays large enough to collect a potential spillage,
- | Supply adequate labels in all containers used to store chemical substances according to the existing regulations;
- Immediately remove any leak that could arise and notify the facility manager immediately of said incident;
- Keep the chemical storage area clean and clean the spill containment trays regularly.
- Take all the extra measures provide by the local regulations

All chemical substances present on site must have their material safety data sheets in paper or electronic format. In the latter case they must be accessible to any worker at the site at any time. The instructions described in the MSDS/FSIPQ must be followed in case of leak, ingestion, skin irritation or intoxication by inhalation.

#### 5.5 Tools, machinery and equipment

All machines, equipment and devices which are on the construction site must have all documents according to the applicable law. It is forbidden the use of machines, equipment and devices that don't comply with this requirement. It must comply:

1. Workers will only use the tools provided by the Contractor.

- 2. The tools must be of the characteristics and size appropriate to the operation being performed.
- 3. When a worker does not have the appropriate tool to carry out his/her work, he/she will immediately inform his/her direct manager.
- 4. Modifying the tools in any way or attaching anything/coupling to them is forbidden, unless they are specially designed for it.
- 5. Whenever the procedures to carry out certain operations indicate the use of a specific type of tool, no other tool will be used without conducting a relevant study that determines the correct suitability of its use.
- 6. The location of a tool should not imply risks to the safety of workers. Identify a single location (on each working area) for the storage of parts / tools. If possible, use a dedicated box for this purpose.
- 7. When transported in a vehicle, the cabinets, boxes or tool holders will be arranged in such a way that they do not hinder the safe driving of the vehicle, preventing also their possible shifting from posing an additional risk for the driver and other occupants of the vehicle.
- 8. Workers are responsible for the correct maintenance, cleanliness and proper handling of the tools assigned to them and are obliged to inform their direct supervisor of any anomalies observed in them.
- 9. The machines and equipment should be inspected periodically to ensure they are in good condition, in accordance with



a periodic inspection program and Local Legislation, in order to remove or repair those that are not suitable for safe use.

10. Hand tools in poor condition must be repaired or fixed, discarding those that cannot be repaired. Tools that have defects or deteriorations that make their safe use impossible will be replaced immediately by others that are in proper condition, and the former will be destroyed or removed from the worksite.

11. Only certified portable tools with their corresponding CE/INMETRO and equivalents for other geographies marking will be used.

#### 5.5.1 Documentation

The compulsory documents of machines, equipment and devices that can be used in the construction site are as follows:

- Instruction of usage/manual in local language
- | Technical documentation
- | Maintenance instructions
- | Maintenance records. Must be present on site.
- Declaration of conformity- CE sign (Machines and equipment bought after 1st of January 2003 in EU)/ INMETRO for Brazil and equivalent for other geographies.
- Declaration of accomplishment of the minimum requirements (Machines and equipment bought after 1st of January 2003) and equivalent for other geographies.

Records of the inspections, according to the manufacturer indications and/ or the regulations of the country.

#### 5.5.2 Hoist/cranes

All hoisting equipment should be certified with a maximum weight and maximum wind speed for operation and this should be clearly indicated on the equipment before taking it into use. This certification should include the structure calculation for maximum loads.

Be alert to prevent anyone from walking under suspended loads or being in the vicinity of lines holding a strain.

When doing rigging work in the vicinity of electric wires, ensure any necessary protection is in place.

Any work with cranes in the vicinity of live electrical installations (substations, HV/MV lines, etc.) can only be performed if it's ensured the stablished safety distances and the crane's safety devices active. If these conditions aren't met, the facility must be switched off.

When two workers are operating a hoist, they must keep their eyes on the person giving signals and the load, who must also keep their attention on the load. Misunderstandings and accidents can be avoided by using the standard signals. So, in order to avoid that, there should be only one person with the responsibility to give the signals and there should also exist a direct line communication between the operators and the worker who gives the signals.

Rope, cable, or any type of sling should



be protected with pads or blocks where it is taken around sharp edges.

When slinging pipe or any smooth-surfaces material, slings (bridle and chokers) should be placed around the object with at least two turns and fastened choker fashion.

Loads should not be handled by any equipment beyond the capacity and radius specified in the manufacturer's chart.

The operator of any crawler-type machine (which is working under load) shall see that the machine is working on firm ground or mats.

In uncoiling wire rope, it is important that no kinks be allowed to form. Once a kink is made, no amount of strain can take it out and the wire rope is unsafe.

Loads should not be applied to ropes, cables, or chains with a sudden jerk as the resulting stress will equal many times the weight to be lifted.

Defective chains, cables, or rope must be discarded immediately. Do not repair chains by bolting links or rings together.

Rope that has been contaminated with corrosive chemicals must be destroyed. Never weld or attempt to repair coil load chain.

Employees shall not ride or have their weight supported by any chain fall or hoist.

New or altered devices must be tested with a weight not to exceed 125% of the capacity rating (or other number as designated by the supplier). Please refer to the manual requirements.

The area beneath the hoist/crane must be fenced or taped off to direct personnel around the area. All equipment should be stored in proper manner after use to prevent accidental damages.

#### 5.5.3 Ladders

Ladders must be according to workload (kgs) and according to country regulations. It must comply:

To the extent possible, avoid working on a hand ladder in order to prevent falls from height. In any case, it is not advisable to use them for long-term work (more than 30 minutes approximately) and if the task requires physical effort or the handling of loads.

If a hand ladder is used, attention should be paid to three basic aspects: the ladder itself, its location and how to use it.

The use of a ladder as a workstation at height should be limited to the circumstances in which the use of other, more secure work equipment is not justified by the low level of risk and by the characteristics of the sites that the employer may be unable to modify.

The use of unapproved ladders is prohibited. It is advisable to use only hand ladders that meet the corresponding EN/UNE/ABNT and equivalents for other geographies standards.

| The ladders will offer the necessary guarantees of solidity, stability, and safety. Workers will not use those ladders that do not meet these requirements.



The condition of ladders will be periodically reviewed so that the more deficient ones may be removed. Because the ladder is a working equipment, it must have a periodic inspection accordingly with local law and it should exist a record of that inspection. If the ladder doesn't present the minimum acceptable, it should be repaired or replaced.

| Simple hand ladders will have a maximum length of 5 meters.

The use of the fall arrest equipment will be compulsory for work over 3.5 meters high, measured from the point of operation to the ground, and whenever the job requires efforts or movements that can endanger the worker's stability.

The ladder must be perfectly fastened and stabilized to the building or structure and rest correctly, in order to avoid any possible sliding.

On the inside or near live installations, only 100% isolated ladders should be used.

The register with the controls/checks performed on the ladders must be present on site. Each ladder must be identified.

#### 5.5.4 Scaffolds

The Scaffolds must follow the European standards for countries in Europe and those that apply to LATAM countries. Additionally:

The use of trestle scaffolds is forbidden, or any other kind that doesn't follow the regulation.

The scaffolding may only be substantially

assembled, disassembled or modified under the guidance of a competent person with specific or professional training qualifying him/her for such task, and by workers who have received adequate and specific training for the foreseen operations. The person directing these operations must inspect the scaffolding before it is put into service, periodically during its use and after any modification, period of non-use, exposure to the weather, or any other circumstance that could have affected its strength or stability.

These operations, unless the scaffolding is assembled according to a generally recognized type configuration, must be carried out following an assembly plan, which must establish, among others, the protective measures against falls at different levels during the assembly, use and disassembly phases.

In the case of scaffolds that have "CE" marking, this assembly plan can be replaced by the instructions of the manufacturer, supplier or vendor, and these operations may be overseen by a person who brings over two years' experience in this matter certified by the employer and with the corresponding safety training, at least for basic level functions. Said person must inspect the scaffolding before its commissioning, periodically during its use and after any modification, period of nonuse, exposure to the elements, or any other circumstance that could have affected its strength or stability. Because the scaffold is a work equipment, it should also be inspected periodically in accordance with the local legislation and by a qualified person. It should exist a record of the verifications.



#### 5.5.5 Electrical tools

Only portable electric tools with double insulation can be used, which must be connected to protected power sockets with a high sensitivity ( $\leq$ 30 mA) differential switch. Always disconnect the tool from the network when changing the tool and whenever it is not going to be used.

