Health, Safety and Environment at Vestas

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Foreword

With more than 35,000 employees, and suppliers and customers from across the globe, people are fundamental to our business. We strive to protect the environment and ensure the personal health and safety of our workforce, recognising that healthy business performance is delivered through healthy people and safe processes and equipment. We recognise that our success and our future require us to carry out our operations in a safe and environmentally conscious way.

In addition, credible and effective management of Health, Safety and Environmental risks is part of our Value Proposition to our customers. We therefore require a systematic approach to health, safety, and environmental (HSE) management in order to achieve continuous improvement in HSE performance. We achieve this through the proactive assessment of our HSE risks, in particular the effectiveness of controls aligned to such risks. Vestas strives to execute a risk management approach to improving HSE performance. Vestas needs to manage these matters as critical business activities, set standards and targets for improvement, and measure, appraise and report on our performance.



We also need to continually look for ways to reduce the environmental impact of our operations and services.

At Vestas, we have the Vestas Global Health, Safety, Environment (HSE) framework to implement an effective HSE management system to support our HSE Vision and Safety, Quality, Health, Environment (SQHE) Policy. The objective for the Framework is to create a consistent approach to HSE management across the organisation.

The success of our HSE culture is dependent on every individual and leader. Each of us has the responsibility to plan and implement actions to address risks and opportunities and to reduce or eliminate the environmental impacts of our activities.

We all have a part to play in:

- Managing our HSE risks systematically;
- Sharing and learning from our collective experiences in order to continually improve our HSE performance; and
- Being Ambassadors by promoting and driving a strong HSE culture.

In Vestas, we are all committed to:

- Protect the personal health and safety of our workforce;
- Protect the environment;
- Proactively manage current and emerging risks;
- Proactively assess the effectiveness of current and future controls;
- Use material and energy efficiently to provide our services;
- Understanding the needs and expectations of our customers and interested parties;
- Maintaining a quality-focused safety culture to ensure the highest priority is placed on the safety, efficiency, and reliability.
- Respect and contribute to the societies in which we operate;
- Share our HSE experiences – good or bad – with our employees;
- Place high priority on HSE matters in our business activities; and
- Promote and drive a culture in which all Vestas employees share this commitment.



01
Introduction to the HSE Framework

The Vestas Global HSE Framework outlines the key HSE requirements that each Region within the Vestas organisation shall incorporate in conducting their activities in support of this strategic direction.

This Framework sets minimum requirements for the development and implementation of an effective HSE management system in accordance with internationally recognised standards. Regions also consider the local legislative and other requirements.

1.1. Understanding the Context of the Organisation

To understand the needs and expectations of interested parties, the following provides a guidance on the interested parties (stakeholders) that are relevant to the Vestas Global HSE Framework.

At the global level, requirements of these interested parties that are relevant to the Vestas Global HSE Framework include:

- Protection of the environment;
- Legal compliance and regulatory obligations;
- Customer focus and expectations;
- Resource consumption, efficiency, and circularity;
- Industry best-practice;
- Effectiveness of the management of risk; and
- Supply chain management.

1.2. Scope of the Vestas Global HSE Framework

The scope of the Vestas Global HSE Framework are all activities delivering our services under our operational control. This also includes external suppliers/contractors that operate under our operational control.



02 HSE Governance

Health, Safety and Environment is managed at two levels:

- Global level (corporate); and
- Regional level.

At the global level, Health, Safety and Environment (HSE) has a strategic policy-making role. The function aligns organisational design and systems, drives strategic initiatives and change programmes, and supports the delivery of the Vestas business strategy and culture through an end-to-end customer approach. Functional HSE provides specialist expertise to Global HSE and the Regions, enabling the Regions to develop and deploy tactical plans that align with the global strategy. The day-to-day management of HSE is at the regional level, translating global objectives and activities in the Region.

At Global level, the policymaking and guidance is carried out by Global HSE. Its role is to establish global wide HSE policies and strategies, to develop value propositions for our customers, to facilitate HSE knowledge-sharing and to provide best HSE practice advice and coaching. In addition, its role is to have an overview of the Region and Functional management reviews, audit performance (planning and evaluation of the results) at Regional level and monitor the Key Performance Indicators established at Global level.

03 Roles, Responsibilities and Authorities

The primary roles and responsibilities are described below. The roles are simplified to ensure that the HSE management system can be used at all levels of our organisation. Company leaders are required to consult with non-managerial workers or their representatives. Leaders need to demonstrate that they are actively involved in the integration of the HSE Management System.

Management:

Responsible for Vestas and the business units (e.g., managers are responsible for legal entities, businesses, local businesses, projects, functions, etc.). They carry the responsibility and authority for implementing and maintaining the HSE Management System.

At a minimum, management is expected to perform the following:

- Be accountable for local implementation and maintenance of the HSE Management System;
- Demonstrate personal leadership;
- Create organizational accountability for the requirements of the management system;
- Assign resources;
- Ensure legal compliance and evaluation;
- Lead management reviews;
- Collaborate with HSE to determine and evaluate progress on objectives/targets;
- Monitor and report on implementation progress;
- Communicate HSE information to the workforce;
- Seek consultation and participation from workforce regarding the management system and HSE considerations;
- Ensure that the responsibilities and authorities for relevant roles within the HSE management system are assigned and communicated at all levels within the organization.

HSE Personnel:

Should have considerable understanding of ISO norms, HSE and operational business process management and interdisciplinary issues. HSE personnel are available to support Management in implementing and maintaining the HSE Management System. Personnel shall demonstrate HSE competence.

At a minimum, HSE personnel are expected to perform the following:

- Maintain existing ISO certifications;
- Assess operational HSE risks and aspects and facilitate proactive mitigation and controls in consultation with operations;
- Act as subject matter expertise for legislative compliance on all HSE matters at an operational level;
- Provide feedback through the functional lines within the Regions to identify opportunities for improvement;
- Draft, edit, update and control HSE Management System and control policies, manuals, procedures, and forms;
- Promote collaboration with the business, partnership, facilitation, and the driving of continual improvement;
- Ensure the HSE Management System documents are available for review by personnel;
- Provide incident and accident consultation and actions tracking;
- Provide NCR (Non-Conformities Reporting) oversight for internal and external audits;
- Schedule and coordinate internal and external management system auditing;
- Review HSE management of change processes against the requirements of the management system;
- Update legal registers at the country levels and document changes;
- Responsible for management reviews.

