



proximus

Proximus Group Prevention & Protection

Proximus Group Environmental policy

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1. Objective and scope

Proximus Group wants to play a leading role in Belgium's green transition. At Proximus Group, we are committed to decreasing our ecological footprint. Our ambitions reach further than ever before: we will act across our entire value chain and will continue the transition towards a circular economy. On the one hand we act and reduce our own environmental footprint, and on the other hand we empower consumers, businesses, and organizations with our technological developments to make all our lives more sustainable and better for the planet.

As stated by the Proximus Code of Conduct, we all have a role to play to decrease the ecological footprint of Proximus Group. This document defines the policy on environmental compliance and sets out the different responsibilities.

In addition, the Proximus Group is committed to request its suppliers, agents, representatives, consultants, distributors, and other contractors (collectively referred hereafter as "suppliers and related third parties") to adhere to and comply with the principles set out in this Policy. To that end, the Proximus Group includes sustainability provisions in the agreements with suppliers and related third parties, especially when they are entitled to act as representatives of the Proximus Group.

This policy is of application for all employees within the Proximus Group. Proximus Group expects employees to comply with this Policy, even where local customs or practices conflict with this Policy. Where specific laws and regulations impose a different standard than contained in this Policy, employees of the Proximus Group must adhere to the more stringent standard. In case of doubt, they are required to seek advice with the Legal Department of Proximus SA.

2. Consequences of non-compliance

Violations of this policy may result in disciplinary action up to and including dismissal, in accordance with the employment regulation applicable to you.

Any negligence as regard to the strict application of this policy may have negative consequences for the Proximus Group and for the various people responsible in person (e.g., negative reputation, legal proceedings, severe penalties, external investigations, etc.).

Employees of the Proximus Group aware of any conduct inconsistent with this Policy are required to report these circumstances to the CPP SHE hotline. Any infringements of this policy will be punished in an appropriate manner, in accordance with the applicable provisions.

3. Compliance Control Monitoring Process

3.1 Follow up by Group Prevention and Protection (GPP)

GPP will execute ad hoc checks to assess if Group Policy is correctly applied within Proximus Group. The report of this checks will be reported to the Leadership Squad of Proximus SA, and the general management of the Company involved.

3.2 Compliance control monitoring process

- Compliance with applicable environmental regulations: checks on this can be carried out by government inspections and GPP checks.
- Limitation of the use of raw materials and avoidance of waste: checks on this are made by GPP through consultation by the subsidiary concerned when purchasing goods.
- Aiming for maximum energy efficiency and CO² reduction: this is checked by GPP through presence and adjustment in working groups and Steerco's with regard to the materials.
- Avoidance of the use of ozone-depleting products: this is checked by GPP through consultation of GPP by the subsidiary concerned when purchasing goods.
- Avoidance of the use of dangerous products: checks are made by GPP through consultation with the branch concerned when purchasing goods.
- Good neighbourliness: Proximus GPP investigates all complaints about possible (environmental) disruptions submitted by any parties involved. A follow-up register exists at GPP for this purpose
- Management of incidents: these must be reported to GPP and kept in a follow-up register together with the complaints (see above)
- Action plans and mandatory inspections: checks on these can be performed by inspections respectively by GPP and by the government.
- Working with contractors and share competencies, skills and training of employees: checks on this can be carried out by inspections from the government

3.3 Internal Audit

Internal Audit of Proximus SA can execute audits on this Group policy, on the request of the Internal Audit Committee.

Results of this Audit will be reported to the Leadership Squad of Proximus SA, and the general management of the Company involved.

4. Definitions

Proximus Group	Proximus Group comprises Proximus SA, its subsidiaries, joint ventures, and associated companies with over 50% shareholding as stipulated in the Proximus Affiliate Corporate Handbook.
Company	All concerned companies as described in the definition of Proximus Group.
Employees	Any contractual and statutory employee bound to a company of the Proximus Group, including temporary employees and students.
Employer	The company of the Proximus Group with whom the employee in question is bound by an employment contract or by law.
N+1	The hierarchical superior of an employee.
Leaders	These are the people that lead teams, divisions, departments and so forth, except for the person who is the employer. They all exercise a line position, such as line managers and coaches.
Leadership Squad	Formerly known as the Executive Committee of Proximus SA. The role is to assist the CEO in the exercise of his duties.
Board of Directors (BoD)	The BoD is composed of no more than fourteen members, including the Chief Executive Officer. The BoD defines Proximus' general policy & strategy and supervises operational management.
Environmental incident	Each incident linked to Companies' activities where these have affected the environment and/or third parties (e.g., neighbours) such as soil pollution, fire, explosion, ground or surface water pollution, air pollution, environmental nuisance complaints or infractions on legal obligations or other criteria determined by local legislation.
Serious environmental incident	An environmental incident due to fire, explosion, soil pollution, ground or surface water pollution or other criteria determined by local legislation
Hazardous substances	A hazardous substance is any material which can cause harm to you either directly or indirectly (EU (European Union) definition).