Portable hand tools must be class III whenever these tools are used in highly conductive construction work or sites, such as concrete work, inside boilers or metal pipes or similar.

Connecting tools to the network without using the appropriate connection element is forbidden. Check the condition of the connection pin and the power cable of the tool to be used. There should be no bare wires and no splices covered with electrical tape. Do not connect the cables directly. Do not carry the tools by holding them by the power cable. Do not disconnect the tools by pulling the cable.

When a differential switch is specifically associated with the power socket that is going to be used, check the correct functioning of said switch before each use by activating its test button; in other cases, ensure that the correct functioning of the general switch has been verified.

In the case of faulty tools or if deterioration in the power cord's insulation is observed, the operator will refrain from attempting to repair the tool on his own without the knowledge and authorization of his direct supervisor.

#### 5.5.6 Working at heights

Work at heights is every work performed at least 1 meter above ground/floor level.

If the work area is protected from all sides with the walls or any other fixed structure that protect employee from falling from heights is not consider as a working at height.

When working above 1 m it shall be installed barriers that reach minimum 1,1 m railing and protected bar in the middle that avoid fall from height (Collective Protection Equipment).

If barriers are no possible to install, there shall be dedicated other type of working at heigh protection. Preferably Collective Protection Equipment shall be applied and if no possible Personal Protection Equipment.

Work at heights must be always performed by minimum 2 workers.

Contractor is obliged to assure that all employees which are performing work at height are:

| equipped with adequate and certified PPEs or necessary CPEs are fixed in place;

| equipped and familiar with work manuals for the works:

properly trained for work at heights; in addition to the work at height GWO module, "First aid", "Fire protection" and "Load handling" GWO modules must be included. Apart from that, the contractor must take into account the specific mandatory certifications in each country.



In EDPR NA the contractor must provide certificates of training program equivalent to GWO training.

| subject of regular inspection of qualified employee (minimum once per week);

### 5.5.7 Worksite to support the construction

There should exist a worksite properly structured and organized, to support the construction, in accordance with the EDPR requirements. All the containers/assembled structures must have electricity, air conditioning and furniture suitable to the needs.

The electrical installation of the worksite must comply with local legislation and demand a liability statement (if necessary) by a legally certified technician.

There should also exist suitable fire extinguishing equipment and in sufficient number to the equipment installed in the worksite.

## 5.6 Amenities and refreshment rooms (restrooms, kitchen, and offices)

The contractor should provide amenities and refreshment rooms to personnel (own and contractors) and those should be kept clean and in order in compliance with the local regulation.

Social conditions in the rooms must be adequate to the needs (quantity of workers, weather conditions, etc.) and follow legal requirements of the country.

In case of supplying eating areas for the workers, there must be a lifevac system or similar in them to avoid suffocation due to choking.

#### 5.7 Vehicle traffic

The speed limit inside each construction site is 30 km/h, in normal weather conditions unless another sign is present. In adverse weather conditions, such as fog, frozen roads, snow or heavy rain, speed shall be reduced accordingly and conveniently.

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 its risk assessment and that of its subcontractors. If said conditions and their corresponding measures have not been included in the risk assessment, the EDPR Construction Manager or the H&S Coordinator 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. Construction sites that have special driving high slopes, areas where heavy snow is frequent, etc.) will require the use 4x4 off-road vehicles.

Any vehicle transiting through EDPR construction sites must be equipped with high visibility vests for the workers Additionally, if the legal regulations ask for it, any car transiting through the facility must carry a fire extinguisher.



In EDPR's construction sites, cars must be parked without obstructing the access roads, and access for emergency services must be guaranteed at all times. It is recommended to park cars in the designated area, facing the exit road so that they may evacuate the area quicker during an emergency.

Cars that are used for transportation of tools and/or materials must have a separate transportation area from the passengers/driver zone. Tools and materials transported in the car must be prevented from moving freely in the transportation zone.

With respect to the transiting of heavy vehicles or large vehicles, the Contractor must prepare a Heavy Vehicle Transit Plan into the site, which must indicate the paths vehicles must follow depending of the works that will be done.

To this end, the Contractor must access at site with a light vehicle (car, van, etc.) and drive on the path they will be driving on afterward with the heavy vehicle. The purpose of this plan is to identify those points that present difficulties to the heavy vehicle, such as slopes, road width, turn radii as well as any other risk that could affect the safety of the operation, such as the presence of ditches, overhead power lines, culverts, etc.

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 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 EDPR Construction Manager/H&S Coordinator/web tool for review prior to the beginning of the works. Heavy vehicles may not access the facility without the approval of said Plan.

#### 5.8 Visitors

Any person visiting a construction site must familiarize him/herself with the information available in the visitors' documentation package and wear the PPEs.

The EDPR Construction Manager must always be previously notified of any visit to the site. Visitors must be escorted by a responsible of the inviting company.

## 5.9 Personal and collective protective equipment

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.

If required by the nature of the works being performed, the use of Collective Protection Measures must be guaranteed. The use of Collective Protection Measures should prevail over the Individual ones.

In addition, it is reminded that the regulations require to opt for collective protective equipment



over personal protective equipment. As such, using working platforms should always be the preferred choice over rope access techniques unless it can be proved that a working platform cannot be used for the operation.

Prior to starting the assembly work and specifically for the assembly of wind turbines, the Contractor must prepare and deliver to EDPR a checklist of all available collective protection equipment. In this list, its status must be indicated to know its availability before starting the assembly work. The review of the state of the protection equipment must be carried out by a qualified contractor H&S technician. In the event that the malfunction of a protective equipment is detected, it must be fixed as soon as possible. While the equipment is not functional, it must be clearly indicated on site by placing a clear indication (label with red-Prohibited works, label with yellow-works allowed only using PPE and label with green-Works allowed) of the limitations of use and the use of mandatory personal protection.

Likewise, the turbine manufacturer shall provide the responsible for the company in charge of its assembly with a plan identifying the existing personal anchorage points on the wind turbine tower and this shall be distributed to all personnel of the companies involved in the assembly. In case the definitive anchor points are not operational, the manufacturer shall indicate the provisional anchor points. This information may be requested from the assembly supervisor (manufacturer or assembler)

Afterwards (and also before starting the works) the contractor must notify EDPR, and EDPR

must have the possibility of making its own inspection to the safety devices to verify them. Only with our inspection or with our indication that this turbine will not be inspected will it be possible to continue with the assembly work.

High risk works (e.g., performed on electrical installations, work at heights, hot works, confined space, with risk of entrapment between objects) performed in the facility must be carried out by a team consisting of at least two people in order to assure adequate safety.

#### 5.10 Emergency situations/ emergency response

The emergency plan, that anticipate/contain all possible emergencies situations that may occur, and operating procedure, to each kind of emergency incident must be followed up as specified in the H&S plan.

The Contractor must have an operational defibrillator at EDPR facilities, as well as personnel with adequate knowledge and training for its use according by country Law.

The Contractor is obliged to provide the necessary technical measures to respond to emergency situations (such as fire extinguishers, first aid kit, etc.) and ensure that its workers have continuous access to them (employee vehicles and work areas). In the event that any of these EDPR-owned devices are used, EPPR shall be immediately notified so that any supplies that may have been used/consumed can be replenished.

The contractor should be available on customer request to perform emergency drills.



# 6

# Environmental requirements at EDPR construction sites

#### 6.1 General rules

The works performed during the construction phase of a facility are carried out in a natural environment. Remaining and performing work in said locations carries potential risks to the environment.

The Contractor must act with respect for the Environment and take all the necessary measures to prevent any impact. In this regard, prior the beginning of the works, the Contractor shall provide to EDPR/Environmental Supervisor the assessment of the environmental risks of the specific contracted works that are going to be executed for EDPR and the corresponding preventive measures, including the work procedures which permit perform the activities under safe conditions for the environment.

Any environmental or relationship with local communities –related doubts arising during the provision of the services shall be consulted immediately with the Environmental Supervisor/Social Supervisor and/or the EDPR Construction Manager.

