



EDPR

Suppliers

Sustainability

Guide

CONSTRUCTION WORKS

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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.

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 EDPR Construction Suppliers

H&S AND ENVIRONMENTAL REQUIREMENTS FOR EDPR CONSTRUCTION SUPPLIERS

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1. PURPOSE AND SCOPE

The purpose of this document is presenting the safety, health and environmental requirements (including as environmental requirements those regarding 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.

2. 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 Brazil), 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 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 and cultural assets, working in the scope of the Contract execution.

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 have to include detailed procedures for all the works that are considered high risk activities (work at height, load handling, electrical works, confined spaces, 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 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 is executing the Contract observing the local rules and regulations.
- Evidence that, prior to the commencement of the works, the Contractor has provided to its workers adequate training about the risks of the work that they shall perform. Also, workers have to be informed about Health and Safety measures regarding such work, the protective equipment to be used and the measures to adopt in emergency situations.

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 non-compliance 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. 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.

Before starting work, the Contractor must have delivered the work procedures and instructions to the person responsible for the work/services at EDPR. Said documents must include the necessary HSE guidelines to ensure that work is carried out safely for both people and the environment.

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

3. 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 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.

4. CLIENT-CONTRACTOR RELATIONSHIP

4.1 GENERAL CONSIDERATIONS

The protection of the environment 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 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 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 events and incidents that occur during the execution of the work.

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

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

Both the Environmental 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/archaeological monitoring.

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.

Likewise, all certificates of any training records surrendered to EDPR, or H&S Coordinator/Environmental supervisor, must be valid.

4.5 INSPECTIONS

4.5.1 CONDUCTED BY EDPR

During the performance of the works, EDPR/H&S Coordinator/Environmental 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, Safety and Environmental inspections as soon as possible or within the deadline established by EDPR/H&S Coordinator/Environmental Supervisor.

EDPR/H&S Coordinator/Environmental 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 and/or environmental rules and regulations.

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 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.

5 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 rules below:

- Observe the safety signalization;
- 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 building machines that are working on site. Always must be kept the rule of limited trust and is necessary to remember that 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), in Brazil 40km/h;
- It is forbidden to work and drive any vehicles under alcohol or drug influence;
- Is not allowed to park the vehicles in the working areas of machines; they should be stationed in the designated areas for this purpose.
- It is forbidden to use equipment by unauthorized people or without necessary certificates or trainings;
- 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 keep 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 manoeuvre;
- Access roads to the construction site must be accessible for the emergency vehicles;
- Is forbidden to use any chemical substances, that has not been notified before and do not have Safety Data Sheet;
- All workers are obliged to notify to EDPR any accident, near miss, unsafe condition and unsafe act that may happen in the construction site;
- Is not acceptable to destroy 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.

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

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.

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 the 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.

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 according to the local law, the Contractor shall report any fatal or serious accident to the Labor Authority.

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 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 7. Annexes). 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 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

Sufficiently in advance before the start scheduled for the works, the Contractor will provide the Construction Manager/H&S Coordinator 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.

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 Construction Manager/H&S Coordinator along with their material safety data sheets (MSDS).

The Contractor is obliged to:

- Provide the necessary personal protective equipment for any job that implies the use of chemical products;
- Provide 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;
- 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 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.
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 the them.
9. The tools will be inspected to ensure they are in good condition, preferably in accordance with a periodic inspection program, 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 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
- Technical documentation
- Maintenance instructions
- Declaration of conformity- CE sign (Machines and equipment bought after 1st of January 2003 in EU)/ INMETRO for Brazil
- Declaration of accomplishment of the minimum requirements (Machines and equipment bought after 1st of January 2003)
- 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 operations 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.

When two workers are operating a hoist, they must keep their eyes on the person giving signals, who must keep their attention on the load. Misunderstandings and accidents can be avoided by using the standard 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 in 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 chainfall 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 barricaded 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 work load (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 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
- Simple hand ladders will have a maximum length of 5 meters.
- The use of the safety harness 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 to the building or structure and rest correctly, in order to avoid any possible sliding.

5.5.4 SCAFFOLDS

The Scaffolds must follow the European standards for countries in Europe and Brazil standards for Brazil. Additionally:

- The use of trestle scaffolds is forbidden.
- The scaffolding may only be substantially assembled, disassembled or modified under the guidance of a person with university 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 non-use, exposure to the elements, or any other circumstance that could have affected its strength or stability.

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 (<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.