5. General principals

To ensure our environmental policy stays relevant and regularly updated, we follow these principles:

- We acknowledge that our activities, services, and products may have an impact – both positive and negative - on the environment.
- We regularly measure and communicate our environmental performance and track the progress towards the targets we have set in our annual report.
- As a very minimum standard the environmental legal requirements need to be respected. Where possible we go further than the statutory requirements. We anticipate upcoming environmental legislation.
- We follow all relevant environmental national laws and regulations in the countries where we operate.

- We strive to act in a socially responsible manner with citizens who encounter Proximus Group's activities. We engage in research, knowledge sharing and public policy with relevant stakeholders on topics that promote environmental responsibility.
- We sensitize and educate our employees regarding Proximus Group's objectives in the environmental domain.
- We identify the risks in our own operations and within our value chain, including relevant environmental matters (e.g., soil pollution, ground and surface water pollution, air pollution, waste production, noise and vibration nuisance, damage/pollution due to fire/explosion, use of non-renewable energy sources, use of raw materials)
- We apply the principles of circular economy: we partner with suppliers and related third parties to design our products and packaging in a way that uses as little material and energy as possible and makes it easier to reuse, refurbish or recycle afterwards.
- We strive to reduce our environmental impacts on all domains: carbon emissions, material usage, waste generation (hazardous & non-hazardous), energy consumption, hazardous substances, ozone-damaging substances, and water consumption, use of land and biodiversity...
- We educate our customers about environment and climate and offer solutions to reduce their own footprint.

Every Company within Proximus Group will conduct itself as a sustainable company by paying strict attention to the following:

1. Limiting the use of raw materials and avoiding the production of waste

A company will only be able to develop sustainably as far as it strives to minimize the use of raw materials. For this reason, each Company must make every effort to:

- Use materials and resources throughout all company activities as efficiently as possible and where possible, avoid and/or limit their use, reuse or recycle
- optimize the use of paper, e.g., by electronic management and exchange of documents, e-billing, videoconferences, etc.
- reduce the quantity of packaging for the products it purchases, as well as minimize the packaging of products it puts on the market

2. Striving for maximum energy efficiency and CO2 emissions reduction

The maintenance and further extension of the Proximus Group network and equipment requires large quantities of energy (such as electricity, gas, and fuel).

Proximus Group will take all the measures that are required to systematically improve its energy efficiency and to reduce its CO2 emissions with the ultimate goal of achieving the SBTi validated 2040 Net Zero target.

Proximus Group will define objectives to apply greener practices, to reduce its energy use and to limit the impacts of its activities on the greenhouse effect.

The Proximus Group will also offer climate and environmentally friendly products and services to its customers.

3. Avoiding and reducing the use of products that deplete the ozone layer and effect on global warming

For the air conditioning in its technical rooms and administrative buildings, Proximus Group will strive to use cooling systems in a responsible manner, both in terms of quantity and the choice of e.g., gases in these cooling systems.

Proximus Group aims to phase out the use of hydrofluorocarbons and replace them with more environmentally friendly cooling gases.

4. Avoiding the use of hazardous products

Hazardous products can lead to environmental damage or accidents that can injure our employees or third parties.

Proximus Group aims to reduce the purchase and use of all hazardous products, and if their use cannot be avoided, it applies the necessary safety and environmental measures.

5. Sustainable responsibility

Proximus Group strives, in the exercise of its activities, to treat every citizen, person, authority, ... who encounters Proximus Group with respect.

Therefore, Proximus Group makes the necessary effort to keep disturbances (sound, traffic congestion, etc.) caused by its activities to an absolute minimum.

Proximus Group examines every complaint about potential environmental disturbances filed by any impacted parties

6. Risk assessment

A risk assessment (RA) must be performed for each activity within the Company considering the following environmental risk domains:

- Soil pollution
- Ground and surface water pollution
- Air pollution
- Waste production
- Noise and vibration nuisance
- Damage/pollution due to fire/explosion
- Use of non-renewable energy sources
- Use of raw materials
- Biodiversity

On base of this analysis and assessment, risk reducing measures must be taken.

This risk assessment will be reviewed periodically (at least every 5 years) according to the obligations stipulated in the national legislation of the geographic location(s) where Proximus Group is doing business.

7. Incident management

Companies must analyse and record all environmental incidents linked to their activities where these have affected the environment and/or third parties (e.g., neighbours).

Serious incidents (explosion, fire, soil pollution, pollution of surface water or other criteria determined by local legislation) will be analysed in depth in collaboration with CPP. A report will be drawn up for these serious incidents.

8. Mandatory inspections

Certain periodic inspections of equipment/devices/installations must be executed according to national legislation by external inspection services.

Besides the legally required inspections by external parties, other inspections may be performed by the company that owns the equipment (e.g., to detect leaks of polluting products).

