

# HSE



## Environment, Health & Safety Policy

# Introduction

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TDF Group EH&S policy is underpinned by pinpointing operational risks in advance - primarily high-risk dangers, setting safety rules applicable to all (employees, customers, subcontractors, suppliers, etc.), ensuring the safety of infrastructures , improving labor conditions, protecting the environment, implementing training and awareness programs to prevent accidents and incidents, with an overall objective of « zero high-risk incidents ».

Risk management means setting up prevention measures, implementing collective and individual protective equipment, and monitoring sites and processes. This results every year in self-reinforcing continuous improvement via our close relations with the Health, Safety and Labor Conditions commission (French CSSCT), and an annual prevention plan that establishes actions to take and related objectives.



# EH&S Policy Strategies

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Our EH&S policy is underpinned by :

1. Personal health and safety
2. Safety of Infrastructures
3. Improving labor conditions
4. Protecting the environment



## 1. Personal health & safety

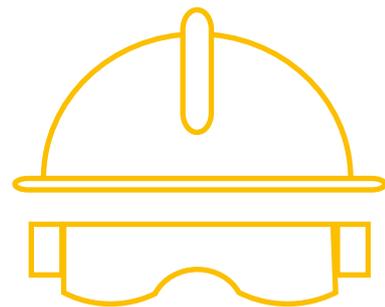
Our legal reference is our Individual Labor Risk Evaluation document, which details all risks, severity levels and frequency involved for all TDF jobs. We update this document every year liaising with the French Health, Safety and Labor Conditions (CSSCT) commission.

The policy for people's safety and actions aims to :

- **Apply collective prevention principles**, notably by evaluating unavoidable risks, to take collective protection steps and prioritize them over individual protection.
- **Prepare and provide training courses** such as preventing falls from a height, electrical risks, load handling, road safety and so on.
- **Establish and monitor TDF technician habilitations** (working at a height, electricity work etc.).
- **Monitor safety throughout the entire supply chain** (add EH&S criteria to general purchase terms & conditions, add EH&S performance indicators to contracts and apply penalties in the event of non-compliance and so on).
- **Identify and analyze on-site operational risks** (work or maintenance) joint inspection visits and draw up safety measures in a prevention plan. All site workers, including TDF customers and subcontractors, must abide by our prevention plan rules.

- **Ensure safety information is distributed to all TDF employees** (site access, site information, Pocket Safety Manual, emergency instructions, etc.) :
  - **Act quickly** : first-aid kits in vehicles, evacuation plan posters, training of voluntary first-aiders, how to use a cardiac defibrillator.
  - **Safety working at heights** : collective protection takes priority over individual protection. Interventions require two authorized and trained employees.
  - **Prevent road accidents** : set internal rules for vehicles (proper equipment and maintenance) and drivers (road accident prevention training, instructions).
  - **Electromagnetic field protection** : avoid exposure to levels above approved limits (field measures and relevant instructions, collective and individual protection).
  - **Lone worker safety** : set up a manual alarm plan in all vehicles for travelling workers, rank sites per operation type to allocate one or two travelling workers to jobs, lone worker alarm devices at some sites.
  - **Access security** : control of working teams, prevention plans for dangerous work, compulsory access requests prior to all interventions.

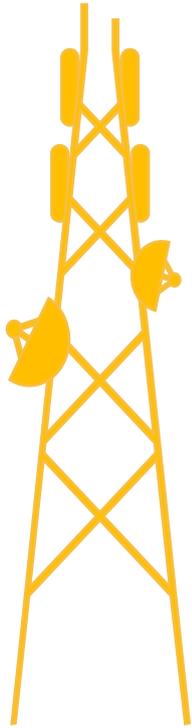
## 2. Safety of infrastructures



Specifications of facilities and equipment like masts, roof-terraces, electric installations and more, explain the main underlying rules. Periodic maintenance is carried out every year to check facility safety. Maintenance frequency varies subject to facility type.

Our EH&S policy aims to :

- **Prefer** :
  1. Rule out certain risks by dismantling equipment or replacing it with less dangerous equipment
  2. Factor in safety right from site or service design stage
  3. Turn to new, more reliable technologies to reduce interventions



- **Abide by compulsory periodic inspection deadlines to comply with regulations** (lifts, electric equipment, safety equipment and more) and take corrective action as necessary to comply.
- **Manage asbestos risks** : remove all friable asbestos and check non-friable asbestos conservation state.
- **Ensure aerial beaconing of facilities** : check system works properly, maintenance work, reporting procedure in the event of breakdown.
- **Prevent fire** :
  1. Carry out regular maintenance and renew fire detection system and automatic sprinklers at main network sites (fire protective equipment at other sites)
  2. Check fire permits
  3. Regular fire alarm exercises

### 3. Improve labor conditions



- **The CSSCT regularly reviews labor conditions and issues continuous** improvement plans to improve the Quality of Work Life for our staff, such as :
  - Improving work tools and latest IT resources
  - Analyzing and testing work duration
  - Reorganizing buildings and workplaces depending on business needs
  - Streamlining procedures
  - Sharing information and best practices when organizing work
  - Involving TDF staff and unions in picking and implementing new vehicles.