5.6 AMMENITIES AND REFRESHMENT ROOMS (RESTROOMS, KITCHEN AND OFFICES)

The contractor should provide amenities and refreshment rooms to personnel and those should be kept clean and in order.

5.7 VEHICLE TRAFFIC

The speed limit inside each construction site in European countries is **30 km/h** and **40/km** inside each construction site in Brazil, 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 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 asks 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 Construction Manager/H&S Coordinator 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.

The 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.

5.10 EMERGENCY SITUATIONS/EMERGENCY RESPONSE

The emergency plan and operating procedure during emergency situations 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.

6 ENVIRONMENTAL REQUIREMENTS AT EDPR CONSTRUCTION SITES

6.1 GENERAL RULES

The works performed during the construction phase of a wind Farm/PV plant/HVL/substation 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.

Any environmental-related doubts arising during the provision of the services shall be consulted immediately with the Environmental 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 the Client, 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 the Client, with enough anticipation, about activities such as opening roads, cutting, pruning, restoration, etc, to proceed to communicate it to the competent body and/or request the corresponding authorizations.

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 WASTE MANAGEMENT

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 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 (away from surface waters, groundwaters and natural areas) 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 is only intended for the temporary storage of waste; therefore it cannot be used for storing any other element.
- The maximum hazardous waste storage period established in the legislation in force shall be respected. If there is no legal requirement in this regard, it is recommended not to exceed 6 months.
- Debris derived from the works shall be immediately 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.
- The removal of waste shall be done safely, in suitable containers for each type of waste, to avoid any accidental spill during its transportation.
- Waste transportation 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.
- Accidental spills shall be collected using absorbent material and shall be prevented using appropriate containment basins, where all non-solid hazardous waste shall be placed.
- A fire extinguisher must be available near the waste storage point.

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.

The Contractor shall provide to the Environmental Supervisor all the documentation that evidences the authorization of the waste haulers/handlers, the final treatments to be applied to the different wastes, as well as any other aspect related to the proper management of waste (waste records, etc.).

With the periodicity established by EDPR, the Contractor shall report to the Environmental Supervisor, the information related to amounts of waste generated, final destination and any other related data of interest.

6.4 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.
- Vehicles and machinery shall circulate only on designated areas respecting the established

speed limit at all times 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 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 vegetation clearings are required, the Contractor shall:
 - o Comply with the applicable requirements of the corresponding authorization.
 - o Keep vegetation clearing to the minimum required following EDPR instructions.
 - o Use manual means for clearing tasks in places with important erosive processes or where there is abundant regeneration or high density of trees.
 - o Avoid the use of herbicides and pesticides. Exceptional uses shall be previously authorized by EDPR.
 - o Properly manage plant remains:
 - Vegetal biomass shall be recovered always possible. If it is deposited on the ground, it shall be previously crushed and then homogeneously spread to facilitate a rapid incorporation into the soil.
 - In situ burning shall be avoided. If burning is the only solution, it shall be previously authorized by EDPR, the corresponding permits from the competent body shall be available and all necessary preventive measures shall be taken.

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 affected plant area (which shall be restricted to the minimum necessary), the morphologically restored and replanted area, as well as the number and species planted and/or transplanted.

6.5 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.

- The Contractor shall provide information regarding water consumption and its source of origin to the EDPR Construction Manager and the Environment Supervisor.
- 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. 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 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.
- Maintenance tasks 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 in water courses is strictly forbidden.
- Extreme caution shall be exercised when working near water streams to ensure that its hydraulic capacity and quality remains unaltered.
- 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. Drainage systems shall be maintained in proper conditions, always free of waste that may obstruct the flow of water.
- Roads shall be avoided in the vicinity of streams and gullies.
- 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.
- 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.
- 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):
 - o located in suitable places far from surface waters, groundwaters and natural areas,
 - o coated with geotextile blankets and properly signalized and fenced,
 - o properly used and maintained, preventing overflow to the surroundings,
 - o that shall be recovered once its use is finished.

6.6 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.
- 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.
- 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.
- Noisy activities foreseen close to inhabited areas shall be adequately scheduled to avoid disturbances.
- 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.

- To avoid dust generation, the following considerations shall be implemented:
 - o When necessary, apply periodic irrigations on roads and paths.
 - o Protect stockpiles and cover the material to be transported.
 - o Reduce the pouring height of machines during earthworks.
 - o If necessary, wash the wheels of the trucks at the exit of the construction site.

