



proximus

GPP

# Well-being at work

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## 1. Objective and scope

This document defines the policy on well-being at work and sets out the different responsibilities. This policy applies to all employees of the Proximus Group (PLC and the subsidiaries with a Belgian location with more than 50% shareholding).

## 2. Compliance control monitoring process

- Legally required inspections of equipment, devices and installations: reference to the control reports are taken up in the monthly reports of the areas of the GIDPBW
- Prior approval by GIDPBW of all purchases of installations and personal protective equipment & work clothes: checks on this are done by GPP through consultation GPP by Procurement when purchasing goods.
- Temporary or mobile construction sites: safety coordination by appointed safety coordinator: to be defined
- Monitoring of compliance with safety instructions by the hierarchical line: checks are made by visits to the workshops by the line management and are part of the VCA system (safety management system).
- Periodic company visits by GPP and EDPBW: there is an annual planning for this and reports of visits which are presented at the LPCSW's or for the affiliates the CPBW's.
- Mandatory risk analysis for each work place: an overview list of the existing RA exists and is updated annually to identify which RA should be revised
- Annual safety and health action plan: is prepared and submitted annually at WOW and for the affiliates the CPBW's
- Mandatory job detail sheet for students and interim employment: are prepared by the the line management, human resources department and GPP. For this purpose, the human resources department contacts GPP. New sheets should be submitted at the WOW and for the affiliates the CPBW's.

## 3. Consequences of non-compliance

- Risk for Proximus: considerable negative consequences (negative publicity, legal proceedings, fines, external investigations,... )
- Risk for the employee: accidents at work or illness due to non compliance with safety instructions
- Violations of this policy may result in disciplinary action up to and including dismissal, in accordance with employment regulations

## 4. Summary

This document defines the policy on well-being at work and sets out the different responsibilities. This policy applies to all employees of the Proximus Group (PLC and the subsidiaries with a Belgian location with more than 50% shareholding).

Any negligence as regards 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 publicity, legal proceedings, heavy fines, external investigations, etc.).

All additional information can be obtained via the SHE Hotline ([sae.hotline@proximus.com](mailto:sae.hotline@proximus.com))

## 5. Legal framework

**The legislation on well-being at work can be found in :**

- the Law of 4 August 1996 on the Well-being of employees in the performance of their work, generally referred to as the "Well-being Act", and the implementing decrees of this law;
- the Codex on Well-being at Work, which consolidates all the new implementing decrees on prevention;
- the General Regulations governing Protection in the Workplace (RGPT-ARAB), which are gradually being replaced by the Codex on Well-being at Work. However, a number of sections of the former still apply.

The areas covered by the Well-being Act are:

- safety at work
- protection of the employee's health in the workplace
- the psychosocial aspects of work
- ergonomics
- occupational hygiene
- embellishment of the workplaces
- the measures taken by the company in relation to the environment, with regard to their influence on the aforementioned areas.

These areas are explained in more detail in Section 8. AREAS covered by WELL-BEING at WORK.

Definitions with regard to well-being at work can be found in the Well-being Act and its implementing decrees and on the website of the Belgian Federal Public Service for Employment, Labor and Social Dialog .

## 6. What is well-being at work?

Well-being is "feeling good at work" and is very important in our present-day society. It is obvious then that the Proximus Group should develop its activities with respect for all areas of well-being. We therefore regard the implementation of a well-being policy as an essential task that forms part of our general strategy and our company policy. After all, the well-being of every employee can contribute to the success of our activities and our company's performance

## 7. Responsibilities

### 7.1 Leading actors in the field of well-being at work

The "leading actors" are:

- The employer

An employer is the party to an employment contract in whose service another party, the employee, undertakes to perform work for a certain period of time under the authority of that employer.

At Proximus PLC, the CEO is the employer. In each of the group's subsidiaries, this is the CEO or managing director.

- The hierarchical line (HL): these are the people that lead teams, departments, divisions and so forth, with the exception of the person who is considered to be the employer. They all exercise a line position, such as line managers and coaches.
- The employee

Is an employee of the Proximus Group and also includes:

- temporary employees (= temping staff)
- student interns
- student temps

- The Common Internal Department for Prevention and Protection in the Workplace (GIDPBW) for the Proximus Group is the Corporate Prevention and Protection (GPP) service, which incorporates various safety advisors.
- The Committee for Prevention and Protection in the Workplace (abbreviated as GPPW) (at Proximus this is the **National Joint Labor Committee (JC)**.

