



Suppliers Sustainability Guide

Construction Works – Quick Guide



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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.

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.

1. H&S AND ENVIRONMENTAL REQUIREMENTS FOR CONSTRUCTION SUPPLIERS

1.1 General considerations

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.

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 the environment, as well as 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 H&S supervisors) based on the total number of workers they have 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 to HSE rules.

The Contractor shall provide proof to EDPR/H&S coordinator/Environmental Supervisor, 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, trucks loading/ unloading activities, crane transfer between platforms and others that could be established in the regulations of the countries, 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 HSE 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. A proof of this specific training must be provided to EDPR.

- Evidence that the personnel has the necessary knowledge and skills to act efficiently in case of an environmental emergency (spills, fires, etc.). Adequate materials and means shall be available for use in preventive and corrective in case situations that pose an environmental risk to the site or human health.

During the performance of the works, EDPR/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 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 and/or environmental rules and regulations.

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

1.2 Health and Safety requirements at EDPR facilities in construction

All people on site (workers and visitors) should be familiar with and follow the rules below:

- Contractor must implement Last Minute Risk Assessment routine in the project. It must be documented and daily reported to H&S Coordinator or Supervisor who shall supervise, in a sample way, the correct implementation of this register. The model corresponds to the principle of several questions to be answered, and the works can only start if the response of all questions is “yes”. If the supplier does not have its own procedure to carry out the LMRA, it can request support from EDPR.
- 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.
- 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;
- 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, according to the H&S plan and the risk assessment, 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;
- Workers are obliged to follow the speed limit which is binding on site (30 km/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;
- 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. 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, must be accessible for the emergency vehicles;
- All works should be provided in the way, which do not create any additional hazards and don't disturb the works of other people.

For this purpose, the Contractor is committed to act according to the following requirements:

Prior to the beginning of the works, the Contractor must facilitate the company, employee and equipment documentation required by EDPR/H&S coordinator, as well as that of its subcontractors, through Safety document management tool. 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 the event of a near miss or accident, the Contractor, once he has stopped the work and/or isolated the area to prevent its consequences from repeating or extending further, **shall notify the event immediately** (by phone, verbally or by e-mail, etc.) to the EDPR person responsible for the installation or the EDPR person responsible for the supervision/management of the work.

Next, the Contractor must send a Near Miss/Accident Report within a maximum period of 24 hours. Said report must include at least the what, how, where and when the injury/material damage occurred, as well as the personnel/equipment/facilities affected and all the reliable and relevant information available to understand the nature of the event.

Next, and before the following 72 hours and through the same communication channels, the Contractor will send EDPR a final Near Miss/Accident Investigation Report.

The content of this investigation report shall be, but not limited to description of the incident or event, witness statement (if applicable), root cause analysis and identification, conclusions and action plan related to the root causes analysed.

The Contractor must notify to EDPR as soon as possible of any incident or near miss as well as of any unsafe acts or conditions that may arise in the facility areas of EDPR.

- If the use of cranes is necessary, with sufficient time before the start scheduled for the works, the Contractor will provide the Construction Manager/H&S Coordinator/Safety document management tool with the working procedure and the crane manual. These documents must include the authorized wind speeds for each operation of the crane. In addition, the procedure must define the responsibilities of each figure involved in the work, in relation to decision making/supervision of work.

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.

- The Contractor cannot leave the crane, in any case, if it is not in safety position.
- Prior to using chemical substances at the construction site, the list of chemical products must be sent to the EDPR Construction Manager/H&S Coordinator/Safety document management tool along with their material safety data sheets (MSDS/FSIPO) in the local language.
- The Contractor shall only use tools, machinery and equipment that are adequate and technically suitable and that have valid documentation. The Contractor must regularly inspect power tools and must remove them immediately if any defects are detected. Only certified portable tools with their corresponding CE/INMETRO and equivalents for other geographies marking will be used.
- The Contractor is obliged to have in the installation of the mechanical equipment for the handling of loads appropriate to the work to be carried out.
- 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 his 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/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. Facilities that have special driving risks (wind farms or PV plants with high slopes, areas where heavy snow is frequent, etc.) will require the use 4x4 off-road vehicles.
- Any vehicle transiting through EDPR EU&LATAM construction sites must be equipped with high visibility vests for the workers (no mandatory in EDPR NA). Additionally, if the legal regulations ask for it, any car transiting through the facility must carry a fire extinguisher.

- With respect to the transiting of heavy vehicles or large vehicles, the Contractor must prepare a Heavy Vehicle Transit Plan for the Facility, which must indicate the paths vehicles must follow depending on the wind turbines that will be visited. 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/Safety document management tool for review prior to the beginning of the works. Heavy vehicles may not access the facility without the approval of said Plan.
- Cars that are used for transportation of tools and/or materials must have a separate transportation area from the passengers/driver zone. All gas bottles must be transported in a vertical position. Tools and materials transported in the car must be prevented from moving freely in the transportation zone.
- Ladders must be according to workload (kgs) and according to country regulations. 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 use of trestle scaffolds is forbidden. The scaffolding may only be substantially assembled, disassembled or modified under the guidance of a 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. 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. 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.

