



Windar renovables

Chemical substances management policy

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Statement

The European Green Deal constitutes the European Union's growth strategy, setting the course for becoming a circular and climate-neutral economy by 2050, establishing goals to protect human health and the environment. The EU thus lays out the path to combat pollution from all sources and move toward an environment free of hazardous substances. This path pioneered by the EU makes chemical substances the pillars for achieving low-carbon, non-polluting, and energy- and resource-efficient technologies, materials, and products.

In order to offer new solutions and support the economy's green and digital transition, it will be essential to advance the chemical industry's innovative capacity to provide safer and more sustainable chemical substances.

We can safely say that chemicals are present everywhere and in most of our activities today; among them are chemicals with hazardous properties that can harm human health and the environment. Hazardous chemicals are of concern, as some cause cancer, affect the immune, respiratory, endocrine, reproductive, and cardiovascular systems, weaken human resilience and responsiveness to vaccines, and increase vulnerability to disease. Therefore, exposure to these harmful chemicals constitutes a threat to human health.

Furthermore, chemical pollution is one of the key factors endangering the planet, as it amplifies crises such as climate change, ecosystem degradation, and biodiversity loss. Chemicals and materials must be inherently safe and sustainable, from production to end-of-life, so new production processes and technologies must be deployed to enable the chemical industry's transition to climate neutrality.

In this context, the WINDAR Group is a company committed to sustainability in all its dimensions and scope, with a special focus on fair and safe labor practices in the workplace, the health of its employees, and pollution prevention.

The objective pursued by the Governing Body is to promote the safe use of chemical substances employed at each of the sites where the WINDAR Group operates, minimizing the risks associated with their handling and, at the same time, encouraging the replacement of those substances that represent a high level of concern for human health or the environment with safer ones, thereby ensuring compliance with current regulations in all of the WINDAR Group's operations.

We seek to reflect our commitment to the identification, evaluation, control, and progressive substitution of hazardous chemical substances in all our activities. To this end, we have established principles of action for effective and safe chemical substance management, in accordance with current regulations and standards, particularly those relating to the European REACH Regulation.

This policy applies to all companies, locations, production processes, and products manufactured by the WINDAR Group, as well as to all suppliers and subcontractors who supply or use substances, mixtures, or articles containing hazardous chemicals.

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Commitments

WINDAR Group has established the following commitments:

- Prepare and maintain a complete inventory of all chemical substances used, stored, or generated at all locations and sites.
- Classify substances according to their hazard and their inclusion in the lists of substances candidate for authorization (SVHC) and restricted substances.
- Gradually replace hazardous substances with safer alternatives, especially those classified as carcinogenic, mutagenic or toxic to reproduction (CMR).
- Evaluate viable technical and economic alternatives for each identified substance of concern.
- Phase out substances of very high concern (SVHC) with defined timelines and annual monitoring.
- Do not introduce new SVHCs into processes or products without technical justification and a thorough risk assessment.
- Engage suppliers in compliance with the REACH Regulation, including registering the substances used, providing updated safety data sheets (SDS), and reporting SVHC substances in their supplies.
- Include contractual clauses that require suppliers to report any changes in the chemical composition of the products supplied.
- Ensure that the products supplied by the WINDAR Group to customers comply with REACH requirements (where applicable), including the absence of restricted substances and the correct communication of information on hazardous substances throughout the supply chain.

Principles of action

- Apply the precautionary principle in the management and use of chemical substances, anticipating risks and acting before they materialize.
- Communicate information about chemical substances to affected workers, customers, and stakeholders in a transparent, clear, and accessible manner.
- Train WINDAR Group personnel in the safe use of chemicals and in the interpretation of safety data sheets (SDS). The sheets will be available to employees at their workstations.
- Periodically review the policy and associated procedures relating to chemical substances to incorporate technical and regulatory advances and industry best practices.
- Provide workers with the necessary and appropriate personal and collective protective equipment (PPE) in all areas and processes where chemical substances are used, handled, stored, or transferred.



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Cumplimiento de la política

Compliance with this policy will be monitored by the Governing Body in collaboration with the corporate purchasing, occupational health and safety, and environmental departments. This will be achieved by conducting periodic internal audits, evaluating performance using key indicators (number of SVHCs eliminated, replacements made, supplier compliance), reporting on progress, and proposing corrective actions when necessary.

Failure to comply with this policy will result in appropriate measures applicable in each specific case, as well as a review of contractual relationships with suppliers, where appropriate.