- **We focus on work/ life balance :** homework, moderate use of communication devices outside working hours.
- **Training courses are provided to raise awareness about mental health risks.**
- **A work stress helpline is manned 24/7.**

## 4. Protection of the environment



In addition to existing compulsory regulations, we strive to reduce our operations' environmental impact :

- **Air pollution :** halocarbon equipment replacement or substitution plans.
- **Soil and water pollution :** removing electric transformers running on PCB (polychlorobiphenyl) and destruction at treatment centers, investigations at sites located in sensitive environments, checked and banded fuel tanks.
- **Threats for neighboring inhabitants and nature :** environmental studies for new projects, equipment dismantling plans, noise level measurement at inhabitant property perimeter, review of how equipment blends in with surroundings for our sites located near listed buildings, environmental complaint management.
- **Listed environmentally hazardous equipment :** update statements of some operations pursuant to relevant safety guidelines
- **Waste treatment :** pick certified suppliers, prefer recycling.
- **Aerial beaconing :** functional checks, reliability improvement work, safety reporting in the event of breakdown.

# Organization

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Risk prevention relies on employee knowledge, involvement and awareness throughout the entire company. TDF directors and managers are in charge of distributing our EH&S values, as described herein, to their staff and ensuring all current safety rules are properly applied.

## 1. TDF department/ BU roles and responsibilities

- Executive Committee members have overall responsibility for EH&S policy compliance when managing their respective departments/BUs.
- TowerCo BU sets and coordinates the EH&S policy for the entire TDF Group and oversees implementation thereof.
- As delegated by TDF's CEO, Operations top management chairs the HSLC (CSSCT in French) commission, with the HR, Group-wide Processes Improvement, Engineering & Deployment, Real Estate & Facilities and Operations & Performance departments.  
The topics on the HSLC commission's meeting agenda are presented during each meeting and may, occasionally, be added to the works council committee agenda.
- The Engineering & Deployment and Real Estate departments, the TowerCo BU and the Operations division approve the annual labor risk prevention plan.
- Business Units and the Operations division guarantee operational conditions maintenance of the equipment they manage, based on preventive and corrective maintenance plans.

## 2. TDF EH&S action coordination

A national and regional EH&S team manages Group EH&S policy and produces an annual prevention plan with the HSLC commission and the other departments/BUs.

- **On a national level** : the EH&S-CSR department reporting to the Engineering & Deployment department is in charge of structuring the safety and environment rules, setting and updating the EH&S policy plus related instructions and rules, and overseeing the annual risk prevention plan by coordinating EH&S activities and reporting.
- **On a regional level** : a special EH&S team manages regional coordination of EH&S activities and reporting. EH&S managers in the Engineering & Deployment department ensure the safety of infrastructures , the protection of the environment and work with Operations to ensure personal safety.

### 3. TDF manager and employee roles

- Our managers are fully involved in risk prevention. They foster EH&S policy values among their staff by spreading awareness and setting EH&S goals. They distribute safety instructions to their staff, ensure proper safety instruction compliance and report all potentially dangerous situations to their senior management.
- Our employees and their unions are fully involved in EH&S topics. They have EH&S and HSLC representatives, who belong to taskforces and get involved in site audits and accident investigations. Local HSLC commissions, chaired by regional managers (for France) and by the Processes Improvement Director (for the Paris region and overseas), meet to discuss local EH&S issues and prepare for national HSLC commission meetings.



# EH&S oversight

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An EH&S management system run by the Engineering & Deployment department is implemented. It is aligned with ISO 45001 and ISO 14001 safety and environmental standards and is based on continuous improvement in liaison with all in-house and external stakeholders.

The system's main points include :

- **Active involvement in pinpointing and mitigating significant risks, largely based on regulatory compliant systems** (individual work risks evaluation document). In addition, significant environmental risks are analyzed proactively, and an accident & near-miss chart is updated monthly and reviewed quarterly by local HSLC commissions and the national HSLC commission, who is tasked with analyzing causes and investigation reports.
- **Implementing and tracking the annual risk prevention plan**, overseeing and monitoring monthly dashboard indicators with the HSLC commission.
- **Auditing site compliance** and safety rule application by TDF employees, subcontractors and customers.
- **Regulatory watch** by the Engineering & Deployment, Human Resources, Legal, Regulations and Communication departments.

# EH&S Communication

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Preventing risks, incidents and accidents primarily relies on employee information and training. TDF rules and procedures also apply to all in-house and external workers and subcontractors at all Group sites.



- **Site rules are communicated as follows, via :**

- A Pocket Safety Manual containing instructions
- Worksite operations and maintenance prevention plans
- Specific safety instructions that technicians can view on their smartphones
- Responses to customer and subcontractor access requests
- Staff safety news flashes
- Intranet and extranet.

Regular feedback from external and internal workers to share experiences and monitor action plans.

- **Training courses available :**

- Courses are based on training plans which are annually updated in line with staff requirements, which are formalized following employee-manager annual appraisal interviews.
- An IT system logs employee training and the EH&S team adds details.

# Should an incident or accident occur

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The EH&S team conducts detailed local investigations. All relevant details are entered into a national dashboard, which local SSCT commissions and the national HSLC commission review quarterly.

Should a significant or important incident occur, the general manager of the relevant entity takes all necessary steps. He or she informs senior management of Towerco, Operations, EH&S-CSR and HR departments, who in turn notify the HSLC commission. Local management should then take appropriate corrective action.





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