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## 0. CHANGE CONTROL

Edition	Date	Description of the modification
00	November 2023	Integration between Environmental and Occupational Health and Safety and Social management system

## 1. OBJECTIVE AND SCOPE

The purpose of this technical instruction is to define the process to identify, record and respond to the complaints and grievances of the employees, contractors, suppliers, any workers working in Xuan Thien SPV related to HSE&S and other workplace and labor management relationship related issues, this technical specification ensure that the essential requirements for its effective control and management are in place.

This technical instruction shall only apply to the facilities and activities in Xuan Thien SPV in align with procedure: *HSEMS-VN\_PR-HSE\_011 "Management of HSE Complaint"*.

## 2. REFERENCE

- ISO 14001:2015 standard.
- ISO 45001:2018 standard.
- AIB standard.
- HSEMS-VN\_MN-HSE-01 *HSEMS Manual*
- HSEMS-VN\_PR-ENV-01 *Identification and assessment of environmental aspects*
- HSEMS-VN\_PR-HSE-03 *Communication, Consultation, Participation*
- HSEMS-VN\_PR-HSE-011 *Management of HSE Complaints*
- Whistleblowing Management Policy
- Whistleblowing Management Procedure

## 3. DEFINITIONS

- **Complaint:** a written, electronic or oral statement that somebody makes to express their dissatisfaction or displeasure about something.
- **Complainant:** any person, from outside of the organization, who claims something because he/she believes that he/she has the right to it.
- **Complaint Receiver:** any person who receives a complaint in the first instance.
- **Complaint Owner:** person/s in charge of the analysis, resolution and monitoring of every specific and individual complaint, as well as being in contact with the complainant.
- **Environmental Complaint:** a written, electronic or oral statement that somebody makes to express their dissatisfaction or displeasure about any environmental issue or personal disturbance (mainly due to noise, shadows, problems with TV reception, etc).
- **H&S Complaint:** a written, electronic or oral statement that somebody makes to express their dissatisfaction or displeasure about any H&S issue.
- **Social Complaint:** a written, electronic or oral statement that somebody makes to express their dissatisfaction or displeasure about any social issue or personal disturbance (including but not limited to employee well-being, sexual harassment, moral harassment, discrimination, child labor, forced labor, late payment of salary, abuse, bully, corruption, human right, etc...).
- **Stakeholder Claims Management tool:** corporate tool to record all the complaints received in EDPR Corporate Tool.

#### 4. ABBREVIATION

- **BU:** Business Units.
- **EDPR APAC:** EDP Renewables Asia Pacific.
- **ENV Manager:** ENV Manager in each country.
- **H&S Manager:** H&S Manager in each country.
- **HSEMS:** Health, Safety and Environmental Management System.
- **SCM:** Stakeholder Claim Management tool
- **GRIEVANCE:** Health, Safety, Environment, and Social.

#### 5. PROCEDURE

The use of an effective grievance complaints mechanism facilitates early indication of, and prompt remediation for those who believe that they have been affected by the company's actions, from an environmental or H&S, point of view.

Through the analysis of the grievance Complaints received for Xuan Thien SPV, EDPR Vietnam is able to identify areas for improvement in the organization and take the appropriate actions for correction/remediation.

The Xuan Thien *Management of Grievance Complaints* procedure is scaled to the risks and adverse impacts of its facilities as its primary user. It seeks to resolve concerns promptly, using an understandable and transparent process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern.

This mechanism does not impede access to judicial or administrative remedies.

All people working in Xuan Thien SPV will have two options for reporting the grievance complaints as follow:

**Option 1:** All grievance complaints can be report in the Stakeholders Claims Management (SCM) tool following the process defined for this purpose and fulfilling/attaching the necessary information to keep it updated till its closing via channel:

["https://portaletica.dig.corp.edp.com/PortaldeEtica\\_SitesCorporativos/Disclaimer.aspx?GUID=f6e30c95-b3d0-4085-b6ef-2bf0f2db0b28"](https://portaletica.dig.corp.edp.com/PortaldeEtica_SitesCorporativos/Disclaimer.aspx?GUID=f6e30c95-b3d0-4085-b6ef-2bf0f2db0b28).