Operations:

Operations should have a working knowledge of the HSE Management system, operational and HSE business process management and interdisciplinary issues.

At a minimum, operations personnel are expected to perform the following:

- Comply with all relevant legal and customer requirements;
- Participate in change management cross-functional committees;
- Track actions for post incident, audit finding mitigation and initiatives;
- Consult and participate in job hazard analysis and risk profile development;
- Report incidents;
- Communicate issues to teammates;
- Provide feedback to management on functionality of the HSE Management system.

Support Functions:

Embedded in multiple areas throughout the global function and business units, the support functions' personnel must collaborate to complete goals and targets.

At a minimum, support functions personnel are expected to perform the following:

- Comply with all relevant legal and company requirements;
- Participate in change management cross-functional committees;
- Track actions for post incident, audit finding mitigation and initiatives;
- Consult and participate in job hazard analysis and risk profile development;
- Support compliance and management system auditing, when requested;
- Report incidents;
- Communicate issues to teammates;
- Provide feedback to management on functionality of the HSE Management system.

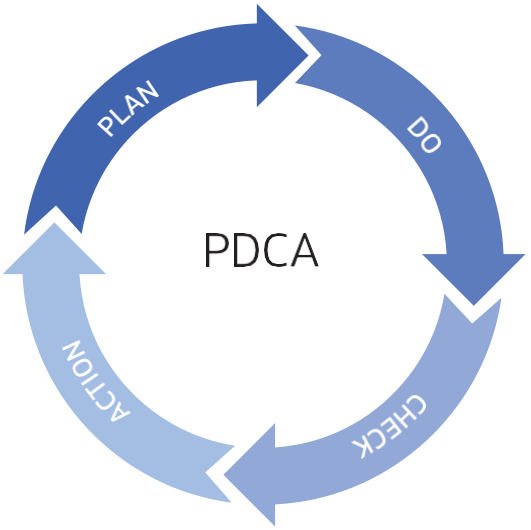
04
HSE Management Model

The Vestas Global HSE management model contains the following elements:

- Leadership commitment and worker participation;
- Planning including risk and opportunities identification, objectives, and actions;
- Operational planning and control of the globally identified high risk areas and significant aspects;
- Implementation and operations;
- Auditing, non-conformances, and corrective actions;
- Incident reporting and incident investigation;
- Performance monitoring;
- Management review;
- Documentation in support of the Global HSE Framework and any local / site-specific requirements.

These elements provide the foundation for a 'Plan, Do, Check and Act' approach to HSE management.

Vestas Global HSE management model





05
Leadership and Commitment

In Vestas, we manufacture, install, and service renewable energy solutions across the world to secure long-term sustainability of our planet. We are committed to protecting the environment by reducing carbon emissions in our own operations, enabling climate change mitigation, innovating circular business practices, preventing pollution to marine, water and other ecosystems and protecting biodiversity.

Our Safety, Quality, Health and Environmental policy provides the outline of our commitments and processes we adopt to improve our Quality, Health, Safety and Environmental performance continuously.

We report on our performance in the Sustainability Statement of our Annual Report.

Vestas Safety, Quality, Health and Environmental Policy



April 2024

Henrik Andersen

In Vestas, we operate renewable solutions across the world to enable a sustainable energy transition and secure long-term sustainability of our planet. We can only do this by protecting people and the environment. We strive to apply quality and sustainability in everything we do and by ensuring deliveries on time and at the right cost, we offer solutions and services that always meet or exceed our customers' expectations.

We all play a part in:

Customer Focus
We make Vestas an attractive partner and preferred customer choice due to premium quality and ease of collaboration.

Solutions and Services
We deliver sustainable energy solutions and services with high reliability and quality, and we are committed to reducing environm**ental impacts throughout their lifecycle. This includes prevention of pollution, continuous renewable energy deployment, resource efficiency initiatives** (i.e., **material, energy, waste and water) circular solutions and protection of biodiversity and ecosystems.**

Leadership and Implementation
We hold each other accountable, and true leadership and implementation means driving a culture where Safety, Quality, Health and the Environment are never compromised. Our leaders are expected to implement this policy, take action and lead through intent to empower our people to make safe and qualified decisions.

People
Our people are the driving force behind our success. We are committed to prioritize safety in everything we do and empower our employees through involvement, participation, consultation, and competence development with defined responsibilities, and provide the necessary resources, training, and support.

Process Approach
Safety, Quality, Health, and Environment (SQHE) is fully integrated in our end-to-end business processes. We adhere to processes and see them as the base for learning and continuous improvement.

Risks and Opportunities
We manage our risks and opportunities systematicallyand actively promote risk-based thinking and acting. We are committed **to pro-actively assess, identify, and mitigate Safety, Quality, Health and Environmental impacts, risks, and opportunities in all activities, at all levels of the organisation.**

Performance Management
We set, measure, monitor, and review our targets of SQHE performance and act upon deviations and customer feedback and ensure compliance to legal and other requirements. We make fact-based decisions using relevant tools systematically. We collaborate to identify and address root causes to prevent a recurrence and continually learn.

Partners and suppliers
We build strategic partnerships to evolve the renewable ecosystem and we collaborate with ou**r business partners, and s**uppliers in activities across the value chain and we expect the same performance levels **in all aspects of Safety, Quality, Health, and Environment as we expect from ourselves.**

Continuous Improvement
We are committed to achieve excellence in our solutions and services. We share lessons learned to maximize the impact and experience and to continually improve our performance.

Our policy is reviewed and approved annually by the Executive Management and applies to all Vestas entities, employees, activities, products, and services, including our expectations in relation to external parties such as strategic partners, suppliers and contractors and shall be used for setting SQHE objectives.