In addition to the specific rules indicated in this document, the Contractor shall strictly comply with all applicable regulations, with the requirements included in permits and authorizations and with the internal requirements and best practices established by EDPR, as well as to collaborate in the audits and/or inspections that EDPR may carry out in this regard.

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 their completion. The latter shall be considered to be complete once the workers have abandoned EDPR's worksites.

The Contractor shall inform EDPR, with enough anticipation, about activities such as opening roads, cutting, pruning, restoration, etc., to proceed to communicate it to the competent body or contact persons from local communities and/or request the corresponding authorizations and to proceed with the coordination of the social accompaniment, as applicable.

The Contractor must provide information on their environmental performance (waste generation and treatment, reused materials, vegetation affected and restored, water consumption, fuel consumption, environmental incidents, environmental complaints, etc.) whenever required by EDPR to demonstrate compliance with the requirements included in this guide.

Prior to the completion of the works,
EDPR will carry out a final environmental
inspection with the purpose of evaluating the
compliance with the applicable environmental
requirements included in the contract scope.
The conclusions arising after the assessment
of the mentioned requirements will allow to
conclude the acceptance or rejection of the
works regarding environmental matters.

The findings and conclusions included in the report resulting from this final environmental inspection of construction works will be considered by the Construction Manager in the Take Over Certificate (TOC) signing.

#### 6.2 Housekeeping

The Contractor shall execute and/or provide the contracted works/services in a manner that they ensure a proper housekeeping of the worksite and its surroundings. Once finished, the area shall remain in the same conditions as before starting the work.

### 6.3 Environment-friendly products and services

The Contractor shall carry out the contracted works with the maximum respect for the environment. Therefore, the use of environmentfriendly products/materials/equipment such as non-toxic, biodegradable, renewable products/materials, products with high proportion of recycled materials (for example, ecological mortar from recycled blades, recycled concrete for particular uses, etc.) and/ or with high recyclability potential at the end of its life, green certified products, recycled water for periodic irrigations, biodegradable oil for concrete formwork release, packaging/ containers with refilling system to reduce packaging/containers waste generation, electric vehicles, etc. will be highly valued.

#### 6.4 Waste management

Prior the beginning of the works, the Contractor shall provide to EDPR/Environmental Supervisor a Waste Management Plan. This Plan shall include, at least, information about the type of wastes expected to be generated, amount estimations, procedures for waste handling, detailed instructions for the subcontractors and workers on how to separate and store the waste at the construction site, as well as all the



documentation that evidences the authorization of the waste haulers/handlers and the final treatments to be applied to the different wastes.

With the periodicity established by EDPR, the Contractor shall report to the Environmental Supervisor, real and proven data about the amounts of waste generated by type, its final destination, materials reused and any other information of interest.

All waste generated, 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.

The Contractor, as producer and holder of the waste generated in the development of its activity shall ensure the proper collection, storage and management of waste, according to the applicable legislation in force.

The temporary storage of waste until it is delivered to an authorized handler shall be carried out in an area conditioned for that purpose and clearly indicating the presence of waste and complying with the applicable regulations.

The Contractor shall comply with the following requirements regarding waste storage:

- | Make a proper use of the waste storage and its elements, ensuring good housekeeping both in the waste storage itself and its surroundings.
- | The waste storage shall be carried out in an area:
- Preferably close to the location of the construction site office and amenities building,

- Away from surface waters, groundwaters and natural areas,
- Paved/waterproof and/or using appropriate containment basins.

The waste storage is only intended for the temporary storage of waste; therefore, it cannot be used for storing any other element.

In the event of generating waste that cannot be stored at the clean point for a justified reason (volume, etc.), it must be disposed of in an appropriate place and previously approved by the corresponding authorities.

The maximum hazardous and non-hazardous waste storage period established in the legislation in force shall be accomplished. If there is no legal requirement in this regard, it is recommended not to exceed 6 months for hazardous waste and one year for non-hazardous waste.

Debris derived from the works shall be removed to an authorized installation, avoiding the accumulation in the worksite.

Waste shall be stored duly segregated in containers with a lid (disposed on retention trays if susceptible of producing a spill), located in a closed or covered area (if outdoors), arranged and placed according to their compatibility, so as to avoid heat generation, explosion, ignition or generation of toxic substances or any effect that may increase the hazard or hinder their subsequent management.

All waste containers temporarily stored until their delivery to the waste handler shall be properly labelled in a clear, legible and



indelible way. The labels must be firmly fixed on the container, removing or covering any signs or labels that could be misleading or confusing. Labels will include at least the information required by the legislation in force.

| Ensure that human food waste is not used to feed domestic or wild animals.

The removal of waste shall be done safely, in suitable containers for each type of waste, to avoid any accidental spill during its transportation.

| Fire extinguishers must be available near the waste storage point.

All personnel involved in packaging, loading, unloading, storage, handling, proper disposal of waste, decontamination and cleaning for the handling of dangerous goods must be trained to ensure compliance with the requirements in this area.

The burning or burial of any type of waste generated is prohibited.

Regulation relative to transportation of dangerous goods as ADR regulation or others applicable at local level shall be fulfilled.

Waste transportation shall be performed by authorized entities using appropriate and properly marked means for that purpose. The waste movements between the different points of the worksite shall be carried out in safe conditions to avoid accidental spills, using the internal roads, avoiding driving on other routes.

If applicable, the driver of the vehicle that

transports dangerous goods must have the compulsory basic training course for drivers that transport dangerous goods, carry the certificate of attendance to the same, in which it is certified that he performed satisfactorily in the content of the program and deliver it to the Environmental Supervisor.

In case of transportation of fuels, the contractor must have a contingency plan for the transportation of hydrocarbons or harmful substances. If applicable by local regulations, this plan must be approved by the environmental authority with jurisdiction in the area where the cargo leaves, as well as having the Cargo Manifest and the national registry for the transport of dangerous goods.

| Spills shall be collected using absorbent material and shall be prevented using appropriate containment basins, where all waste shall be placed. For this reason, a spill collection kit made up of specific materials must be available for the collection/absorption of substances that could potentially spill (for example, hydrocarbons). The contaminated absorbent shall be collected and managed as a hazardous waste. Contractors must carry adequate means in situ to act efficiently in case of accidental spills.

The waste of masks and gloves, used by construction personnel to prevent the spread of diseases, must be separated in a double black bag. Once the bag reaches its capacity, it is disinfected and permanently sealed until it is delivered for disposal as ordinary waste. This waste must be separated from the other waste generated and must be disposed of as soon as possible. People who handle



these bags must have the required personal protection elements. If it is presumed that there is a positive case of contagious disease, this waste must be managed as hazardous waste.

In case of generating waste of used cooking oil, the contractor must register with the environmental authority and make the respective report (if applicable taking into account local regulations). In addition, the oil will be collected in duly sealed plastic containers to deliver to the manager.

Deliver the waste to authorized managers.

Waste shall be managed guaranteeing the application of the hierarchy principle that prioritizes prevention, preparation for reuse, recycling or other forms of recovery, including energy recovery, being the disposal just an option when none of the previous treatments are technical and/or economically viable previously agreed with EDPR.

As far as possible, the Contractor must benefit from the post-consumer collection programs for waste batteries, batteries, tires, light bulbs or waste electrical and electronic equipment.

#### 6.5 Wildlife and vegetation

The Contractor shall execute and/or provide the contracted works/services with the maximum respect for the environment taking all the necessary measures to prevent any impact on vegetation and wildlife. For that purpose, the Contractor is committed to act according to the following requirements:

| Wildlife or vegetation sensitive areas and

protected habitats shall not be affected.

Therefore, occupying them is prohibited. These areas shall be fenced and properly signalized and the workers shall take all precautionary measures when working in its surroundings. Areas to be protected and the type of fences to be used should be clearly stated in the description of the works and periodically checked.

Vehicles and machinery shall circulate only on designated areas always respecting the established speed limit to avoid accidents with wildlife.

| Wildlife entrapment effects shall be minimized by filling and closing ditches and foundations as soon as possible.

| The Contractor shall immediately notify (sending pictures, if possible) the Environmental Supervisor and/or EDPR Construction Manager in case of finding any trapped, injured or dead animal or abandoned animal remains (carrion).

| Works susceptible to disturb or affect wildlife shall be properly programmed to be conducted off the breeding/nesting season.