**Option 2:** All grievance complaints can be report to the people in-charge at project level and Vietnam as below contact information:

	Name	Telephone No	Email
Xuan Thien Project	Tran Thi Thu Lap	0971371200	<a href="mailto:Lap.tran@edp.com">Lap.tran@edp.com</a>
	Ha Thi Thu Nga	0939744161	<a href="mailto:Nga.ha@edp.com">Nga.ha@edp.com</a>
Vietnam	Luong Thi Thu	0914083650	<a href="mailto:Thu.luong@edp.com">Thu.luong@edp.com</a>

EDPR employees in charge of recording complaints in the SCM tool are Project managers (complaints related to permitting, development and/or construction phases) and Asset managers (complaints related to operation phase)

All complaints shall be logged in the SCM tool and complaint monitor logbook at the site follow *HSEMS – VN\_PR – HSE – 11/[TMP-02] “Grievance Complaint Monitoring Template”* as soon as possible since its reception

The SCM tool and project monitor logbook enables the collection of the following information:

- ID
- Claim receiver
- Complainant
- Claim owner
- Country
- Stage (permitting, development, construction, operation)
- EDPR company
- EDPR project/facility
- Category (Environment, H&S, etc)
- Typology (noise, biodiversity, emissions, landscape, etc)
- Claim Description
- Claim receiving date
- Claim Opening date
- Last update
- Claim Closing date
- Cost (€): costs arising from the claim.

The assignment of complaints to each Complaint Owner will be made following the guidelines established.

### 5.1. RESPONSE & CLOSE

The Complaint Owner shall analyze the complaint and look for a suitable solution. Whenever possible, the corrective action shall be intended to remove the cause of the claim in order to avoid it happening again, not just to solve the current problem.

The HSE complaints information in the SCM tool shall be updated whenever the progress of the process makes it necessary, and at least once every 30 days when complaints are in process of resolution. The date of last update shall be always recorded.

When managing HSE complaints, the Complaint Owner shall respond the complainant using the same means of communication and language used by the complainant (unless justified otherwise). The complainant shall be informed about the proposed corrective action or clarify why a corrective action is not required.

During and after the implementation of the corrective action, the Complaint Owner shall monitor the progress of the process and provide the corresponding information to update the complaint in the SCM tool.

Communications arising from the analysis and resolution of complaints shall be kept as evidences.

All complaints at project level will be reviewed and responded with remedies within 30 days.

## 5.2 GRIEVANCE COMPLAINTS MONITORING

The identification, recording and resolution of grievance complaints are essential features of management system since it ensures that all grievance concerns are identified and properly solved.

For that purpose, the ENV manager and H&S manager in Vietnam and ENV Officer at project level, shall analyze and monitor HSE Complaints, and Social Officer shall analyze and monitor social complaints periodically with these main objectives:

Regularly monitor the grievance complaints received, ensuring its management and thereby achieving the object of this procedure.

Ensure that whenever possible, the corrective action is focused to remove the cause of the claim in order to avoid it happening again, not just to solve the current problem.

Perform a comprehensive analysis of all grievance complaints received to identify common causes, standard solutions, etc and share this knowledge to prevent similar complaints elsewhere or avoid a complainant response delay longer than necessary.

Analyze the performance of the company regarding complaints management and consider if the procedure fits the organization reality or otherwise, it should be reviewed.

The following indicators, and any others deemed useful, shall be monitored in order to analyze the goodness of the performance of the company, both globally and by type of complaints:

- a. The age of the complaints with status "in process".
- b. Number of complaints received in a time period.
- c. Average time of complaints resolution.

## 6. RESPONSIBILITIES

Task	ENV	HSEM	Plant/ project HSE in-charge	Plant manager	Any complaint receiver	ECD administrator	Complaint Owner
HSEcomplaints process	Analyze and monitor Environmental Complaints periodically and include the conclusions of the analysis in the Manage	Ensure the implementation of this procedure	Analyze and monitor Environmental Complaints periodically and include the conclusions of the analysis in the Management review report.	Promote a proactive attitude among the wind farm staff for the early detection of those issues that could cause future Environmental Complaints	In the event of receiving an oral complaint, ask the complainant to record it in the Public Grievance Form or record it himself/herself	Register the initial complaints data in the ECD as soon as possible since its reception	Analyze the complaint and look for a suitable solution trying to focus the corrective action in the removal of the cause of the claim
HSE complaints monitoring	Inform periodically to the Country EMS Management Representative about the implementation of the procedure and the status of the complaints	Analyze the Environmental Complaints together with the EMS manager and agree the necessary preventive and correctives measures in a global manner		Ensure that all Environmental Complaints received at the wind farm are properly recorded and immediately communicated to the ECD administrator	Send immediately a copy of any complaint received to the ECD administrator and keep the original record as evidence	Assign the person in charge of each complaint (Complaint Owner)	Monitor the progress of the process during and after the implementation of the corrective action
Reporting of conclusions regarding environmental complaints process	Coordinate with the concerned departments the implementation of the necessary preventive and corrective measures Report in SIS quarterly the information regarding environmental complaints and penalties	Appoint the ECD administrator		Ensure that the Public Grievance Form is available at the wind farm for any stakeholder Support the implementation of the corresponding preventive or corrective measures, if so		Ensure that the ECD is periodically updated	<ul style="list-style-type: none"> <li>- Provide the necessary to update the complaint in the ECD, whenever the progress of the process makes it necessary and at least once every 30 days when complaints are in process of resolution</li> <li>- Respond the complainant providing information about the proposed corrective action or clarifying why a corrective action is not required</li> <li>- Keep communications arising from the analysis and resolution of complaints as evidences</li> </ul>