In accordance with the trade union statute of Proximus PLC, the joint committee has set up a permanent national working group (Working Group on Well-being at Work, abbreviated as WOW) and Local Joint Committees for social negotiation and Well-being at work (abbreviated as LPCSW), which are tasked with preliminary discussion and follow-up of all areas of its employees' well-being in the performance of their work. National items are dealt with in the WOW, whereas items belonging to only a specific district are dealt with in the relevant LPCSW.

In every other entity of the Group, the Committee(s) for Prevention and Protection in the Workplace (CPBW).

- The **External Service for Prevention and Protection in the Workplace (ESPPW)**

## 7.2 Responsibilities

**The employer:** Each division, department, subsidiary, etc. pursues a well-being policy by drawing up risk analyses that are specific to its activity sector. It does so in cooperation with the GIDPBW and takes account of, inter alia, the development of working methods, the working conditions, accidents and incidents, and the recommendations of the GIDPBW and the Committees concerned. The actions to be taken as a result of the risk analysis and assessment will be incorporated in an action plan for the division, department or subsidiary concerned. The Risk Management Policy (only available in NL & FR) applies to that.

The division, department or subsidiary is also responsible for freeing up the required resources (collective and personal protective equipment (CPE & PPE), work tools (WT), instructions, etc.) and checking to make sure they are applied correctly.

Each division, department or subsidiary must ensure that the products it purchases and the goods and services it produces, meet the needs with regard to well-being at work. This means that all necessary safety precautions must be taken, both those which are legally required and those arising from Proximus own well-being policy. All costs related thereto must be taken into account by the division, department or subsidiary concerned in the cost price of the project, service or product in question.

**The hierarchical line (HL):** It must put the risk management into practice and, to this end, carry out global and annual action plans, each within its sphere of competence and at its level. In so doing, it analyzes and assesses the risks and takes the required measures to limit the risks to an acceptable level. It must inspect the CPE, PPE and WT (or have these inspected) on a regular basis and carry out checks to ensure they are applied correctly. In addition, it provides its employees with the necessary instructions and communication, and investigates the causes of accidents at work and takes the appropriate corrective measures to prevent such accidents. In this process it seeks advice from the GIDPBW.

**The employee:** is responsible for his/her own safety and that of his/her colleagues.

Helps the WG, HL and GIDPBW with risk management, undertakes to apply the prevention measures, and to comply with the instructions received.

**The GIDPBW:** the GPP is the driving force behind the well-being business in the Proximus Group. The GPP defines the common well-being policy (setting of objectives), works out the risk management, analyzes and assesses risks, and gives advice on all well-being issues.

Several safety advisors work within the GIDPBW. Their tasks are laid down in the relevant legislation.

The data of the prevention service can be found in chapter 9.

Important remark: The GIDPBW advises, initiates, motivates, trains, supervises and checks, but never replaces the hierarchical line or the employer.

**The CPBW:** the activities of a CPBW are laid down in the relevant legislation. It gives advice on, inter alia, the risk analyses and assessments, the prevention measures and the prevention plans. The organization of the activities of each Committee is determined in the internal rules and regulations. The activities of the WOW and the LPCSW's are determined in the statute of Proximus PLC.

The EDPBW: is in charge of health surveillance. The nature of its activities is determined by law. In consultation with the GIDPBW, it gives advice on, among other things, risk analyses and prevention measures.

## 8. AREAS within WELL-BEING at WORK

### 8.1 General

Well-being at work includes the areas mentioned in Section 5.

The following aspects form an integral part of the area of well-being

#### 8.1.1 Work place and work conditions

A risk analysis (RA) must be performed for each work place within the Proximus Group in accordance with the terms set out in Section 4.2 "Responsibilities" of this policy.

This RA results in general guidelines and specific instructions for the work places and work conditions.

The general guidelines on certain environmental parameters that must be respected (temperature, humidity, etc.) can be found on the intranet (WAP+) of GPP (Corporate Prevention & Protection) or on the affiliate's own intranet.

#### 8.1.2 Action plans

In accordance with the legal provisions, Proximus and each subsidiary draw up an annual safety and health action plan. These action plans can be consulted, respectively, on the intranet (WAP+) of GPP (Corporate Prevention & Protection), in the "Annual Action Plan" section) and on the intranet site of each subsidiary.

