

# Health and Safety Policy

*wpd GmbH*

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## 1. INTRODUCTION

The notion of sustainability and socially aware treatment of people and our environment are important to wpd GmbH (hereafter wpd). For that reason, wpd is not only contributing to the supply of green electricity and the energy transition towards renewables but also strives to ensure a safe working environment. We recognize that conducting our business activities should be accompanied by protection of the health, safety and wellbeing of our employees<sup>1</sup>, workers<sup>2</sup> and affected communities<sup>3</sup> near our offices, project sites, infrastructure, or transport routes who may face health and safety risks associated with our activities. Thus, we adopt health and safety management as an essential part of our business and comply with all applicable standards and requirements.

Our Health and Safety Policy (H&S Policy) represents the commitment made by us to manage occupational and community health and safety (H&S) risks and impacts across our offices and facilities, projects in development, and onshore wind farms and solar PV parks in construction and operation worldwide in a consistent manner. This policy applies to all our business areas, entities, subsidiaries and employees and workers globally, covering activities both at the corporate level and throughout the lifecycle of our projects. We actively communicate our commitment to H&S to all suppliers and business partners and expect them to uphold the same standards.

## 2. APPLICABLE STANDARDS

Our H&S Policy has been aligned with a range of applicable standards. These sources have informed the principles, procedures, and commitments outlined in this policy.

- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- International Labour Organization (ILO) Conventions
- EU Strategic Framework on Health and Safety at Work 2021-2027
- Voluntary Principles on Security and Human Rights
- Applicable national health and safety and labor legislation and obligations

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<sup>1</sup> A person hired by wpd. An Employee is also defined as a Direct Worker.

<sup>2</sup> Refers to a person engaging with wpd as a Direct Worker, as a Contracted Worker engaged through third parties to perform work related to core business, or as a Value Chain Worker.

<sup>3</sup> Local Communities directly or indirectly affected by a Project within the Area of Influence.

### 3. HEALTH & SAFETY COMMITMENTS

#### 3.1. Occupational Health and Safety

When it comes to ensuring occupational H&S of our employees and workers, we strive to operate in alignment with the following principles:

- Applying the highest standards of safe working environment, through implementation of occupational H&S measures, preventing work-related accidents, incidents and diseases through internationally accepted safety procedures.
- Ensuring clean and dignified living and sanitary conditions, as well as respecting rest time and working hours.
- Conforming with all applicable H&S standards and obligations.
- Developing and implementing adequate H&S management plans and procedures, including establishing safety as a priority, based on the hierarchy of prevention and control measures<sup>4</sup>.
- Requiring adequate and sufficient emergency preparedness and response plans from our contractors and suppliers.
- Keeping organized and documented records and procedures for reporting H&S related non-conformities, accidents, incidents, and occupational (work-related) diseases to monitor realization of our H&S objectives. This includes conducting a root-cause analysis for accidents, incidents and near-misses.
- Encouraging and enabling participation of our employees and workers into H&S management practices to raise awareness and improve H&S culture throughout our operations.

#### 3.2. Community Health and Safety

We commit to ensure the health, safety and wellbeing of local communities where we operate by adhering to the following principles:

- Raising awareness to our workers, contractors, and sub-contractors about adequate interactions with the local communities where we operate and expect the same from our suppliers and business partners.
- Requiring that our employees, our contractors and suppliers obey all applicable H&S standards and requirements and collaborate with local authorities for emergency preparedness and response and road safety. This applies to community H&S in all phases of a project (planning, development, construction, operation, and decommissioning of equipment and infrastructure).
- Ensuring that project infrastructures are designed and constructed in fully compliance with applicable safety standards.
- Implementing efficient traffic and transportation safety management regarding our operations to prevent incidents and accidents.
- Assessing and managing security risks as per applicable standards and ensuring the security personnel (if any) respect human rights and avoid any unlawful acts.
- Ensuring our activities and projects respect communities rights by adhering to United Nations Guiding Principles on Business and Human Rights (UNGPs) and promoting these values throughout the organization, specially to workers socializing directly with Communities.

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<sup>4</sup> 1) Avoid risks, eliminate hazards 2) Reduce, minimize hazards by technical measures  
3) Separate hazards from persons by organizational measures 4) Improve safe behaviour

## 4. POLICY IMPLEMENTATION

Occupational and community H&S aspects are managed across our operations under a H&S Management System as an essential part of our Environmental and Social Management System (ESMS) through the following elements.

### 4.1. Leadership and Commitment

Our managing board considers H&S as an integral part of our business activities, shows leadership and provides necessary sources for effective implementation of H&S. They support to create a H&S culture among the entire organization and business partners based on the results and improvement opportunities of monitoring and review.

### 4.2. Hazard and Risk Assessment

We believe that every incident and accident is preventable with a robust hazard and risk assessment in accordance with the hierarchy of prevention and control measures. Hazard and risk assessment starts during planning and development phase of the Project as a part of Environmental and Social Impact Assessments (ESIAs) and local legislative H&S related permits and approvals. Hazards are identified and risks associated with the hazards as well as potential emergencies are evaluated to determine prevention and control measures. All relevant parties' input (experts, workers, representatives, affected community members, equipment manufacturers and suppliers) is included in final analysis.

### 4.3. Risk Management and Control

Based on the defined control measures prioritizing elimination of hazards, H&S Plans, Emergency Preparedness and Response Plans (EPRP) and Traffic Management Plans (if applicable) are prepared. Those plans define working methods, procedures, instructions, emergency response actions, roles and responsibilities, incident/accident investigation, communication flow, training and drill requirements, record keeping, reporting and review. Contractors and sub-contractors are obliged to obey these plans by contractual clauses.

### 4.4. Communication and Participation

We enable communication and participation mechanisms for our employees and workers during hazard and risk assessment, as well as during development and implementation of the H&S related plans. We provide trainings to strengthen corporate shared H&S culture and commitment. Affected communities and, where applicable, other interested stakeholders are informed about H&S risks, impacts and controls via Stakeholder Engagement activities. We establish Grievance Mechanism for Workers and Communities in our projects where they can raise their concerns and demands.

### 4.5. Review and Reporting

We review the H&S Policy at least every 24 months or whenever a significant change occurs. The H&S management system, plans, procedures and other documentation are revised according to defined necessities and lessons learned to achieve continuous improvement approach. If any urgent revision is required to prevent a risk or comply with a new obligation, action is taken immediately.

Our ESG and Sustainability Department is responsible to routinely review this policy, monitor effectiveness of implemented measures and regularly provide updates on progress to wpd's leadership.

In the event of actual H&S impacts, wpd is committed to investigate the incident or accident timely by involving every internal and external party which is necessary to identify the root cause and prevent recurrences by taking all necessary preventive/corrective/remedial actions.

We share H&S related information as per local legislative obligations with the relevant authorities. Material health and safety indicators regarding with our own workforce, workers and affected communities will be disclosed within the scope of our Environmental, Social & Governance (ESG) framework.

Revisions of this policy must be approved by management.

Effective date: 08.2025

Signed by:  
  
 Björn Nullmeyer  
 Managing board / CFO  
 wpd GmbH

Version	Date	Originator	Review	Approval	Description
0	01.08.2025	ESG & Sustainability Department	Head of ESG & Sustainability Department	Managing board	wpd GmbH: Health and Safety Policy