The Contractor shall consider the requirements regarding the establishment of protection measures for birds in transmission lines and meteorological towers and provide the Client with the guarantee' certificates of the protection devices and its maintenance specifications, after its installation.

When working in critical areas or during critical periods in terms of risk of fire, as determined by local regulations, the Contractor shall have appropriate preventive means (additional fire



extinguish equipment, etc.) and shall comply with all preventive measures determined by regulations and/or by EDPR. Immediate stop of work may be required in specific cases.

When vegetation clearings are required, the Contractor shall comply with the applicable requirements of the corresponding authorization and HSE requirements for clearing, felling and pruning activities (Annex II)

The Contractor in charge of the morphological and plant restoration work must provide the EDPR Construction Manager and the Environmental Supervisor with information regarding the morphological and plant affected area (detailed by affected species and protection status, if any), the morphologically restored and replanted area, as well as the number and species planted and/or transplanted.

#### 6.6 Watercourses and waterbodies

The Contractor shall execute and/or provide the contracted works/services with the maximum respect for the environment taking all the necessary measures to prevent any impact on watercourses and waterbodies. For that purpose, the Contractor is committed to act according to the following requirements:

| Water used at the worksite shall come from an authorized source. Any water withdrawal requires an authorization from the corresponding body and all applicable requirements shall be fulfilled. Therefore, the Contractor may not collect water without the express approval of EDPR.

| The Contractor shall provide information regarding water consumption and its source of origin to the EDPR Construction Manager and the Environment Supervisor. Also, it must be provided the documentation that proves compliance with current regulations (water concession permit and/or environmental license that explicitly indicates the authorization for domestic or industrial use, as appropriate, purchase invoice and general certificate from the supplier listing the volumes and the associated permission).

Prior to the start of the works, the machinery parking areas and other areas destined for similar purposes, such as stockpiling of materials and other auxiliary services, shall be located in flat terrain and away from streams to prevent runoff from dragging the accumulated materials into the riverbed considering the zoning established for each project. These areas shall be appropriately marked.

The abandonment, dumping or discharge of waste or wastewater considered toxic and/or hazardous, or others that may cause affection to aquifers by infiltration, is prohibited. This waste/wastewater shall be managed by authorized companies as established in sections 6.3 and 6.5. In case of spill, the guidelines stated in section 6.11 shall be followed.

Sanitary facilities at the worksite will be those contemplated in accordance with what is authorized by the license and/or environmental permit of each project. For no reason may it be discharged into the water or onto the ground without the explicit permission of the competent environmental authority. So, they shall have an adequate evacuation of the wastewater by watertight tanks and its subsequent



discharge to the general sanitation network (with prior authorization) or to a wastewater treatment plant. The Contractor shall provide to the Environmental Supervisor, evidences of the proper management of the wastewater generated during the construction works.

Water that may be retained soil excavations shall be evacuated. If there is an ecological sensitivity or risk of polluted water, the water shall be pumped in a truck container and taken to a dedicated area to be properly treated. In case of water just in contact with the soil, without ecological sensitivity on and around construction site, the water shall be pumped and released directly on the ground, far enough from the excavation and in a place where it does not pose any problem.

Maintenance tasks and refueling operations of equipment and mobile machinery shall be performed in appropriate facilities for this purpose, outside the worksite. The maintenance of those equipment that, due to their nature, cannot be performed in suitable facilities, shall be carried out in an impermeable area far from surface waters, groundwaters and natural areas, taking all the necessary measures to prevent spills and ensuring the proper management of the waste generated.

Washing vehicles, machinery and working tools shall be performed in appropriate facilities for this purpose, outside the worksite. The cleaning of those equipment that, due to their nature, cannot be performed in suitable facilities, shall be carried out in an impermeable area far from surface waters, groundwaters and natural areas, taking all the necessary measures to prevent spills and ensuring the proper management of the waste and effluents generated.

The washing of vehicles, machinery and work tools in watercourses is strictly prohibited.

| Extreme caution shall be exercised when working near water streams to ensure that its hydraulic capacity and quality remains unaltered.

Protect all water sources to prevent them from becoming contaminated, in construction processes, through the use of good engineering practices. Construction works shall never impede the drainage capacity of the streams, decrease the flow or affect the quality of the water.

An adequate drainage network shall be designed and built-in accordance with what is authorized in the license and/or environmental permits of each project. Drainage systems shall be maintained in proper conditions, always free of waste that may obstruct the flow of water.

Verify the requirements established in the corresponding riverbed occupation permit, for those cases in which the execution of civil works is required in the watercourses (rivers, streams, dry pipes, etc.). The contractor must execute the works in accordance with the approval of the environmental authority.

Roads shall be avoided in the vicinity of streams and gullies. Only the roads approved in the license and/or environmental permit of each project will be built.

The servitude zones established in the legislation shall be always respected, keeping them permanently free.

The works shall be executed guaranteeing



that the possible retention of water produced by the ford does not affect the lands adjacent to the riverbed (except in the case of Colombia where this is not allowed by current legislation).

Works that may result in a modification of the course of streams or alter the cross section of riverbeds, shall not be undertaken.

Streams crossings shall have the corresponding authorization and all applicable requirements shall be fulfilled. The crossing shall be clearly identified by placing visible milestones on both sides of the riverbed.

Drainage network and access infrastructures shall be properly restored after construction works.

Any operation using concrete shall be carried out under conditions that prevent spillages, especially in case of works near water courses.

| If applicable, the contractor must carry out monitoring and follow-up of both surface water, wastewater and consumption; in accordance with the provisions of the Management Plan / Environmental Surveillance of each project.

The concrete wash water coming from the cleaning of vats and gutters of the concrete mixer trucks shall be sent to the concrete plant. If not possible due to the distance to the concrete plant, it shall be performed in specific areas (holes on the ground):

- located in suitable places far from surface waters, groundwaters and natural areas,
- · coated with geotextile blankets,
- properly signalized and fenced starting from the ground to avoid fauna accidents,

- properly used and maintained, preventing overflow to the surroundings,
- that shall be recovered once its use is finished.

#### 6.7 Air pollution and noise

The Contractor shall execute and/or provide the contracted works/services with the maximum respect for the environment and the local communities, taking all the necessary measures to prevent air pollution and noise generation. For that purpose, the Contractor is committed to act according to the following requirements:

Vehicles and machinery shall be up to date with regulatory inspections and noise levels shall be controlled to ensure compliance with the applicable regulations. Regarding this, the current mechanical and gas technical review certificates for all vehicles that apply in accordance with current regulations must be provided to the EDPR Environmental Supervisor. Also, will be necessary provide a list of the vehicles used.

| Carry out the monitoring of air quality and noise defined in the management plan / environmental surveillance plan of each project in case this responsibility falls on the contractor. The results must be provided to EDPR Environmental Supervisor.

| Movement of vehicles and/or machinery shall be limited to the strictly necessary to perform the works, always respecting the maximum speed of 30 km/h (it can be reduced during dry season to limit dust propagation).

| Machinery for the execution of the works shall be selected taking into account noise



emissions as a criterion. The so-called 'silent' machines shall be preferably selected, as they guarantee acceptable maximum noise levels according to the EU directives and current legislation in LATAM countries.

Noisy activities shall be adequately scheduled to avoid disturbances to inhabitants or fauna.

The use of explosives shall be scheduled well in advance to request the corresponding permits and to take all necessary measures to avoid material projection and to minimize the noise and effects of vibrations. Prior to the execution of these activities, the neighboring communities must be informed of the applicable management measures and protocols.

- | To avoid dust generation, the following considerations shall be implemented:
- Respect the maximum speed limits.
- When necessary, apply periodic irrigations (preferably using recycled water) on roads and paths.
- Protect stockpiles and cover the material to be transported.
- Reduce the pouring height of machines during earthworks.
- If necessary, wash the wheels of the trucks at the exit of the construction site.
- Use of especially effective construction materials to reduce dust emissions (for example, Bischofita in Chile if available).