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 vehicles (or distance traveled) and auxiliary equipment (for example, generators), for the purpose of calculating the associated CO₂ emissions.

6.7 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.
- 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.
- 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 6.11 shall be followed.
- 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.
- Waste from excavations shall be reused in the filling of roads and embankments. If there is any left over, it shall be taken to an authorized landfill.

- At the end of the works, the compacted soils (due to the passage of machinery, stockpiling of materials, etc.) shall be prepared for restoration.
- Regarding topsoil withdrawal and management, the following considerations shall be implemented:
 - o Selectively withdraw the topsoil, treating separately the layer containing organic matter and nutritional elements.
 - o Store topsoil separately and free of stones and vegetal remains such as branches.
 - o Ensure that topsoil stockpile height does not exceed 2 m and avoid the passage of machinery over them.
 - o Uniformly distribute the topsoil (a layer of about 10-15 cm) over the degraded areas where the seeding will take place.

6.8 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.

6.9 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.
- Any situation that may affect local communities shall be immediately notified to the Client.

6.10 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.
- 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.

6.11 ENVIRONMENTAL NEAR-MISSES AND ACCIDENTS

6.11.1 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.

6.11.2 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 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 but also in all mobile equipment.
- 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.

6.11.3 ENVIRONMENTAL EMERGENCY RESPONSE

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

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

If the emergency situation has consequences on the environment, the Contractor shall act 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.

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, 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.

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

7 ANNEXES

- *Injury and Illness Status Notification Form:*



MONTHLY CONTRACTOR DATA

WIND FARM / PV PLANT:

CONTRACTORS (O&M / E&C)	WORKED HOURS	N° OF ACCIDENTS		N° LOST DAYS (in the current month)
	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)	
CONTRACTOR: #name				
SUBCONTRACTOR 1: #name				
SUBCONTRACTOR 2: #name				
SUBCONTRACTOR n:				
TOTAL	0	0	0	0

Commitments for a Sustainable Supply Chain

EDP Supplier Code of Conduct

Scope

1. The EDP Supplier Code of Conduct applies to entities that supply or intend to supply goods and services to any of the EDP Group companies (hereafter “Supplier” or “Suppliers”), which is deemed to be the group of companies in a control or group relationship with EDP, regardless of whether their headquarters are in Portugal or another country.
2. Approval and compliance with the Code of Conduct is a contractual obligation. It is a binding annex of the bidding documents for EDP Group procurement as well as in contracts for the supply of services or sale of goods, to be signed by the supplier and any EDP Group company. The contracts to be signed by the EDP Group and Suppliers shall envisage that in case of serious or systematic breach of this code, the EDP Group may terminate the contractual relationship.
3. This Code of Conduct does not establish commitments contrary to existing law, regulations or current contractual provisions, nor does it add or derogate from new rights. Its provisions and standards are supplementary in nature.
4. Suppliers should promote the adoption of sustainability policies in procurement and make the best efforts to ensure that levels of demand equivalent to those of this Code are also respected in their own supply chains.

Suppliers of the EDP Group agree to the following commitments, taking as reference the principle of highest demand:

Compliance Commitments

- a) Comply with national and international legislation in force that is applicable within the scope of the existing contractual relationship with the EDP Group, namely the laws, regulations, the operational, technical and sectoral rules and regulations, on matters such as: processing and protection of personal data, combating corruption, separation of activities in the sector, anti-trust, environment, health and safety, intellectual property rights, as well as the contractual arrangements established with the EDP Group companies.
- b) Not to pursue, permit, consent to or collude with any activity, practice or conduct likely to constitute or appear to be an act of bribery and/or corruption, criminally punishable under applicable law. Also, to institute procedures and implement necessary and appropriate measures aimed at preventing their occurrence.
- c) Respect internationally accepted corporate principles, values and best practices in matters concerning human rights, labor rights, workplace safety and health, prevention and combating corruption, and having measures in place to prohibit the practice of anti-trust acts or acts seeking to restrict competition in the market.

Ethical commitments

- a) Promote and respect the highest ethical, moral and human integrity standards, in particular the principles enshrined in the EDP Group Code of Ethics.
- b) Respect the principles and commitments with customers and communities, whenever acting on behalf of the EDP Group, working in their facilities or using their information.
- c) Inform, through the Ethics Ombudsman or other EDP Group Ethics channels, of the existence of potential conflicts of interests in relations with the EDP Group, whether of a business or personal nature.
- d) Refrain from offering gifts, goods or free services, or coerce or restrict EDP Group employees in any way to influence their business dealings with the EDP Group.
- e) Truthfully and accurately convey information concerning management practices.