- Regarding working at heights, 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 height protection. Preferably Collective Protection Equipment shall be applied and if no possible Personal Protection Equipment.

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);
- The Contractor is obliged to provide the technical measures necessary to respond to emergency situations (such as fire extinguishers, first aid kit, etc.) and ensure that its workers have constant access to these (employee’s vehicles and work areas). In the event that any of these devices owned by EDPR are used, EDPR shall be notified immediately so that the supplies that may have been used/consumed may be replaced.
 - The Contractor must have an operational defibrillator at EDPR facilities, as well as personnel with adequate knowledge and training in its use.
 - 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 at EDPR facilities, as well as to deliver to the EDPR person responsible for the installation the signature sheet attesting to said communication.

1.3 Environmental requirements at EDPR facilities under construction

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 and the cultural assets.

The Contractor must act with respect for the Environment and local communities and take all the necessary measures to prevent any impact.

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.

The Contractor shall inform, 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. The Contractor shall execute and/or provide the contracted works/services ensuring the maintenance of the order and cleanliness in the worksite and its surroundings. Once finished, the area shall remain in the same conditions as before starting the work.

All waste generated, both hazardous and non-hazardous, shall be properly managed in compliance with the applicable legislation. The Contractor, as producer and owner of the waste generated during the execution of its activity, shall ensure the proper storage and management of waste, according to the applicable legislation in force.

Until delivered to an authorized vendor, waste will be temporarily stored in an area fit for this purpose (away from surface/underground water and areas of natural interest), and properly conditioned indicating clearly the presence of waste while complying with all applicable regulations.

Waste will be managed guaranteeing the application of the hierarchy principle that prioritizes prevention, preparation for reuse, recycling or other forms of recovery, including energy recovery, elimination being only an option when none of the above 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.). Following the frequency established by EDPR, the Contractor shall provide information regarding the quantities of waste generated, its final destination and any other information of interest.

The Contractor shall execute and/or provide the contracted works/services with maximum respect for the environment and the local communities, taking all the necessary measures to prevent any impact on vegetation and wildlife, watercourses, waterbodies, and soils, as well as to avoid air pollution, noise generation and visual impact. For that purpose, the Contractor is committed to act according to the following requirements:

- Occupy neither wildlife or vegetation sensitive areas nor protected habitats, to avoid affectation. Areas to be protected and the type of fences to be used should be clearly stated in the description of the works and remained at the periodical meetings.
- Wildlife entrapment effects shall be minimized by filling and closing ditches and foundations as soon as possible.
- Immediately notify Environmental Supervisor and/or EDPR Construction Manager in case of finding any injured or dead animal or abandoned animal remains (carrion).
- Limit the movement of vehicles and/or machinery to the strictly necessary to perform the works, only on designated areas and respecting the maximum speed of 30 km/h in Europe.
- Do not discharge any type of waste or wastewater.
- Any water withdrawal requires an authorization from the corresponding body and all applicable requirements shall be fulfilled
- Always use water from an authorized source at the worksite.
- Ensure construction works do not hinder the drainage capacity of the streams, decrease the flow or affect the quality of the water.

- Do not light fires on the ground.
- 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 watercourses/bodies to prevent runoff from dragging the accumulated materials into the riverbed considering the zoning established for each project.
- Maintenance tasks and refueling operations of equipment and mobile machinery shall be performed in appropriate facilities for this purpose or 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.
- Extreme precautions in operations involving concrete to avoid spillage, especially in the case of work taking place near water courses.
- Take all necessary preventive measures when conducting operations that may cause a spill and/or fire.
- In case of an accident with environmental consequences, act immediately in a coordinated manner with EDPR to minimize and mitigate the damages. EDPR should be notified within 24 hours of the accident, and a *Report: Action Plan* should be submitted within 72 hours.
- When vegetation clearings are required, comply with the applicable requirements of the corresponding authorization, and see Annex I. Felling and pruning good practices
- Keep vegetation clearing to the minimum required following EDPR instructions
- Properly manage plant remains from land clearing and do not use herbicides or pesticides. Works for plant clearings should be carried out by specialized personnel and proper machinery.
- Minimize land occupation to the strictly necessary for the execution of the works, delimiting each area with visible elements.
- Schedule noisy activities to be performed near inhabited areas during the most appropriate periods to avoid disturbances.
- Respect any cultural/archaeological assets that may exist in the surroundings of EDPR facility premises to avoid their deterioration or damage.
- Use materials that come from legally authorized quarries or from authorized facilities for the recovery of construction and demolition waste.
- At the end of the works, the morphological and vegetal restoration of the land will be carried out.



Thank you!

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