The refrigeration systems used by the Contractor may not contain prohibited substances that deplete the ozone layer according to current regulations (for example: Chlorofluorocarbons – R-11, Hydrochlorofluorocarbons – HCFC R-22).

To the extent possible, the Contractor shall deliver to the EDPR Construction Manager and the Environmental Supervisor information regarding the consumption and type of fuel associated with heavy machinery, other vehicles (or distance traveled) and auxiliary equipment (for example, generators), for the purpose of calculating the associated CO2 emissions.

#### 6.8 Soils

The Contractor shall execute and/or provide the contracted works/services with the maximum respect for the environment taking all the necessary measures to prevent soil impacts. For that purpose, the Contractor is committed to act according to the following requirements:

Vehicles and machinery shall circulate only on designated areas approved in the license and/or environmental permits.

The occupation of land shall be minimized to the strictly necessary for the works execution, delimiting each area with visible elements.

The construction of new roads or paths shall be avoided, taking full advantage of existing ones.

Once works are completed, roads shall keep to the minimum width that allows their use, restoring those that are not going to be used during operation phase, in accordance with the provisions of the environmental license and/or permits applicable to each project.

| Earthworks shall be minimized to those strictly necessary for the works execution, respecting as much as possible the natural profile of the land.



| Special attention shall be paid to areas with soils of high natural value (for example, peatlands), that shall be fenced and signalized and all the necessary measures to prevent any impact shall be taken.

The workers shall take all preventive measures when performing operations likely to produce a spill and affect the ground. In the event of accidental spills, the guidelines stated in section 6.12 shall be followed. Contractors must have proven training and adequate means to act efficiently in case of accidental spills.

The materials to be used for the construction works shall come from legally authorized quarries or from authorized facilities for the valorization of construction and demolition waste. The contractor must prove the legality by delivering to EDPR the necessary documentation based on the current legislation of each geography.

The contractor must demonstrate the lawful origin of the materials when the use of stone, wood or fuel material is required. When EDPR requests it, the purchase invoice must be presented in a legally constituted establishment.

Waste from excavations shall be reused, for example, in the filling of roads and embankments. If there is any left over, it shall be taken to an authorized center. In case of any legal/permit requirement in this regard, it shall be fully accomplished. The Contractor shall provide information regarding the amount of materials reused to the EDPR Construction Manager and the Environment Supervisor.

At the end of the works, the compacted soils (due to the passage of machinery, stockpiling of

materials, etc.) shall be prepared for restoration following the criteria established in the restoration plans or projects approved during the obtaining of the environmental authorization. This preparatory phase of the land is called morphological restoration and is essential to be able to subsequently undertake plant restoration.

Regarding topsoil withdrawal and management, the following considerations shall be implemented:

- Selectively withdraw the topsoil, treating separately the layer containing organic matter and nutritional elements.
- Store topsoil separately and free of stones and vegetal remains such as branches.
- Ensure that topsoil stockpile height does not exceed 2 m and avoid the passage of machinery over them.
- Uniformly distribute the topsoil (a layer of about 15–30 cm) over the degraded areas where the seeding will take place.

#### 6.9 Landscape

The Contractor shall execute and/or provide the contracted works/services with the maximum respect for the environment taking all the necessary measures to avoid visual impact. For that purpose, the Contractor is committed to act according to the following requirements:

The morphology and slopes of the altered surfaces shall be adapted to the original terrain. The formation of edges and rectilinear forms that contrast with the natural relief shall be avoided.

The materials shall be selected considering the traditional architecture of the area, avoiding creating a strong contrast with



the color ranges of the natural terrain, and avoiding the use of concrete.

Always possible, transmission lines shall be buried, and the ditches shall be restored in the shortest time possible.

Once works have finished, the temporary structures/elements, auxiliary installations and equipment, concrete remains as well as waste (pallets, plastic, cans, cables, boxes, scrap metal, etc.) shall be removed, returning the site to the state it was at the beginning of the works.

| The Contractor in charge of the morphological and plant restoration work must provide to the EDPR Construction Manager and the Environmental Supervisor with information regarding the morphological and plant affected area (detailed by affected species and protection status, if any), the morphologically restored and replanted area, as well as the number and species planted and/or transplanted.

#### 6.10 Local communities

The Contractor shall execute and/or provide the contracted works/services with the maximum respect to the local communities taking all the necessary measures to avoid disturbances. For that purpose, the Contractor is committed to act according to the following requirements:

The land use shall be maintained and the access to properties and free movement of vehicles shall be guaranteed.

The movement of vehicles and/or machinery shall be limited to the strictly necessary to perform the works, respecting

the maximum speed of 30 km/h.

| The machinery for the execution of the works shall be selected taking into account noise emissions as a criterion.

Noisy activities to be performed close to inhabited areas shall be scheduled during the most appropriate periods to avoid annoyances.

Livestock trails existing in the vicinity of the worksite shall remain free and accessible, with no wire fencing, waste, manholes, ancillary installations or any type of construction, maintaining their width as well as their existing boundaries that shall be respected at all times in order to not impede cattle transit nor any of the rest of its uses.

Under any circumstances, do not leave any trash or uncontrolled garbage, nor permanent or temporarily, in places not designated for this purpose.

Any situation that may affect local communities shall be immediately notified to the Client.

#### 6.11 Indigenous communities

The Contractor shall execute and/or provide the contracted works/services with the utmost respect for the indigenous communities, taking all necessary measures to avoid any disturbance. To this end, the Contractor undertakes to act in accordance with the following requirements:

| Prior to the start of works, socialization must be carried out with the communities in the area of influence and territorial entities, on the activities and management



measures to be applied in each project.

If applicable and prior to the intervention, the contractor must carry out the collection of neighborhood records in all the places where intervention is required, with the due film and photographic record. This activity must be carried out with the owner and/or authority of each community or a member designated by it and with members of EDPR's social and technical team. A document signed by the parties must be included as evidence. The Contractor shall ensure that a representative of each of the suppliers that will execute the Services is present at the initial meetings with the leaders and traditional authority of the communities.

To provide and execute the Services in compliance with the socio-cultural obligations contained, in the Environmental License and related documents (Environmental Management Plans and Programs, Social Management Plan, General Guidelines for the Contractor, protocolized agreements in the prior consultation process that are within its competence, Manual of Attention to requests, complaints, claims, suggestions and congratulations and Manual of Intercultural Relations in Colombia).

To comply with the talks or training indicated in the Environmental Management Plan, both for communities and for workers and/or subcontractors. Therefore, the Contractor must ensure that all persons who will perform the Services are well informed about local customs and practices and understand the need to display cultural sensitivity.

To develop activities with respect for the uses and customs of local communities and

apply what is contained in the intercultural relationship manual that applies according to the project. Identify and use local protocols regarding the permission required to enter a community and access its indigenous territory.

| To maintain a respectful approach, so that relationships can be built and trust maintained.

| To respect local times and rhythms, interfering as little as possible in the socio-cultural and economic activities that the communities develop.

To give priority to hiring labor from the communities in the area of influence and must submit to EDPR a detailed monthly report with labor hiring indicators. The Contractor must establish legal and formal agreements for the acquisition of local goods and services for the development of its activities and comply with the commitments made.

| To inform the communities well in advance of road closures and movement of machinery and/or heavy equipment along main roads and/or population centers.

| To leave the intervened area in the same conditions as those found by applying the restoration measures established in the Environmental Management Plan and / or Licenses.

To have a mechanism for dealing with petitions, complaints and claims aligned with the Environmental Management Plan.
All effects generated by the Contractor, its workers or subcontractors must be assumed and addressed in the shortest possible



time, contemplating what is established in the Environmental Management Plan.

To submit to EDPR reports on the requests, complaints and claims received.

To be liable for any damage generated to the communities that could be caused by the development of its activities, suppliers, subcontractors and/or employees.

If applicable, the Contractor must obtain and deliver to EDPR evidence of the peace and clear of the agreed commitments or compliance with environmental measures, which are executed with the communities, environmental authority or owners.