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06
Planning

6.1 Hazards and Environmental Aspects

Vestas has a systematic approach when identifying occupational health and safety (OH&S) hazards, environmental aspects and assessing associated risks, environmental impacts, and related opportunities. The scope covers all operations and activities performed by Vestas or managed through contractors under its operational control (Mode1 and Mode 2).

The systematic approach of managing HSE risks will aid to prevention of any incidents and losses to an organization. Any kind of activities in an organization involves HSE risks that have to be managed. HSE
risk management will guide us to make decisions by taking account of uncertainties and the possibility of future events.

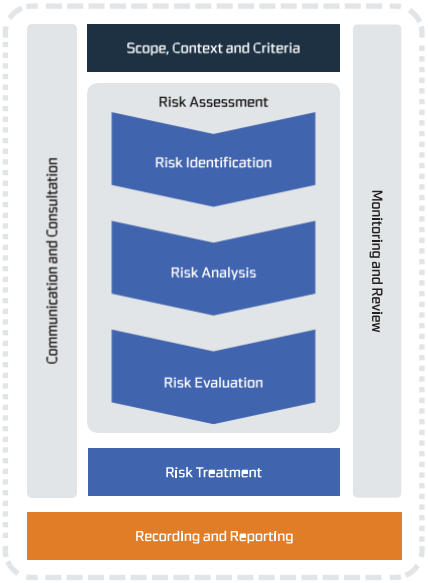
The following steps outlined in the HSE risk management procedure will ensure proactive risk management:

- Identifying, Assessing OH&S Risks / Environmental Impacts;
- Determining Significant OH&S Risks / Environmental Impacts;
- Mitigating /Controlling OH&S Risks / Environmental Impacts;
- Reviewing and Approving OH&S Risk assessments / Environmental Impacts;
- Assessing OH&S E Opportunities.

All risks must be eliminated or reduced to an acceptable level and in accordance with the Hierarchy of controls taking into consideration the technological and financial feasibility and to adequately match the risk level.

We must understand the hazards and environmental aspects that we can control and influence and their associated health and safety risks and environmental impacts.

HSE risk management



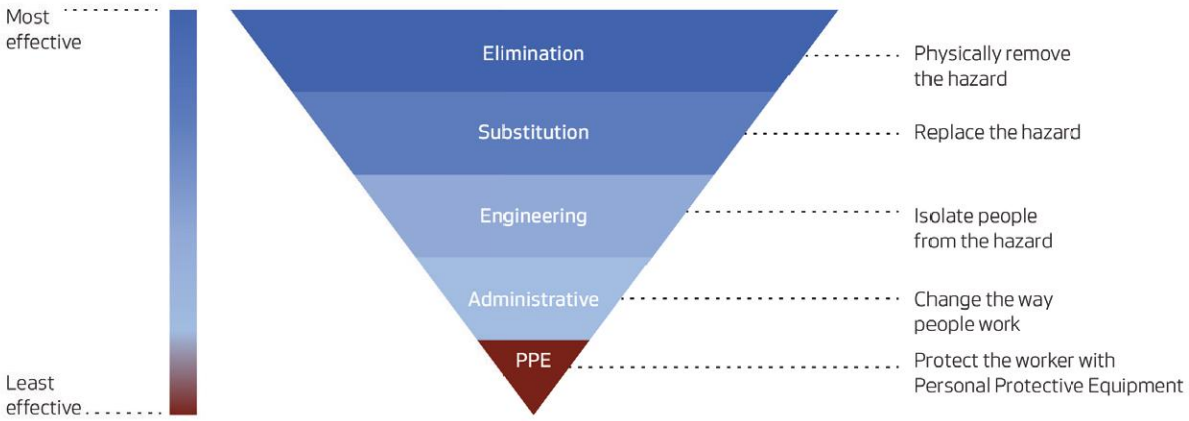
The risk assessments consider:

- The steps preceding and following the specified operations and process including abnormal conditions and foreseeable emergency situations;
- The design of work areas, equipment, materials, utilities, and surroundings;
- Procedures and the organisation of work;
- Changes, both permanent and temporary, to people, equipment, processes, software, and procedures;
- For environmental aspects, using criteria such as scale, severity and duration of impact, or type, size and frequency of an environmental aspect, legal requirements, concerns of external parties and life cycle perspective, to identify significant impacts;
- The implementation of control measures to eliminate or reduce the risks or impacts to an acceptable level taking into consideration legal and customer requirements;
- Communicating the risks and impacts and the assessments including the control measures;
- Documenting the risks and opportunities that need to be addressed.
- The identification of hazards or aspects, the assessment of risks and impacts and the determination of controls involve the people actually performing the activity and shall be documented.

- In considering control measures to reduce risks, the following hierarchy shall be used:

- Elimination;
- Substitution;
- Engineering controls;
- Signage/warnings and/or administrative controls;
- Personal protection equipment.

Hierarchy of controls



Product safety:

For safety in design of products, Vestas applies the strategy specified in the international and EU harmonized standard, EN ISO 12100 Safety of machinery - General principles for design - Risk assessment and risk reduction.

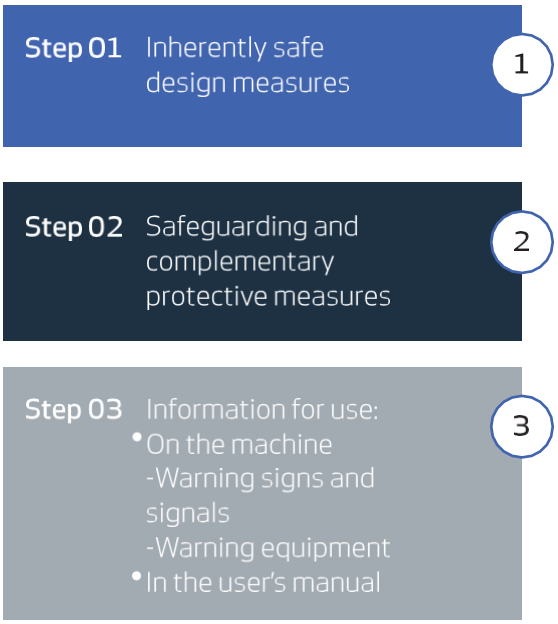
The standard specifies three different protective measures to achieve risk reduction:

1. Inherently safe design measure:
This measure aims to either eliminate or reduce the hazards by changing the design.

2. Safeguarding protective measure:
This measure aims to protect persons from the hazards that cannot reasonably be eliminated or reduced by inherently safe design measures.