Environmental Commitments

- a) Comply with national legislation and international standards for environmental protection, and obtain the environmental certifications required for their business activities.
- b) Identify, monitor and mitigate the environmental risks and impacts of their activities, products, materials and means of transport, promoting continuous improvement and conserving the environment.
- c) Promote the continuous streamlining of the consumption of energy and natural resources and the reduction of emissions and waste generated by the business activity.
- d) Comply with the EDP Group’s environmental requirements when acting on EDP Group premises or facilities or acting on behalf of the EDP Group.

Labor commitments

- a) Respect freedom of association and the collective bargaining of their workers, establishing mechanisms of dialogue free from any reprisals or discrimination.
- b) Ensure and promote the respect for free labor, based on fair and transparent contracts for workers, refusing to use and be complicit with forced labor, unjustified restrictions on free movement, misappropriation of documents and remuneration and human trafficking.
- c) Respect diversity, promoting equality and non-discrimination based on race, age, gender and sexual or marital orientation, ethnic or national origin, name, disability, pregnancy, religion, politics, cultural or trade union orientation. Respecting also any other conditions that may be defined by contract or protected by applicable law.
- d) Ensure adequate remuneration to workers, in accordance with current legislation and collective labor agreements, when

applicable, which shall be paid on time, respecting the minimum wages established in each country, paying overtime and other compensation, social security contributions and taxes that are due.

e) Ensure compliance with current labor legislation and collective labor agreements, when applicable, regarding the maximum normal and supplementary working hours, as well as the rest periods and rest days.

f) Prevent any form of child labor, under national regulations and ILO 138 of the International Labor Organization.

g) Establish disciplinary measures and procedures in accordance with the laws and international conventions, publicizing the standards and ensuring the hearing and defence by those accused of disciplinary breaches, and preventing in all cases any intimidation, verbal or physical abuse or aggression, or any other type of moral or physical harassment.

Workplace Safety and Health Commitments

a) Comply with national legislation and international standards in force on workplace safety and health, as well as the EDP Safety Policy and the specific certifications required, observing the precautionary principle in all activities, promoting responsibility and the awareness of everyone involved.

b) Identify, monitor and record all risks associated with their activity and specific work tasks, establishing prevention, reduction and continuous improvement measures.

c) Train the workers and equip them with the means and equipment for their personal protection, ensuring they have adequate working conditions.

d) Define accident management and emergency preparation measures appropriate to the type of activity, location and circumstances.

e) Comply with the EDP Group's Safety and Health requirements when acting on EDP Group premises or facilities or acting on behalf of the EDP Group.

Community and Human Rights Commitments

a) Promote the consultation, respect and protection of human rights, the dignity of people and privacy of each individual, of the communities on which the business activities impact in their area of influence.

b) Ensure that all business activities are conducted without recourse to violence or abuse and reject and refuse any complicity with human rights violations.

Management commitments

a) Adopt management procedures that permit compliance with this Code to be monitored. There is an obligation to report any serious breaches to EDP and to provide evidence of compliance when requested by EDP.

b) Ensure that all persons employed, regardless of the nature of the legal relationship, comply with the provisions of this Code of Conduct and are informed, qualified and competent to perform their duties in accordance with its terms.



Occupational Health & Safety Policy



renewables

The health and safety of those who contribute to the EDP Group's activities, whether they be employees or service providers, contractors or subcontractors, is a key value and a priority for the success of EDP as a business Group.

We aim, therefore, to pursue and build on a positive safety culture in which every employee, service provider and supplier is engaged, and to promote it amongst clients, communities and all

those who could be affected by the normal conduct of our activities.

By undertaking the EDP commitment and complying with applicable safety standards and procedures, exceptional levels of performance will be achieved, making the EDP Group's companies an ever better working environment

The EDP Commitment

- The corporate management of the EDP Group is determined to constantly strengthen the culture of occupational health and safety, by developing awareness, deepening willingness and making available the resources required for:
 - Guaranteeing a safe and healthy work environment for its employees, ensuring compliance with the law;
 - Providing its employees with training and awareness on the risks related to its activities, raising their awareness to the compliance with safety standards
 - Protecting facilities and equipment by adopting the best techniques, combined with the monitoring and updating of work procedures in order to eliminate or minimise risks to employees, service providers and any third parties who may be in contact with our infrastructure;
- Safety is an integral part of the quality of services and products in all the companies in the EDP Group.
- The effectiveness of the safety policy and the continuous improvement of occupational health & safety performance must be achieved through the involvement of all levels of management and the support and input of all employees, service providers, suppliers and stakeholders. To this end EDP requires all its service providers to adopt practices in line with the principles underlying this policy.
- No situation or service emergency may justify putting anybody's life at risk.
- This Occupational Health & Safety policy, and the principles approved, applies to all EDP Group companies, in the different geographies.