#### 6.12 Cultural & archaeological assets

The Contractor shall execute and/or provide the contracted works/services with the maximum respect for the cultural and archaeological sites taking all the necessary measures to prevent any damage. For that purpose, the Contractor is committed to act according to the following requirements:

When required, an archaeologist shall be present during earthworks to verify the non-existence of cultural/archaeological remains that may be affected. For this, the contractor must inform EDPR sufficiently in advance of the start of the excavation activities in order to schedule the accompaniment by the archeology professional.

In case any cultural/archaeological remains appear being the archaeologist not present, works shall be stopped and the Contractor shall immediately inform the Client in order

to notify it to the archaeologist to assess the real existence of a cultural/archaeological finding and establish the corresponding measures before continuing with the works.

All cultural/archaeological assets in the area of influence of the project shall be fenced and properly signalized. Workers shall take the corresponding precautionary measures when working in its surroundings to avoid its deterioration or damage.

#### 6.13 Environmental nearmisses and accidents

#### 6.13.1 Definitions

For the purpose of this document, the following shall be understood:

EDPR: all companies of the EDP Renováveis Group.

EDPR facilities: facilities owned by EDPR and/or managed by EDPR.

Contractor Company: a physical or legal person who maintains a contractual business relation with EDPR.

Environmental Accident: any environmental damage occurred on the occasion of or as a result of work performed for EDPR by the Contractor Company as part of the contractual relationship with EDPR.

Environmental Accidents taking place at the Contractor's worksite are excluded from this document.



Environmental Near-miss: a spontaneous unforeseen event that originates from the activity being performed by a Contractor Company that does not cause damage or a deterioration to the environment, but which hinders the normal operation of the works and can also be the cause of future environmental accidents.

Environmental Near-misses taking place in the Contractor's worksite are excluded from this document.

#### 6.13.2 Environmental damage prevention

The Contractor shall execute and/or provide the contracted works/services with the maximum respect for the environment taking all the necessary measures to prevent pollution and environmental damage. For that purpose, the Contractor is committed to act according to the following requirements:

It is prohibited to light fires on the ground.

Do not abandon or deposit combustible materials from clearings in the worksite.

| Hazardous materials shall be stored in a covered area with adequately sized retention tank (sized to the maximum volume that can be spilled) or in a double-walled tank.

When executing works susceptible of causing a fire or a spill, procedures to reduce the risk shall be established and all safety measures to that end shall be adopted.

| Spill kits shall be available at the base camp and also in all mobile equipment at the work site.

Refueling operations are activities with high risk of spill and consequently, with impact on the environment. To prevent this potential environmental damage, the Contractor shall ensure that fuel is managed according to the requirements established in section 5.4 Chemical products. Fuel shall be stored in a suitable container with a retention tank large enough to collect a potential spillage. A spill kit and a fire extinguisher shall be located near the fuel tank. During refueling operations, the flexible/mobile retention shall be located beneath the connection point of the fuel tank and the refueled machinery to avoid leaks from the connection points.

In case of environmental accident, the Contractor shall immediately act to minimize the damages and shall notify the Client.

The Contractor will be responsible for and must notify the EDPR Construction Manager and the Environmental Supervisor of any damage caused to the environment and/or EDPR as well as any fine, penalty, sentence, litigation or complaint that may arise due to any non-compliance with its obligations as far as the environment is concerned.

## 6.13.3 Environmental emergency response

The operating procedure in case of emergency situations is provided in the H&S Plan.

The contractor must at least adhere to the guidelines provided by EDPR. In any case, it must have an Emergency Preparedness and Response Plan1 that incorporates the proper management of environmental emergencies.

The Contractor is obliged to take part in the drills that may be conducted at the



site. If necessary, the Contractor must also have its own programming.

If the emergency situation has consequences on the environment, the Contractor shall act immediately to minimize the environmental damage (using absorbent materials to contain spills, removing potential sources of heat or ignition to reduce fire risk, etc.) always ensuring the safety and health of people beforehand and notify EDPR within 12 hours.

In case of fire, once it has been extinguished and the safety of people is guaranteed, the waste generated shall be removed, both hazardous and non-hazardous, and managed properly.

In case of spill, absorbents shall be used for its containment. Once contained, try to identify the source of the problem and take the necessary steps to stop or control it.

Once stopped or controlled, the spilled substance must be collected using a pump or absorbent material, properly removing any generated waste using labeled containers according to the applicable legal requirements and managing it as such.

Special attention will be given in case of suspicion or evidence that the spill has reached the ground. The Contractor shall ensure that all necessary measures are taken (soil analysis certified by an independent laboratory, removal and treatment of contaminated soil prevailing recycling over disposal, etc.) to ensure that the soil is free of contamination.

Any trace left by the spilled substance should be cleaned as soon as possible.

Should the Contractor fail to comply with the aforementioned in a reasonable timeframe, EDPR will proceed to undertake the necessary measures (removal and management of contaminated land, conducting soil analyses, cleaning of oil traces, etc.) and charge the corresponding cost to the Contractor.

1. Articulated with the Risk Management Plan, approved in the environmental license of each project, when applicable.

# 6.13.4 Environmental near miss and accident reporting at EDPR construction sites

In the event of an environmental near miss or accident, the Contractor, once the works are stopped and/or the area is isolated to prevent its consequences from repeating or extending, shall notify the event immediately (by telephone, verbally, e-mail, etc.) to the EDPR Construction manager/Environmental Supervisor.

Next, the Contractor shall send to the Environmental supervisor 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 affected and the measures taken and to be taken and any other information that may be relevant in order to gather as many details as possible of what has happened.

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



cause and the establishment of the measures to be taken to avoid it 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.

The Contractor must take all preventive measures to prevent environmental incidents from happening and all corrective actions as a result of the incident analysis as well as any other actions that could be recommended by EDPR to guarantee that the site is restored to its original condition.



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# Change control

Edition	Date	Description of the main modifications
04	June 2024	<ul> <li>New high risk work (LMRA)</li> <li>Clarification of General H&amp;S rules (5.1)</li> <li>Clarification of Near miss and accident reporting at EDPR construction sites (5.2.1)</li> <li>Inclusion of HSE requirements for clearing, felling and pruning activities (Annex II)</li> </ul>



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## **Annexes**

#### Annex I: Injury and illness status notification form

Monthly contractor data Facilities:

	Worked hours	N° of accidents		
Contractors (O&M / E&C)	Technical and support activities. Logistics, administrative and during mission travel time.	With sick Leave (in the current month)	Without sick Leave (in the current month)	N° Lost days (in the current month)
Contractor: #name				
Subcontractor 1: #name				
Subcontractor 2: #name				
Subcontractor n:				
Total	0	0	0	0



## Annex II: HSE requirements for clearing, felling and pruning activities

#### Introduction

In EDPR projects, clearing, felling and/or pruning work is sometimes necessary to remove vegetation from the areas where it is required.

When this work is necessary, the Contractor:

| Must request the pertinent authorization/ permit if it is entitled to do so.

| Must comply with the applicable regulations on HSE matters, the environmental permit or license for the project, any administrative act that authorizes forest use (including the partial lifting of the ban on epiphytic flora) and pruning, and/or any EDPR additional requirement that might be properly communicated. Special attention will be paid to rules governing the applicable restrictions and measures in areas and periods of high fire risk.

Will comply with and enforce the prohibition of any felling, pruning, clearing, shredding or other tasks that affect the vegetation, as long as there is no express authorization from the competent environmental authority.

| Minimize the impact on natural elements following the guidelines in the corresponding environmental permit, as well as the regulations governing the natural area in question.

| Will hire specialized personnel with experience in carrying out these tasks. The personnel must have a specific training:

- In the mastery of tree felling techniques
- In pruning techniques

| Will ensure the follow-up of the necessary measures that guarantee the safety and health of the workers during the performance of vegetation removal tasks.

#### **Definitions**

Felling: cutting down operations of trees or tree masses whose definition is such that it implies that felling must be carried out from the base.

Clearing: cleaning works in which there is only undergrowth, scrub, bushes, or, in the case of trees, their height does not exceed 3 meters.

Pruning: removal of those branches of trees that can generate a negative effect such as, for example, impairing the continuity of the electrical service by not respecting the minimum safety distances.

| Forest clearance includes in general removal of trees, stumps and other debris, chipping and spreading.