3. Information for use protective measure:
This measure is in the form of instructions, signs, signals, training requirements, etc.

Protective measures implemented by designers



The inherently safe design measure corresponds to the first 2 levels, Elimination and Substitution, in the hierarchy of control model. Safeguarding measure corresponds to the third level, Engineering, and Information for use covers the two lowest levels, Administrative and PPE in the model.

The risk assessment process according to EN ISO 12100 is a hierarchical process that involves identifying hazards and estimating and evaluating risks during relevant phases of the machine life cycle. The standard specifies a methodology for design of safe machines and the application of risk assessment. Each protective measure should be assessed to ensure that adequate risk reduction has been achieved.
Vestas is committed to produce products that are safe for our own employees, customers and the surrounding society.

6.2. Vestas Environmental Principles

While establishing and implementing our HSE and Energy management system, the following environmental aspects, and their impact on our operations would be considered to reduce our impact on the environment. We are committed to manage material impacts, risks, and opportunities related to climate change, energy, circular economy, biodiversity and ecosystems, water and marine resources, and pollution prevention and control, and to conduct life cycle assessments on all our products.

6.2.1 Climate change

For Vestas, tackling the climate crisis is at the core of our business model, and we are committed to manage material impacts, risks and opportunities related to climate change.

6.2.2 Climate change mitigation

Vestas is committed to science-based decarbonisation of our operations and supply chain by 2030. We have a target of reducing GHG emissions in our own operations by 50 percent by 2030, and a target of reducing GHG emissions from our supply chain by 45 percent per MWh generated by 2030, both from a 2022 baseline. To achieve these targets, we will transition to renewable energy across our own operations and work with suppliers to reduce GHG emissions from raw materials, component manufacturing, and global transport. Key activities include exploring steps to reduce heating and transport-related GHG emissions from our operations, procure 100 percent renewable electricity across our operations, innovate our products to be more efficient and last longer, and engage with strategic suppliers to document, validate, and reduce the carbon footprint and improve the circularity of our products. Vestas will continue to work with life cycle assessments (LCAs) and primary supplier data to develop the understanding of our products and their impact and how best to mitigate environmental impacts throughout the turbine´s lifecycle.

6.2.3 Climate change adaptation

Vestas carry out climate change scenario analysis and risk assessments across our business operations to identify and adapt to possible climate change-related risks and opportunities, build internal agility and ensure resilience to climate change.

6.2.4 Energy efficiency and renewable energy deployment

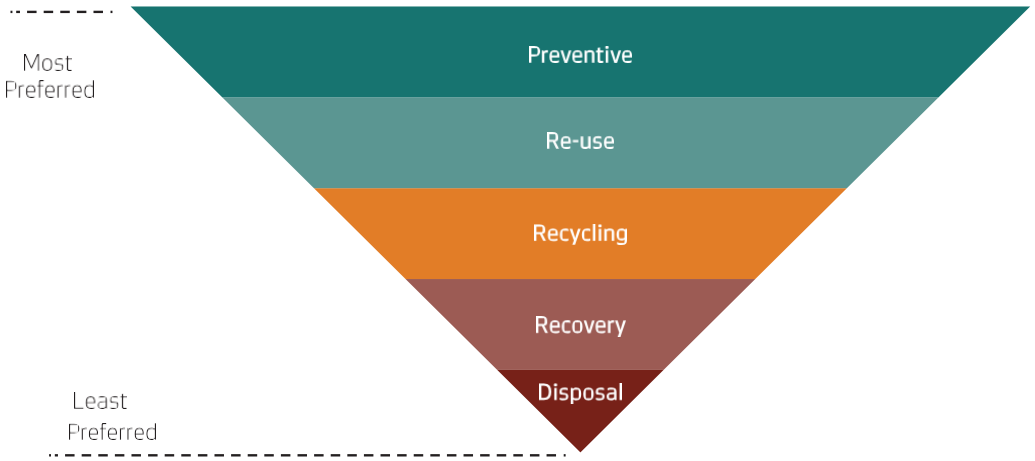
To limit energy consumption and facilitate the transition to renewable energy, facilities shall consider the requirements defined in Vestas Energy Management system and policies.

6.2.5 Circular economy

Vestas' long-term ambition is to produce zero-waste wind turbines by 2040. The ambition is anchored in our Circularity Roadmap, which is structured around three main pillars: Design for circularity, Operational circularity, and Material recovery. Vestas is committed to engage with external partners and suppliers to develop products that are durable, recyclable, and minimise harm to the environment, and in collaboration innovate the wind turbine value chain by creating circular business practices.

6.2.6 Resource inflows and outflows

Vestas works to conserve resources and avoid pollution of soil, water, and air. Our waste
management follows the principles of the EU waste hierarchy, aiming for waste prevention, re-use, recycling or recovery where possible. In purchasing of materials, Vestas aims to increase the share of recycled and renewable content where this aligns with broader environmental objectives.



6.2.7 Biodiversity and Eco-systems

Vestas is committed to protect and restore biodiversity and ecosystems throughout our operations, from project development, through the construction phase and during operation. Vestas is committed to identify, assess, and manage material biodiversity and ecosystem-related dependencies, impacts, risks and opportunities. We shall ensure that an environmental impact assessment (EIA) or screening has been performed equivalent to the standards of the EU for projects where applicable, and that we conduct impact assessments in line with best practice international standards to improve our understanding of the impact on biodiversity of our operations, and how best to mitigate that impact.