## 7. TEMPLATES

HSEMS-VN\_PR-HSE-11/[TMP-01]: Public Grievance Form

PUBLIC GRIEVANCE FORM		HSEMS-VN_PR-HSE-11/[TMP-01]	
<b>Reference number:</b>			
<b>Full name:</b>			
<b>CONTACT INFORMATION</b> Please mark how you wish to be contacted (mail, telephone, e-mail):	<input type="checkbox"/>	<b>By Post: please provide mailing address:</b>	..... .....
	<input type="checkbox"/>	<b>By Telephone:</b>	..... .....
	<input type="checkbox"/>	<b>By e-mail:</b>	..... .....
			..... .....
<b>Preferred language for communication:</b>			
<b>Description of the incident or the grievance</b>			
<i>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</i>			
..... ..... .....			
<b>Date of the incident /grievance</b>			
<input type="checkbox"/>	One time incident/grievance (Date: ____/____/____)		
<input type="checkbox"/>	Happened more than once (how many times? .....		
<input type="checkbox"/>	On-going (currently experiencing the problem)		
<b>What would you like to see happen to resolve the problem?</b>			
..... .....			
Please send this form to		Signature	
Mr/Mrs:.....			
EDP Renewables:.....			
Address:.....			
Telephone:.....			
Email:.....		Date:	

HSEMS-VN\_PR-HSE-11/[TEMP-02]: Project Grievance Complaint Monitoring Form

No STT	Claim ID No Số khiếu nại	Reiceived Date Ngày nhận khiếu nại	Claim Receiver Người nhận khiếu nại	Complainant Người khiếu nại	Claim Owner Chủ thể của khiếu nại	Country Quốc gia	Stage Giai đoạn	EDPR Company name Tên công ty của EDPR	EDPR Project/ Facility name Tên nhà máy/ dự án của EDPR	Category of Complaint Hạng mục khiếu nại	Typology Loại khiếu nại	Claim description Mô tả nội dung khiếu nại	Claim receiving date Ngày nhận khiếu nại	Claim opening date Ngày thực hiện giải quyết khiếu nại	Last update Cập nhật cuối cùng của khiếu nại	Claim closing date Ngày đóng khiếu nại	Cost arising from claim Chi phí bồi thường phát sinh đến khiếu nại	Status Tình trạng

## 8. ANNEXS

HSEMS – VN\_TI – HSE&S – 01/ANX-01 “Use Guide for complaint report at corporate level.”

**First step:** Ctrl + Click to follow the link: [Disclaimer \(edp.com\)](https://www.edp.com)

**Second step:** Select the concern you wish to contact us about:

Please note the following before registering a contact using this form:

1. EDP makes this channel available to all its employees, customers, suppliers and other stakeholders to report bad practices and/or doubts of an ethical nature, regulatory non-compliance, both external and internal, and the issues provided for in Law 93/2021 of 20 December.
2. All reports are directly addressed to the Ethics Ombudsperson and, when the matter is regulated by specific legislation, simultaneously reported to the Compliance Department.
3. EDP assumes the explicit commitment to protect the whistleblower, namely through unequivocal principles of non-retaliation against those who resort to this means in good faith and in a justified manner.
4. The confidentiality of complainants, whenever intended, is guaranteed by the security mechanisms of the information systems in use.
5. By submitting the online form, you must declare that you have read the privacy policy and that you are aware of the data processing carried out by EDP to analyze and follow up the request you have submitted.