#### **Execution of the works**

Aspects to consider before executing the works

| Carry out a visit an delimit and validate the project by the competent technician.

Carry out a survey of the area prior to carrying out the work by the competent technician in order to identify species requiring intervention, the quality of the land, the topography, the density of the tree and in general, the ecology of the site, such as the presence of hornet or wasps, as these aspects determine the quality and variety of the shafts that trees



develop and affect the direction of tree fall, as well as the precautions to be considered.

This prior reconnaissance work must include verification of the presence of vascular epiphytes so that they are managed in accordance with the measures required by the competent environmental authority.

- Verify the inventory and adequately mark:
- vegetation requiring intervention in order to guarantee that it is the minimum essential and that it complies with the provisions set out in the relevant authorizations.
- or sensitive vegetation that must be protected to prevent it from being damaged during the work.
- And manage invasive species known in the area to avoid spreading.

#### See:

In areas of ecosystem importance or when speciments or formations of protected areas can be affected, follow environmental surveillance or ecological expert precautions.

Carry out a kick-off meeting with the involved part to ensure roles and tasks of each and to share latest updates and clarify doubts.

Coordinate with EDPR the tasks of informing owners and local communities prior to carrying out the works.

| Ensure a plan for the proper management of waste and the prioritization of its recycling / recovery.

| Identify the direction of tree fall, considering the natural direction of fall (according to the slope of the ground, inclination of the shaft, distribution of branches and buttress or plank roots at the base), the direction of the wind, the existence of nearby trees, the expected direction of selected felling and possible obstacles in the drop zone.

Proceed to delimit the work area and the area of influence (at least twice the height of the felled tree or up to four times in areas of dense vegetation or reduced visibility) are signposted appropriately; the area must be cleared of personnel and tools, including auxiliary accessways, areas for the collection of plant remains and areas with the presence of vegetation of interest.

Determine the path through which the chainsaw operator and his helper will escape from the physical threat resulting from the falling tree (identification of escape routes). The escape route guarantees the safety of the people who are carrying out the felling work, who must move to a safe place the moment the tree begins its fall, at a prudent distance.

In strong wind conditions and in the case of trees with large crowns consider that the wind can tilt the tree in the direction of its fall and may pose a risk to people; therefore, it is advisable to reschedule those tasks.

If the felled specimen has creepers or lianas, these must be eliminated by means of a preventive and safe procedure, since they hinder directing the fall of the felled tree and increase the risk of accidents to workers.

In case of excessive proximity to live power lines, contact the power line utility and agree on the execution process (conductor isolation or disconnection).



Aspects to consider during the execution of the works

#### General aspects

- Restrict tasks to zones and volumes authorized in the applicable environmental license and/or permits.
- Open up the least possible number of new access ways, therefore minimizing affection to plant formations and specimens of interest along their layout or disposition. If necessary, the opening of new access routes must always be confirmed by the EDPR team.
- | Signal areas with potential risks of accident.
- There must always be present at site: spill kit, basins for small fuel deposits, combat fire kit (including water and powder extinguishers, fire beater, shovel, hoe in high-risk period or areas).
- Keep a record of information about the area, felled volume, species, and individual specimens, duly georeferenced, as established in the applicable licenses and/or permits. In any case, EDPR must be notified at a minimum about the plant surface affected and restored, the number of new and/or transplanted specimens, and the quantity of wastes generated.
- | Conveniently direct the fall of selected trees to prevent damage to other trees found outside of the limits of areas requiring intervention.
- | Execute the measures or actions necessary for the protection of plant and wildlife present in the zones where activities are executed, according to the applicable Environmental Management/

Surveillance Plan and/or permits/regulations.

- | Have available a specialist that supervises the layout and felling work in marked sensitive areas.
- Collaborate with EDPR in conducting the inspections required in the Suppliers Sustainability Guides.
- | Forbid the presence of people near shredding or clearing machines (safety distance perimeter with a minimum radius of 15 meters).
- No felling, pruning, or clearing work will take place in case of electrical storms as well as in the presence of strong and gusty winds.
- Work near power lines with a risk of electrical arc of electrical contact must be performed under special conditions of network operation, normally applying blocking of automatic reclosers.
- When needing to climb a tree either to place retention devices such as ropes, tractels or similar, or to use a chainsaw, the worker shall be qualified to perform work at heights and be equipped with the necessary means for the task, in particular, safety harness and lifeline or equivalent safety devices.
- If the use of ladders is necessary to climb the tree, the ladders must be safely fastened and secured using ropes or clamps, achieving stability both at its base and at the top end of the ladder. Ladders shall be equipped at their base with horizontal stabilizers.
- When working alongside chainsaw operators, for example to mark the cut lines, the following shall be considered:



- In felling work, the distance that must be kept between the chainsaw operator and another worker must be at least equivalent to double the length of the felled tree.
- In mitre sawing operations, a worker working next to a chainsaw operator, for example to mark the cut lines, must keep a minimum distance of 5 meters from the chainsaw operator.
- When working with a chainsaw, it must NEVER be held or wielded above shoulder height.
- To kick-start the chainsaw, place it firmly on the ground and set the foot on the back handle.
- Verify that the chain is not in contact with any object. Do not start the motor while holding the chainsaw with one hand.
- Refuel the machine with the motor off and have an adequate fire extinguisher available and accessible and in the appropriate area to avoid potential spills.
- Kick-start the machine at a certain distance from the refueling location.
- Transport the chainsaw always with the motor off. Protect the blade with sheaths.
- Always cut using the bottom edge of the blade and towards the ground. Never cut the wood directly with the tip of the blade and avoid its top edge from striking or rubbing against any object.
- Cut pieces must never be held with the feet or by other persons.
- The material stock and waste generated must be stored in the appropriated area and quick managed thereof.

Aspects related to machinery

- | Machines and work equipment must:
- Be suitable for forestry work and carry the following compulsory documentation: instructions manual (in the operator's local language) and maintenance/inspection

records and certificate of conformity.

- Be appropriate for the task in question to ensure that the affection caused is limited to the one referred in the project.
- Be in good operating use and have all its safety devices.
- Users of these equipment or machines must be trained for their use according by Law of the country or EDPR requirements.

| Place signs and rope off adequately whenever the activities interfere with the transit of vehicles or pedestrians.

Always observe the rules on the prevention of fires associated with machinery. The machines must be equipped with fire extinguishers in accordance with the laws of the country.

Comply with the manufacturer's instructions as regards the stability of vehicles in slopes as well as the load limits.

Aspects relating to protective equipment

As regards personal and collective protective equipment and tools used by operators, they must comply with the required in the permits and authorizations and with all of the requisites listed in the Suppliers Sustainability Guides.

As regards personal protective equipment, the following will be considered for felling and pruning work and subsequent treatment of plant waste: hardhat with safety facial screen and hearing protection, cut protection safety gloves (especially fit for chainsaw operation if this equipment is used), safety mechanical resistant safety boots (with steel toe) against cuts by chainsaw, fall protection



system, colored clothing, pants with safety interlining and cut-resistant clothing (jacket, pants and gaiters) when using a chainsaw, protective shin guards and reflecting vest.

As regards collective protection equipment, the following will be considered when carrying out felling and pruning work and the subsequent treatment of plant waste: accelerator blocking device, chain retainer device, anti-vibration device, anti-cut ropes, fire extinguishers, first aid kit, signaling tape, signaling cones and signs for work conducted on public roads. These measures will apply when using chainsaws and other cutting machinery such as brush cutters.

#### Specific aspects

The elimination of large native adult specimens shall be minimized.

In general, felling and pruning of fruit and ornamental trees, as well as crop species, will be avoided. When it is essential to do so, special care must be taken.

The use of tools to be used during forest harvesting must be in accordance with what is authorized by the competent environmental authority.

Clean cutting tools will be used so that they do not cause health risks and minimize the surface affected by the cut.

Pruning will be carried out without the plant species suffering damage that impedes their viability, making clean cuts and in such a way that there is no accumulation of water.

Pruning should always be done from the

bottom of the tree upwards (See Annex I).