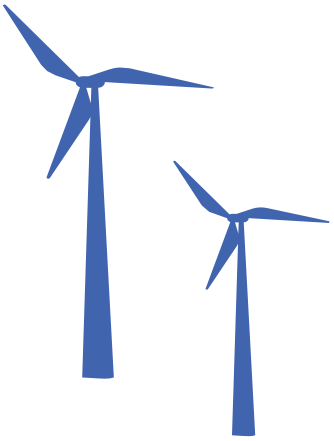
6.2.8 Water and Marine resources

Vestas is committed to reduce impacts related to water withdrawal and consumption and wastewater discharge. To ensure progress, Vestas establish processes, implement action plans and improve performance, supported by efficient equipment and technology. We manage water in accordance with local regulations across our sites.

Water consumption shall always be managed responsibly especially in regions where there is a risk of freshwater scarcity. When operating offshore, Vestas always follows applicable regulation to ensure any impact on marine resources is minimised.

6.2.9 Pollution prevention and control

Vestas is committed to eliminate, assess and mitigate negative impacts related to harmful substances, and pollution of air, water and soil, as well as promoting the use of non-toxic or less toxic
substances. We require our suppliers to fulfil the requirements set out in our Prohibited and Restricted Substances management document, which is used to regulate restricted or prohibited chemicals in all business levels and units at Vestas. The Vestas Prohibited and Restricted Substances management document is regularly reviewed and updated to reflect biannual changes in EU and international legislation, ensuring continued compliance



07 Operational Planning and Control

7.1 Compliance Obligations

Vestas is committed to comply with relevant HSE requirements. These are legal
requirements as well as other requirements that must be complied with in the jurisdictions in which we operate. Compliance Obligations can arise from mandatory requirements such as applicable laws and regulations, voluntary commitments such as organizational and industry standards, contractual relationships, codes of practice and agreements with community groups or non-governmental organizations.

At Vestas, we have a defined a process that includes the minimum requirements for identifying, evaluating, reviewing, and communicating HSE Legal and other requirements. Our legal obligations register is defined by the scope of our business context, i.e., where we operate and what our operational activities are.

Regions maintain a full registry of regulations relating to HSE (HSE Legal Register) which identify local
legal, statutory, and other requirements within their jurisdiction. All relevant changes in legislation and the actions taken against that changes are recorded in the HSE Legal register.

Compliance obligations



7.2 Customer Focus

As per our Leadership principles, Vestas is committed to provide customer focus and excellent customer service without compromising on health, safety, and the environment.

We systematically determine, review and, if necessary, investigate:

- Health, safety, and environment requirements specific to the customer;
- The risks and opportunities that can affect conformity of services and the ability to enhance customer satisfaction are determined and addressed;
- Customer demands, complaints, feedback, and satisfaction.





7.3 Contractual Arrangements

We ensure appropriate arrangements are made for HSE considerations in contract documents and other agreements with both customers and contractors/ suppliers;

In situations where the Region's HSE management system overlaps with the customer's management systems, that a bridging document is prepared and agreed to in order to identify and clarify gaps and overlaps in roles, processes and responsibilities.

7.4 Supply Chain and Contractor Management

Vestas' mission is to deliver best-in-class wind energy solutions and set the pace in our industry to the benefit of our customers and our planet. We set ambitious targets, and Contractors, subcontractors and suppliers to Vestas have a key role in ensuring that we achieve our goals. Along with a strong focus on safety and sustainability, it is crucial that quality is built into our entire value chain and always prioritized to prevent any compromise on performance or reliability.

The purpose of this HSE Contractor governance is to define HSE requirements for Vestas' contractors and their subcontractors providing services to Vestas operations. The Contractor Governance sets the goals and expectations and the terms and conditions to be met by the contractors in line with Vestas HSE Management system requirements.

As part of our governance, we:

- Evaluate and select contractors and suppliers based on their ability to supply the product or service according to specified requirements;
- Ensure that purchasing information shall contain sufficient detail regarding the product, process, or equipment;
- Implement a process to ensure purchased product or service meets specified purchase requirements;
- Implement a process for ensuring that non-conforming products or services do not enter the work process.

Contractors and suppliers and their employees are given site inductions to receive necessary HSE information (of both Vestas and customer). Access to sites is prevented until such has been completed.



At a minimum, the following topics are covered:

- Vestas Supplier Code of Conduct;
- Vestas Life Saving Rules;
- Customer specific induction training;
- Site specific health, safety and environmental standards and requirements including waste handling, spill prevention and other relevant environmental obligations;
- Emergency Evacuation Procedures;
- The hazards and risks associated with the site and work;
- The requirements for the supplier to undertake their own risk assessments accordingly;
- The required Personal Protection Equipment;
- Other planned or unplanned work that can impact the contractor/ suppliers' work;
- If the supplier procured by Vestas will carry out work that requires a Permit to Work (PTW) or Lock Out Tag Out (LOTO), Vestas will ensure that the Permit to Work or LOTO is issued and controlled as per the site's procedures and that the supplier provides risk assessments and method statements accordingly.



08 Implementation and Operations

8.1 Resources

Our HSE organisation is established to:

- Ensure the availability of resources essential to establish, implement, maintain and improve the HSE management system;
- Define, document, communicate and review the organisational structure, roles, responsibilities and authorities of personnel to implement the Region/Country's HSE policy and HSE management system;
- Have the right competencies in compliance with the Vestas HSE Competency and Capability Framework;
- Include HSE responsibilities in job descriptions and in performance appraisals