Guiding Principles on Safety Practice within the EDP Group

- 1 Safety - understood as occupational health & safety - is an integral part of the activity of the companies within the EDP Group and is taken into account in all decisions: in project design, in construction, in exploitation, HR management, procurement, customer relations, supplier relations and with the general public.
- 2 Safety is an attitude and a will - that integrate the activities of each one - which is stated at all times in the fulfilment and compliance with the applicable legal requirements, standards, rules and procedures, and in the initiative and contribute to its improvement.
- 3 Safety is a component associated to the hierarchical responsibility, which is responsible for ensuring the implementation of the rules, assuming a visible and permanent personal commitment, promoting training and awareness of its employees and controlling the environment in which the work takes place.
- 4 Every Company assumes, at all times and for each situation, the performance of its activities pursuing "zero accidents" objective, through the continuous improvement in the safety management and performance, with the definition of concrete progress objectives.
- 5 Safety at work must be achieved through the systematic risk analysis, involving employees and their representatives, as well as service providers, when appropriate, to identify and deal, in the preparation of the work, all the risk situations which are expected to converge for the acceptable risk. If a job cannot be carried out safely, it should not be done at all or it should be stopped.
- 6 Research and analysis of incidents – accidents and near-misses – carried out systematically, are an essential condition for the continuous improvement on the prevention of occupational accidents and occupational diseases.
- 7 No action shall be taken against any employee who shows occupational health & safety concerns or for reporting a near-miss, unless an unlawful or malicious disrespect has been committed consciously and intentionally for any safety regulation or procedure.
- 8 The safety procedures must be kept permanently up to date, according to the existing risks and the applicable local regulations



Environmental Policy



EDP Renováveis Group assumes the environment as a strategic management element, seeking to reduce the impacts of its activity on it through a set of commitments that ensure the implementation and maintenance of environmental management systems that are appropriate and effective, with the ultimate goal being sustainable development, specifically:

1. **Protect the environment** in its various components and integrate it in the decision-making processes, considering, whenever possible, a life-cycle perspective.
2. **Mitigate the environmental impact** in all phases of the decision-making processes, favouring the hierarchy of mitigation.
3. **Appropriately manage the environmental risk**, particularly the prevention of pollution and the emergency response in case of an accident and/or catastrophe.
4. **Promote continued improvement** in the processes, practices and environmental performance, **stimulating R&D + Innovation** within the framework of the established environmental objectives.
5. **Comply with and respect the applicable environmental legislation**, as well as other obligations assumed voluntarily.
6. Take into account the **expectations of the main stakeholders** in the decision-making process.
7. Expand the management and the improvement of environmental performance to the **value chain**.
8. **Communicate the performance**, within the framework of its ethical principles, in a regular and transparent manner, ensuring balance, understanding and accessibility by the interested parties.
9. **Empower people and raise awareness** for the improvement of individual and collective environmental performance.

Based on the strategic priorities of the Group, EDP Renováveis furthermore assumes specific commitments to complement the previous points, in the following environmental domains:

CLIMATE

Contribute to decarbonisation, progressively providing low-carbon energy solutions, specifically through:

- Increasing its renewable energy portfolio
- Promoting internal energy efficiency among the suppliers and in the final consumption
- Providing low-carbon products and services to their clients

SUSTAINABLE USE OF NATURAL RESOURCES

Promote the efficient use of natural resources in its activities, within the framework of a circular economy, specifically:

- In the use and sustainable management of water in all the processes, operations and installations
- In the consideration of the environmental aspects throughout the life cycle of the products and services

BIODIVERSITY

- Contribute to the prevention or reduction of loss in biodiversity, favouring a dynamic, wide-ranging management, with local participation and a long-term vision with the ambition for a globally positive balance
- Contribute to deepening scientific knowledge on the different aspects of biodiversity, specifically through the establishment of partnerships

thank you!



EDPR Suppliers
Sustainability Guide

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