Trees or bushes will always be cut at ground level. Once the tree is felled, it will be cut into pieces, cutting all the branches previously. To minimize the risks, cuts will be made with manual tools such as a saw or machete when the size of the branches allows it. The operator should always make the cuts from the uphill side of the terrain, to see how the tree is balanced and in which direction it will move when making the cuts.

In the case of trees with plank or tabular roots, the planks should be cut around the tree before felling starts.

Low branches in the trunk that could hinder the work shall be pruned using traction chain cutting, removing first the upper branches, and moving downward to remove the rest.

Branches shall be removed using an elevated platform whenever possible. In the absence of one and only in the case of healthy trees or trunks, branches can be removed by professionals with specific training in tree climbing techniques. Any job requiring climbing a tree shall only be permitted so long as there is at least another worker with the capacity and means to perform a rescue in case the worker working on the tree suffers an emergency.

| Branches shall be cut by means of cuts flush with the shaft's surface, to avoid damaging tree scars.

If damaged, healing will be applied as needed.

Due the nature of the growth of some trees, it is possible to identify specimens



with a certain natural inclination or with abundant foliage on any given side. When these trees are very inclined, felling will be supported using levers to facilitate turning of the trees and ensure that trimming and pruning leave the tree compensated.

In case of identifying specimens with rotting at the core, it is recommended to fell the tree in sections, starting at the highest part and descending progressively until reaching the ground.

| Manual means shall be used for clearing tasks in places with significant erosional processes or with abundant regeneration or a high density of trees.

| The use of herbicides and pesticides shall be avoided. Exceptional use thereof must have the pertinent authorization.

In all zones and especially in zones with high density cover and affected by the drought, special precaution must be taken when using mechanical means (clearing machines, chainsaws) that, on contact with some elements of the ground (pebbles, metals, etc.) could generate sparks and trigger fires. Likewise, in regions where periods of high fire risk are established, the presence and availability of a water-based fire extinguisher shall be guaranteed at a minimum. Furthermore, additional measures concerning the technical criteria and conditions of the region in question shall be implemented.

If the presence of termites or nests of other insects is identified, the shaft shall be cleaned off to prevent that, at the time of felling, these may disturb the chainsaw operator.

If the presence of mammals, bats or birds (owls, woodpeckers) is identified while pruning, stop work and seek advice from environmental/ecological specialists.

Aspects to consider after completing the works:

Plant biomass remains shall be recovered whenever possible. The work area shall always be left free of clearing, pruning, or felling products. Operators shall proceed in one of the following manners:

Shredding or chipping: in zones accessible to the machines used to perform this task, plant remains will be evenly spread on the ground to facilitate its natural degradation and quick incorporation to the soil, without leaving any remains on the vegetation of the area.

| Logging (size smaller than 30 cm): if shredding is not possible, the remains shall undergo logging and spreading on the ground in the same conditions as above.

Should the local community request it, unprocessed plant remains shall be donated in logs sized less than 1 m. A written record providing proof of delivery of the wood and permitted uses shall be left, including a clear statement indicating that said remains cannot be sold.

Should the above not be possible, plant remains shall be collected and managed adequately by an authorized vendor. Recovery shall be prioritized over elimination.

| In situ incineration will be avoided. If incineration is the only solution, it must be previously



authorized by EDPR; the corresponding permits from the competent body shall be available and all necessary preventive measures shall be taken.

The permanence of felling and pruning remains in temporary stockpiles on the ground shall be determined by the authorization from the competent body. Stockpiles shall be always placed in areas where they do not represent an obstacle for the movement of personnel and equipment related to the operation or for the community, and must be far from drainages, roads and housing.

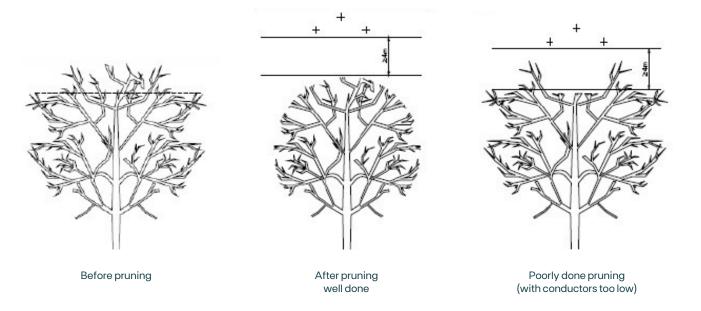
Agricultural practices that foster the onset of plagues and illnesses such as the incineration of waste in the field or the abandonment of unshredded branches of a diameter greater than 6m shall be avoided.

Once clearing, felling and/or pruning tasks are finalized, the work area must be left in an adequately clean condition. The abandonment and/or discharge of any type of waste, especially those that could increase the risk of forest fires (lubricants, fuel, etc.) is prohibited.

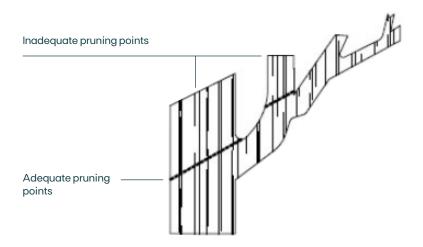


#### Annex I. Pruning methods

#### Affection to trees



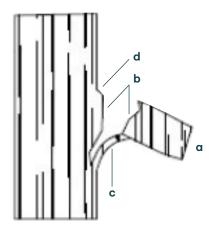
#### **Pruning methods**



Correct way to prune the union with a lateral branch to form low-height canopies

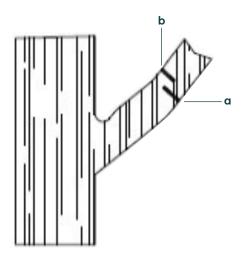


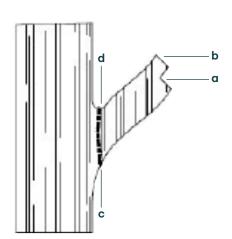
#### **Pruning methods**



#### Incorrect cutting of a thick branch

(a) branch, (b) saw cut that has separated the branch, (c) piece of bark and wood gouged away from trunk, (d) branch union





#### Correct cutting of a thick branch

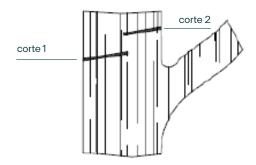
The first cut is made on the lower side of the branch at point (a) at about 150 or 300 mm after the final cutting point; the cut must penetrate until approximately halfway of the branch.

The second cut is made at point (b) at 25 or 50 mm before the cut at point (a), continuing until the branch falls off. The third cut is made at the trunk to remove the growing stump; point (c) indicates the position of the third cut.

The union of the branch is shown in point (d). The stump must be held with the hand to avoid debarking the trunk. All final cuts must be made such that they allow rainwater to run off easily.

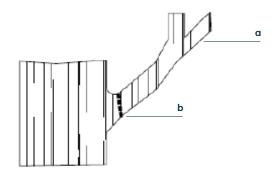


#### **Pruning methods**



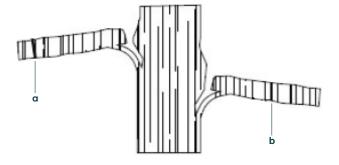
#### Separating a vertical branch

If the branch to be cut is vertical, the cuts must be made at an angle of approximately of 30 degrees in order to prevent the accumulation of water on the cut surface, which would cause it to rot.



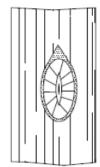
### Separation of an overhang of dry wood that constitute a threat to nearby living parts.

This branch was cut at point (a) but should have been cut at (b).



#### Two other methods of cutting of a thick branch

Only one cut is necessary. The branch must be held using a taut rope firmly fastened at point (a) or using a prop firmly fixed at (b). Both the rope and the prop must remain inclined to keep the branch separated from the trunk at the time of cutting. If the rope or prop should be hung or supported on some existing branch, the latter must be well sheathed to prevent damaging it.



#### Treating a tree scar after cutting a branch.

If the union has not been removed, the operation to recut the scar is not so important. However, a scar trimmed on both ends is highly convenient to achieve good healing.



# Commitments for a Sustainable Supply Chain

# Thank you!



Suppliers Sustainability Guide

Construction works