8.2. Training and Competence

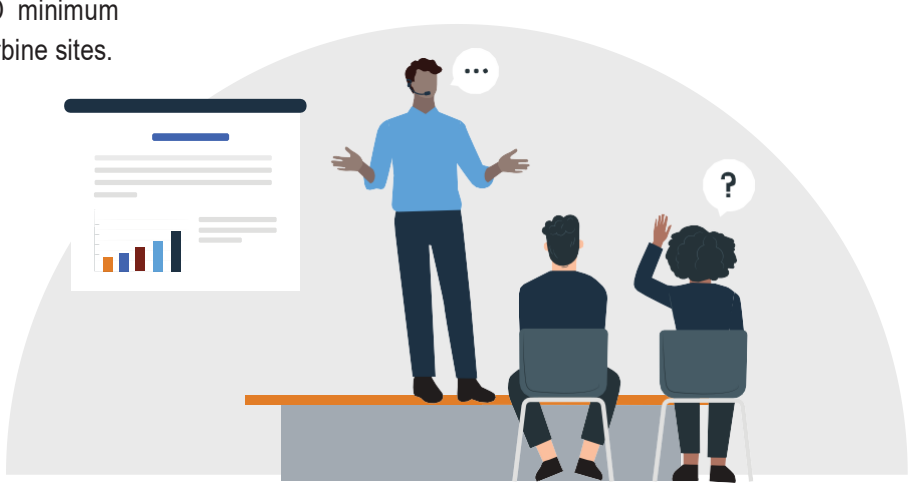
Training for Vestas Employees and Contractors is key factor to support for the implementation of HSE Management Systems with the objective to improve our people situational risk awareness.

Safety awareness induction for all persons working at Vestas and Global Wind Organisation GWO minimum requirements for personnel working at wind turbine sites.

We:

- Identify and document competence requirements to achieve their HSE objectives;
- Inform employees of:
  - the principles of the HSE policy and HSE management system;
  - their responsibilities in regard to HSE;
  - the ways in which their job activities may impact health, safety, and environment;
  - the actions they must take to achieve the HSE objectives and targets.
- Implement function specific HSE training programmes that include the following elements:
  - General HSE awareness training;
  - Job specific training, including identifying hazards and carrying out risk assessments, legal requirements, and consequences of non-conformance;
  - Emergency response training;
  - Technical training on practices necessary to mitigate health and safety risks and environmental impacts associated with operation and maintenance of equipment;
  - Environmental programme training, including training required under regulatory programmes, as applicable.

Training



8.3 Work Processes

It is important that there are clear processes on how we understand our activities to be carried out to ensure personal, operational safety and environmental protection. We have established our HSE Management system in levels:

- Global requirements for core processes and global requirements for high-risk activities;
- A Region, in addition to global requirements, develops and documents processes for activities where, based on a risk assessment, there is a significant risk.

8.4 Verification Planning

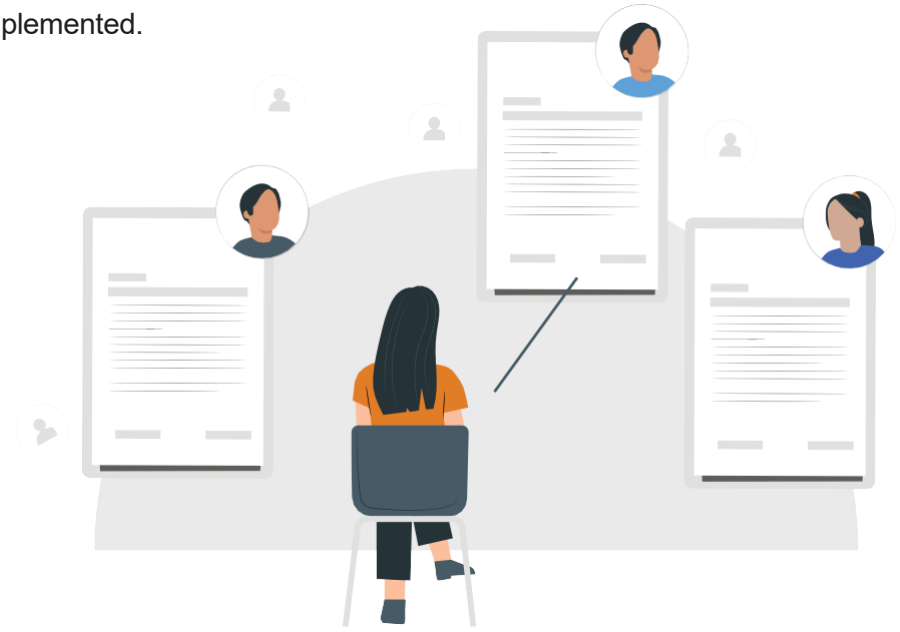
We perform verification planning such as periodic inspections is required to ensure that risk assessments are updated, the hazard levels are within acceptable levels, and control measures are implemented.

8.5 Management of Change

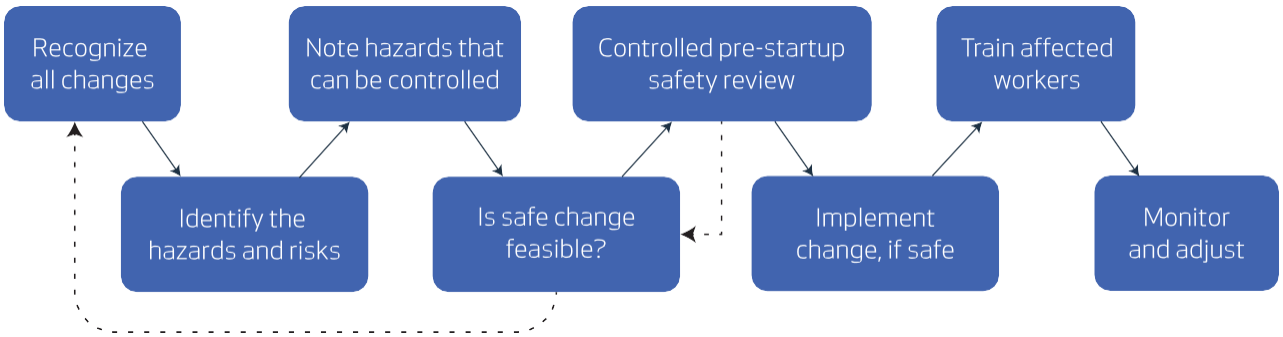
As part of management of change, we:

- Update risk assessments as part of the management of change process;
- Inform local authorities as appropriate;
- Document the proposed change and the implementation in order to demonstrate the above criteria have been met.