Other general actions can also be consulted on the intranet (WAP+) of GPP (Corporate Prevention & Protection).

These action plans and their contents are announced and put into practice via the intranet, mailings, the safety sites and the various toolboxes of the division, department or subsidiary concerned.

#### 8.1.3 Training/information

To carry out certain tasks or jobs the employee must have the necessary training. For example: climbers of pylons, staff operating lifting devices, etc. These training courses are given during working hours and the costs charged to the employees' division, department or subsidiary.

These training courses must be followed before the employee are allowed to perform the task; important moments when these training courses should be given: on recruitment, in case of a job transfer or job change, in case of the introduction of new equipment, working methods or technology.

#### 8.1.4 New employees

New employees, including student interns, temping staff and student temps, must receive an induction and guidance. To this end, Proximus has set up an appropriate procedure. You can consult it on the pages of WAP+/GPP

#### 8.1.5 Temping staff, student interns and students temps

When relying on temping staff, the Human Resources department and the department using the temps must fill in a job detail sheet, of which a copy must be sent to the GPP. Human resources department ensures that, after initialling for approval by the head of the GIDPBW, the job detail sheet and order form are provided to the temping agency.

The same principle applies to student interns and student temps; a job detail sheet must be drawn up.

#### 8.1.6 Mandatory inspections

The law stipulates that certain periodic inspections of equipment/devices/installations be made by the external technical inspection services.

Besides the legally required inspections, other inspections may be performed by the company that owns the equipment, such as ladders and fire-extinguishers.

The division, department, etc. concerned of Proximus PLC or the subsidiary concerned which is the owner of the equipment in question, is responsible for these inspections. The division, department or subsidiary 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, conclude the contract ad hoc, bear the costs arising from the inspections, etc.

The reports must be stored by the divisions and be kept available to the Inspectors of the Federal Directorate General for Monitoring Well-being in the Workplace (of the Belgian Federal Public Service for Employment). A copy of each report must be submitted to the GPP or made available by electronic means provided that access is given to this electronic application.

#### 8.1.7 Working with third parties

Proximus regularly relies on the services of contractors, both for works to be carried out on the telecom network and on the buildings.

To make sure that this work is carried out safely, for both the contractor's and its own employees, Proximus PLC/the subsidiary, as the principal (party commissioning the works), must comply with a number of legal obligations.

In general, one speaks here of "Working with third parties". Every contractor that works for the Proximus Group must comply with the legal requirements of the Well-being Act. Proximus PLC/the subsidiary must inform the contractor of the safety procedures that apply in the company.

The following documents apply: look here:

Preventive measures applicable at all times on Proximus' premises – working with third parties

You can find this document on the pages of WAP+ /GPP

### 8.1.8 Temporary or mobile construction sites

For temporary or mobile construction sites, safety coordination by an appointed safety coordinator is mandatory.

The safety coordination in the design and implementation phase must be coordinated by the department or branch concerned. Both internal and external coordinators are available for this.

The coordinator uses the three most important tools imposed by the legislation: the Safety and Health Plan (SHP), the Coordination Journal (CJ) and the *Post Intervention Dossier* (PID) for later interventions.

The SHP is included in all applicable (framework) contracts, of which it is an integral part.

Depending on whether they are works carried out under the authority of Proximus PLC/the subsidiary to manage and maintain the telecom network or GIS (engineering works), another procedure must be followed. More information about the procedure can be found on the pages of WAP+ /GPP.

## 8.2 Safety at work

The goal of safety at work is to prevent accidents at work. This mainly concerns the interactions between the technical installation and the employee.

### 8.2.1 Prevention policy

Every purchase must first be submitted to the GIDPBW for approval, so that the latter can formulate the necessary well-being specifications. It also examines whether the new installations meet the safety and health standards.

For more information, we refer to the text on the prevention policy on purchasing available on the intranet (WAP+) of GPP (Corporate Prevention & Protection)

### 8.2.2 Personal protective equipment

As laid down in the Codex on Well-being at Work, the prevention policy must strive to eliminate risks as much as possible or reduce them to an acceptable level. If this goal cannot be achieved and if all other measures (the organization of work, the working method and the collective protective equipment) are insufficient, personal protective equipment (PPE) must be used.