To better assist you, we remind you that this contact channel is exclusively for reporting bad practices and/or doubts of an ethical nature, regulatory non-compliance and others provided for in the legislation approved by [Law no. 93/2021](#), of 20 December.

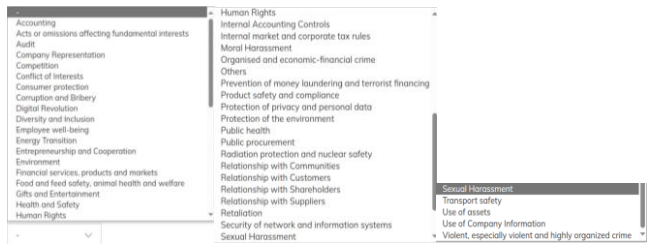
By clicking "Next" you will be directed to the contact form.

Select the concern you wish to contact us about.

I declare that I have read the [Privacy Policy](#) applicable to this channel.

Next

**Select your concern here!**  
In case your concerns are not specified in this list please click others



**The third step:** Read the privacy policy and click I declare that I have to read the privacy policy applicable to this channel.

Please note the following before registering a contact using this form:

1. EDP makes this channel available to all its employees, customers, suppliers and other stakeholders to report bad practices and/or doubts of an ethical nature, regulatory non-compliance, both external and internal, and the issues provided for in Law 93/2021 of 20 December.
2. All reports are directly addressed to the Ethics Ombudsperson and, when the matter is regulated by specific legislation, simultaneously reported to the Compliance Department.
3. EDP assumes the explicit commitment to protect the whistleblower, namely through unequivocal principles of non-retaliation against those who resort to this means in good faith and in a justified manner.
4. The confidentiality of complainants, whenever intended, is guaranteed by the security mechanisms of the information systems in use.
5. By submitting the online form, you must declare that you have read the privacy policy and that you are aware of the data processing carried out by EDP to analyze and follow up the request you have submitted.

To better assist you, we remind you that this contact channel is exclusively for reporting bad practices and/or doubts of an ethical nature, regulatory non-compliance and others provided for in the legislation approved by [Law no. 93/2021](#), of 20 December.

By clicking "Next" you will be directed to the contact form.

Select the concern you wish to contact us about.

I declare that I have read the [Privacy Policy](#) applicable to this channel.

Next

**Click here to read  
privacy policy  
and declare  
here!**



### The fourth step: click next to create request

Please note the following before registering a contact using this form:

1. EDP makes this channel available to all its employees, customers, suppliers and other stakeholders to report bad practices and/or doubts of an ethical nature, regulatory non-compliance, both external and internal, and the issues provided for in Law 93/2021 of 20 December.
2. All reports are directly addressed to the Ethics Ombudsperson and, when the matter is regulated by specific legislation, simultaneously reported to the Compliance Department.
3. EDP assumes the explicit commitment to protect the whistleblower, namely through unequivocal principles of non-retaliation against those who resort to this means in good faith and in a justified manner.
4. The confidentiality of complainants, whenever intended, is guaranteed by the security mechanisms of the information systems in use.
5. By submitting the online form, you must declare that you have read the privacy policy and that you are aware of the data processing carried out by EDP to analyze and follow up the request you have submitted.

To better assist you, we remind you that this contact channel is exclusively for reporting bad practices and/or doubts of an ethical nature, regulatory non-compliance and others provided for in the legislation approved by [Law no. 93/2021](#), of 20 December.

By clicking "Next" you will be directed to the contact form.

Select the concern you wish to contact us about.

I declare that I have read the [Privacy Policy](#) applicable to this channel.

Click here to  
move to create  
request

### The fifth step: Create request

Create Request

Anonymous

Click here if you want to report anonymous. If you click anonymous, you must not provide name, email, and mobile number.

Name (required) \*

Fill your name here!

E-mail (required) \*

Fill your email address here!

Mobile Number (required) \* ⓘ

(Select the Code) +84 for Vietnam ▼

Fill your phone number here!

Type (required) \*

(Select the Request Type)

Select your request type here! In case your concern is not specified please select others

Subject

Employee well-being ▼

Company

(Select the company in the EDP Group)

Select EDP company you have concern here!

Description (required) \*

Describe your concerns or suggestion here!

Attachments

Attach supporting evidence or documents for your concern here if any !