Periodic inspections of risk assessment



Management of change process



8.6 Emergency Planning

An emergency is a situation which poses a serious and immediate risk to health, life, or property, and requires urgent intervention.

Our workers often work in remote areas where professional medical help is a long way from them. Therefore, it is essential that each work area develops robust emergency response plans. They must be sufficiently detailed, capture the complexity of the site and cover all foreseeable types of incidents.

Preparing before an emergency incident plays a vital role in ensuring that employers and workers have the necessary equipment, know where to go, and know how to keep themselves safe when an emergency occurs. Regular emergency drills must be carried out on site to ensure ongoing familiarity and identification of any potential improvements.

We maintain emergency response plans and communicate these plans to all employees and contractors as appropriate.

Emergency response plans cover:

- The organisation, responsibilities and procedures for emergency response and disaster control, including the setting up of an Emergency Response Committee;
- Systems and procedures for providing personnel refuge, evacuation, rescue and medical treatment;
- The provision of suitably trained response teams based on the determined risks;
- Internal and external communications, including local and national authorities;
- Arrangements and procedures for mobilizing resources and emergency services.
- Emergency systems, plans, procedures and response teams shall be:
- Tested by drills and other means, at appropriate intervals;
- Revised as necessary in the light of the experienced gained.

Emergency response plan



8.7 Communication

We maintain processes for:

Internal Communication on:

- The HSE management system, hazards and aspects and the risk assessments including the control measures:
  - to various levels and functions of the organisation; and
  - to customers and contractors and supplier;
- Changes, both permanent and temporary, to people, equipment, processes, software, and procedures.

Communication is done through toolbox talks, HSE committees, town hall meetings, etc unit/location.

External Communication:

- which ensures that the recipient of an enquiry is identified, and that the enquiry is being replied and registered, if necessary, shall be established for each unit/location.

8.8 Participation and Consultation

The involvement of employees is crucial for achieving good standards of occupational health and safety (OH&S).

Consultation allows informed feedback to be considered by the organization before they make a decision. Participation enables workers to contribute to decision-making processes that affect OH&S performance. Feedback is dependent upon worker participation, and workers at all levels should be encouraged to report hazardous situations that preventive measure can be put in place.

At Vestas, the Health and Safety committees' governance outlines the framework for establishing the requirements for functioning of Occupational Health and Safety committees to ensure employee consultation and participation at different levels within the organization.

We have a 'Walk and Talk' programme that is a short (15-30 min.) tour around a department, a site, or any work area with the objective of having dialogue with the employees to demonstrate genuine care and enquiry by the leader to understand how our people work.

We have processes for:

- The participation of employees
  - in the policy process,
  - in the planning and operation processes,
  - in incident investigations,
  - in development of HSE objectives and targets;

- The consultation with employees and contractors where there are changes that affect their HSE.

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Communication, participation and consultation



09
Auditing, Non-Conformances and Corrective Actions

As a proactive part of the continuous improvement cycle, regular audits are conducted into the Vestas management system.

We:

- Establish, implement, and maintain an audit process addressing planning and conducting audits, determining scope of audits, audit criteria and methods;
- Establish and maintain an audit programme and carry out periodic audits of the HSE management system, in order to:
  - Determine whether the HSE management system is effectively implemented;
  - Identify areas for improvement, leading to continuous improvement in HSE management;
  - Record the strengths and weaknesses, positive organisational performance and any non-conformances, observations, and recommendations for improvement;
- Document findings from audits, investigate to identify root causes and develop an action plan in order to resolve them within a set time.

9.1 Non-conformances and Corrective Actions

We:

- Have processes for dealing with non-conformances by investigating their causes and taking preventive or corrective actions;
- Document and communicate the non-conformities and corrective actions taken including their effectiveness to relevant stakeholders including workers' representatives.
- Ensure that processes are in place to monitor non-conformances and track corrective actions to be able to review their effectiveness;
- Ensure that products that do not conform to control measures or product requirements, or are unsafe, are identified and controlled to prevent their intended use, or that appropriate corrective actions are taken;
- Ensure that non-conforming products are only released where after further sampling, analysis or other verification activities, the affected product is in conformance;
- Ensure that equipment that is not fit for use is identified and controlled to prevent its intended use.

Auditing



10
Incident Reporting and Incident Investigation

10.1 Incident investigation

To enhance our HSE safety culture and further reduce injuries and environmental impacts Incident management is one of the key elements that will help us to manage HSE incidents and implement appropriate measures in a systematic and effective way. It includes the following steps:

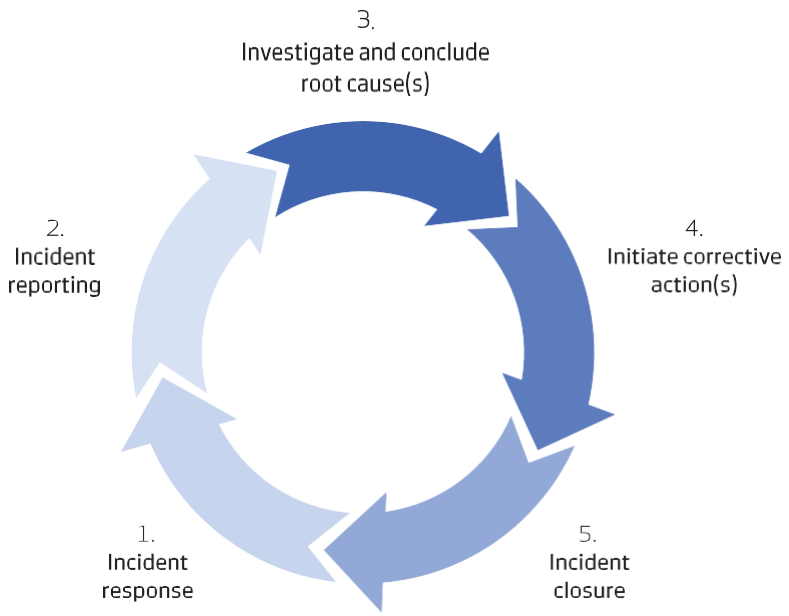
- to respond to an incident and mitigate its impact;
- report an incident including Health, Safety and Environmental context
- Investigate and determine root cause;
- Take actions to prevent recurrence.