The Company, which is the owner of the equipment in question, is responsible for these inspections. The Company is also responsible for the practical organization of these inspections and the required follow-up of any shortcomings found. They must therefore inventory all the equipment that must be verified (such as inspections of cooling equipment, heating equipment, oil storage tanks, etc) conclude the contract ad

hoc, bear the costs arising from the inspections, etc. The inspection reports must be stored by the divisions and be kept available for auditing parties (authorities, Proximus Group auditors, ...).

9. Action plan

Action plans must be drawn up based on the Deming circle principle including the following phases: Planning of the actions (Plan), how executing the actions (DO), monitoring of improvement of environmental levels (CHECK) and adjust actions taken (ACT).

The risk reducing measures because of the Risk assessment, Incident management and Mandatory Inspections (see before) must be taken up in action plans.

If national legislation is not stricter, each Company draws up a 5-year action plan. This action plan must be published and communicated to all employees of the Company.

10. Working with contractors

If the Company relies on the services of contractors, the Company, as the principal (party commissioning the works), must comply with the national legislation and this Policy and must inform the contractor of the specific environmental rules applicable with the Company. For this reason, this Policy must be part of the contract between the Company and the contractor. For this reason, the principles of this Policy must be part of the contract between the Company and the contractor, this can be done by adding the Supplier Code of Conduct document.

11. Competence, skills, and training of employees

To carry out certain tasks or jobs the employees, including students and temporary staff, must have the necessary competences, skills, and training. Training must be foreseen by the Company. These trainings must be followed before the employee can perform the task. Important moments when these training should be followed: upon recruitment, in case of a job transfer or job change, in case of the introduction of new equipment, working methods or technology. If relevant for the job of the employee, special attention must be given to the following environmental domains: use of dangerous products, what to do with obsolete materials, information about preventing waste, recycling and re-using of equipment, etc.

6. Roles and responsibilities

- **All companies within Proximus Group** shall comply with this policy and local applicable environmental legal requirements. Therefore, each company involved will ensure that in carrying out its activities and the goods and services it purchases and/or provides comply with this policy and local environmental legislation. It will also assume the costs incurred in this regard. Each company must draw up a local environmental policy which must be in line with the Proximus Group policy and containing the same chapters as the Group Policy and describing the local environmental rules.
- **All members of the Leadership Squad of Proximus SA** and members of the management of a Company within Proximus Group are responsible for the communication and implementation of this Group Policy, and for the acquaintance and compliance of their employees with this Group policy.
- **All leaders** shall, during the performance of their duties, support the application and integration of the aspects included in this Policy, as well as in the environmental processes, procedures, and instructions of their division. They shall apply and respect these procedures and instructions and have them respected with their employees
- **The group Prevention and Protection (GPP) department of Proximus SA**, incorporates the Environmental department. GPP is responsible for the correct implementation, control, and update of this Group policy within Proximus Group. At the request of Leaders, GPP can provide support to help achieving compliance with the Environmental Group Policies & Procedures and/or to mitigate specific environmental related concerns. GPP provides guidance and assistance, but the final responsibility for compliance always remains with the employer or his delegate. This Environmental Group Policy shall be annually updated by GPP, with the support of the Sustainability Department of Proximus SA.
- **The Sustainability Department (STB) of Proximus SA**, is responsible for defining the long-term sustainability plan across its 3 pillars, being environmental, social and governance, ensure it is embedded into the business organisation, has the right means & priority in place to execute upon the plan, provides the business expert advice and follows up the implementation of it while measuring the achievement of its ambition & KPI's and report upon them through the Integrated Annual Report.
- The employee: comply with the procedures and instructions received

7. Governance

The respect of the legislation on environmental matters including this policy should be guaranteed by processes and procedures that are designed by each Company to ensure accountability, transparency, and sustainability (for instance: ISO14001 standard, The EU Eco-Management and Audit Scheme (EMAS), ...).

This Group Policy forms a part of a set of Group policies, which also include (non-exhaustive):

- Group policies such as the Proximus Affiliate Corporate Handbook, the Proximus Code of Conduct, the Proximus Supplier Code of Conduct, Anti-Bribery Policy, ...
- The Strategy and purpose of Proximus Group, the instructions for Proximus Group as approved by the Board of Directors, ...

This policy must be approved by the owner of this policy and the Chief Group Human Resources, as a Leadership Squad member.

8. Reporting

Proximus Group annually reports its environmental performance and progress in one integrated Annual Report. Proximus SA takes the lead in this exercise, with input of each Company.

The Company reports each semester on the following matters towards the Proximus SA SPOC (see under chapter Contact persons):

- All environmental incidents mentioned under chapter Incident management (see before): number of incidents, indication of type of incidents: soil pollution, fire/explosion, ground or surface water pollution, air pollution, complaints third parties due to environmental nuisance (noise, vibrations, fire, explosion...).
- At request: all other sustainability data, like CO2 reporting and circular economy reporting for the annual report, ...

The Company reports immediately on the following matters towards the Proximus SA SPOC:

- All serious environmental incidents in case of injured people and/or damage of company's goods and/or damage of Nature and/or damage of goods of third parties of more than 7,5k€.

The Company reports each year the status of its action plan towards the Proximus SA SPOC.