[Add Attachment...](#)

Please check the box below

I'm not a robot

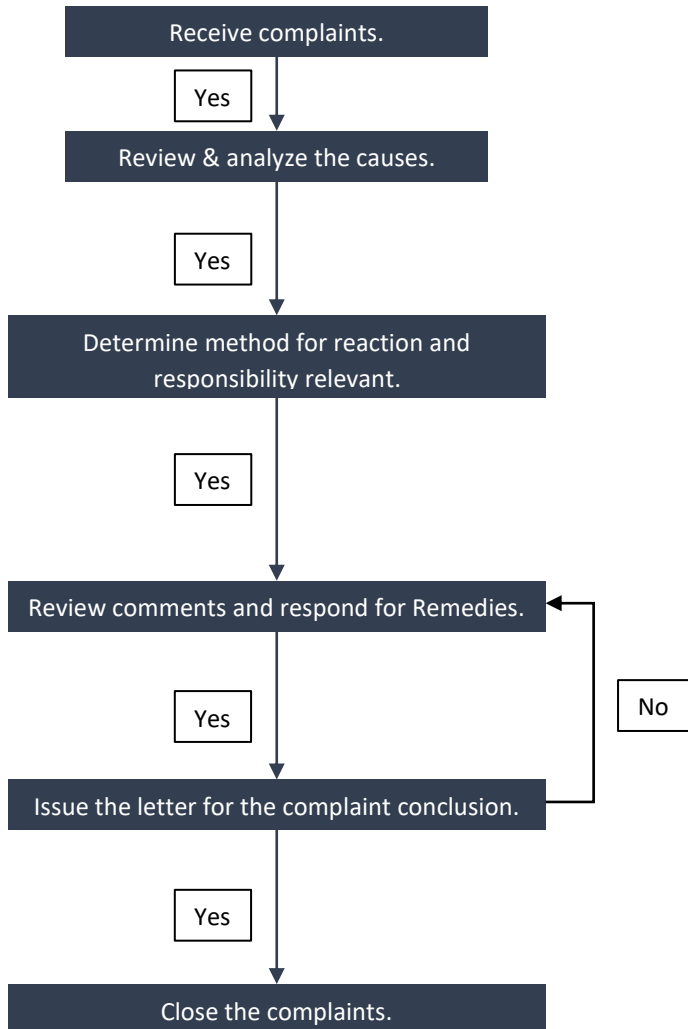


Click here for declare!

Submit

Click here for submit your concern/ grievance!

HSEMS – VN\_TI – HSE&S – 01/ANX-02 “Internal Grievance Mechanism Process at Project Level”



**I. IMPLEMENTATION STEPS.**

**Step 1. Receive request.**

- Receive complaints/comments from workers/ employees via verbal inform, letter, support phone number, text, email, etc...

**Step 2. Analyze the complaint.**

- For complaints/comments in person or by phone that have enough information, they can be resolved immediately, respond to complaints immediately;
- For complaints that do not have sufficient information or cannot be resolved immediately, do the following:

- Send a written response to the complaint within 04-05 days from the date of receipt of the complaint (for written complaints, email, phone...) or send the complainant a copy of the certified complaint receipt form received at the project;
- Transfer the complaint to the department/unit in charge of resolving the complaint.

**Step 3. Determine the cause and resolve the complaints**

- The department/unit in charge of resolving complaints coordinates with relevant units to determine the cause of the complaint;
- Propose solutions to competent parties.

**Step 4. Respond/resolve complaints**

- Prepare written responses to customer complaints or respond directly to complaints;
- Send relevant departments to fix problems that arise in complaints.
- Response to the complainant with remedies will not later than 30 days

**Step 5. Closing the complaint**

- Records; Summary and lessons learned.

**II. COMPLAINT RECEIVING INFORMATION**

	Name	Telephone No	Email
Project	Tran Thi Thu Lap	0971371200	<a href="mailto:Lap.tran@edp.com">Lap.tran@edp.com</a>
	Ha Thi Thu Nga	0939744161	<a href="mailto:Nga.ha@edp.com">Nga.ha@edp.com</a>
Vietnam	Luong Thi Thu	0914083650	<a href="mailto:Thu.luong@edp.com">Thu.luong@edp.com</a>

**III. RECEIVING AND HANDLING COMPLAINTS FORM**

RECEIVING AND HANDLING COMPLAINTS FORM			
Date			
Full name			
Department		Phone	
Complaints related issue			
Complaint receiver			
Complaint content			
Causes and remedies			
Implemented by		Date	
Result			
Checked by		Date	
Closed time			