We:

- Ensure that incidents and observations are clearly defined including assessment of their severity;
- Implement processes to ensure that all incidents, Near Misses and observations are reported in the Incident Management system so that the relevant lessons can be learned, and appropriate actions taken;
- Report incidents to regulatory bodies as required by law;
- Promptly report serious incidents to global level management as required;
- Document and communicate the incidents and corrective actions taken including their effectiveness to relevant stakeholders including workers' representatives.

The incident investigation involves the following steps:

- Ensure the correct classification of the incident (Actual and Potential severity);
- Ensure incident investigation, determining the root causes and preventive/corrective actions.



10.2 Root Cause Analysis

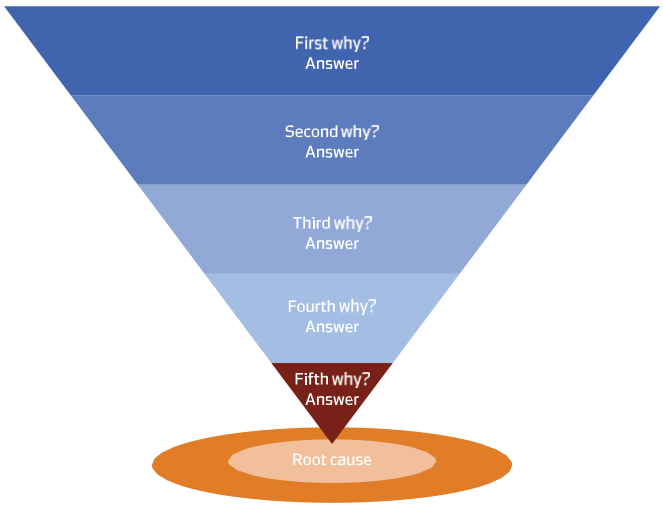
Root causes shall be determined using the 5 Why methodology.

We classify our root causes under 5 categories as below and each category has various systematic root causes which help in identifying the exact cause and corrective actions:

- Lack of or inadequate management control;
- Design;
- Lack of or inadequate procedures;
- Attitude and behaviour;
- External Factors.

For all identified root causes we develop a timebound corrective actions to ensure controls are implemented to prevent reoccurrence.

Root cause analysis



11 Performance Monitoring

In order to achieve HSE objectives and targets and improve HSE performance, a systematic approach is needed including the development and implementation of HSE action plans.

It is essential to report on key HSE parameters periodically to monitor our performance based on a global set of definitions and principles. The HSE reporting procedure:

- Provides reporting principles and rules to ensure a consistent basis for reporting Health, Safety, and Environment (HSE) key parameters;
- Sets the minimum Global standards for reporting definitions and processes;

- Defines the minimum requirements for internal and external reporting of HSE parameters;
- Includes the frequency of reporting, timelines and validations required;
- Specifies the data for monitoring performance and for reporting on HSE Issues.

We:

- Establish, implement, and maintain HSE objectives and measurable targets that:
  - are consistent with the HSE policy;
  - take into account applicable legal and customer requirements;
  - take into account the outcome of the assessment of risks and opportunities;
  - relevant to the conformity of services and enhancement of customer satisfaction;
  - are communicated; and
  - are documented.

- Develop and implement HSE action plans:
  - for achieving the Region's objectives and targets;
  - to address new or modified activities and equipment associated with significant potential health and safety risks, and/or environmental impacts;
  - to incorporate new or modified regulatory requirements.

Our HSE performance is reported on a quarterly basis along with the financial performance statement and annually in our sustainability report.

11.1 Monitoring

We:

- Monitor the extent to which the HSE objectives and targets are met;
- Identify Key Performance Indicator to be monitored;
- Maintain records that document the extent of compliance with its HSE policy and its arrangement for effective HSE management;
- Monitor evaluation of compliance with applicable legal requirements;
- Report selected HSE KPI (leading and lagging) regularly to regional management;
- If equipment is required to control, monitor or measure performance, establish, implement and maintain procedures for the calibration and maintenance of calibration equipment and for recording these activities and results.

Global and Regional HSE Heads measure and monitor the effectiveness of HSE controls through key risk indicators on a quarterly basis, and ensure that:

- Performance is reviewed to improve operations, efficiency, and delivery of objectives;
- Indicators cover all applicable HSE objectives (e.g., closure rate and aging of HSE action plans, number of inspections, reported incidents, compliance issues, trained staff, non-compliance with ISO certifications, nonconformities, and closure of actions);
- Trends (including trends arising from nonconformities) are analyzed and compared against objectives.

Performance monitoring



12 Management Review

A management review is a formal meeting that involves top management and occurs at different intervals throughout the year. The management review is necessary for operating an ISO-certified management system.

These meetings aim to assess the effectiveness of an organisation's Safety, Health and Environment management system.

We perform a management review once a year and ensure our HSE performance is reviewed for continuous improvement.

Management review covers all topics as required by ISO standards, the results of the meeting are documented and communicated to all stakeholders.

Management Review



13 Documentation

HSE Management System documentation is:

- Reviewed and approved for use by authorized personnel;
- Available and maintained in an organized fashion;
- Controlled and changes are clearly identified in each document;
- Latest revisions are made available at points of use;
- Obsolete documentation is removed from use and disposed of; or retained as per requirements;
- Records are maintained and stored as per the retention periods by authorized personnel, with identification for easy access and reference and safely disposed of when obsolete or separately retained as per requirements.

We:

- Maintain records providing evidence of conformity to legal and customer requirements and evidence of effective operation of the HSE management system;
- Maintain a documentation system that clearly indicates:
  - identification and description;
  - review and approval;
  - control of changes (e.g., version control);
- Maintain a system for the retention, storage and disposal of records as required by the HSE management system and law.