PPE can be ordered via purchasing systems. All personal protective equipment used must first be inspected and approved by the GIDPBW. The PPE must comply with European and Belgian legislation.

Employees are required to use the PPE they need to have based on the risk analyses and must adhere to the instructions they have received in this connection. The hierarchical line must ensure that this requirement is complied with.

In certain cases it is possible to obtain safety glasses with prescription lenses and orthopedic safety shoes. You can consult the procedure for Proximus Ltd on WAP+ /GPP pages.

### 8.2.3 Work clothes

Employees need to have special work clothing for some work places. These must be worn in accordance with the available instructions.

New work clothing must be submitted to the GIDPBW for prior approval.

The work places for which you need to wear work clothing and/or high-visibility clothing are detailed in the instructions of your division, department or subsidiary

### 8.2.4 Safety instructions

Every division, department or subsidiary is responsible for drawing up and disseminating the safety measures specific to its activity sector.

The general instructions (which apply to all employees) are set out on the intranet (WAP+) of GPP

The hierarchical line must ensure that these instructions are implemented.

The employees undertake to comply with them.

### 8.2.5 Hazardous products

Fire or other calamities can be caused by hazardous products such as gas, fuel, solvents, aerosols, etc.

At the divisional, departmental or subsidiary level, the prevention policy must meet at least all legal or regulatory provisions on the storage of hazardous products. GPP must be asked for advice whenever hazardous products are to be stored, used or purchased.

### 8.2.6 Accidents at work

Every accident at work occurring at Proximus PLC must be reported as quickly as possible on 0800/ALL HR (0800/25547). A separate procedure exists for the subsidiaries. This can be consulted via Human Resources/HR department of the subsidiary.

A work accident analysis will be performed by GPP.

In case of a serious accident at work, GPP will ensure it is reported as required to the Well-being at Work supervisory body or any other public authorities.

GPP is the sole point of contact with the Well-being at Work supervisory body with regard to reporting details about serious accidents.

For more information about the procedure that must be followed in case of serious accidents at work, see the instructions on WAP+ /GPP pages

## 8.2.7 Fire and evacuation

### 8.2.7.1 Fire safety

Fires and other disasters can pose a real threat to business and even endanger the company's continued existence. Prevention is therefore an absolute strategic priority for the Proximus Group.

Every member of staff must adhere to the "Guidelines in case of fire and evacuation" on the intranet

Fire-fighting equipment must be provided in accordance with the Proximus "fire standards", available on WAP+/GPP pages.

### 8.2.7.2 Reporting of defects

Defects in fire-resistant equipment, such as fire doors, openings in fire partitions, etc. must be reported immediately to the Facilities services in order to resolve these problems.

Fire extinguishers, hydrants and reels must not be moved without the prior consent of GPP and must be repaired or replaced immediately in case of a defect.

### 8.2.7.3 Fire-proof partitions

One of the measures to limit fire damage consists of dividing up the building into different compartments; in other words, groups or rooms which are closed off from each other with fire-proof materials such as walls, floors, ceilings and doors.

The best fireproofing measures are useless in case of injudicious actions (making holes in the walls, blocking fire doors, etc.).

For that reason it is prohibited to damage, perforate or replace such fireproofing components without prior approval from Group Internal Services (GIS). Fire doors may not be kept open.

### 8.2.7.4 Fire safety training

Fire extinguishing courses are organized in consultation between Proximus Learning Center and GPP.

### 8.2.7.5 Fire permits

Requesting a fire permit is compulsory both for internal staff and for employees of external companies.

A fire permit is not required for permanent work places where the employees in principle carry out the same tasks every day. However, a risk analysis must have been performed on a case by case basis.

NB: for works in splicing vaults, splicing rooms and crawl spaces, an exceptional procedure applies which is posted up on the access door!

These permits are valid for only one day. A permit applicable for several days may be issued for some long-term works in the same place.

For more information (including a list of representatives, how to request a permit, etc.), look on WAP+/GPP pages

#### 8.2.7.6 Evacuation

The evacuation procedures can be found on WAP+ Corporate Prevention & Protection in the section Fire and evacuation

In the event of an evacuation, the official instructions given on-site by GPP and the evacuation teams must be strictly followed.

#### 8.2.7.7 Evacuation exercises

GPP holds an evacuation exercise at least once a year. All subsidiaries and staff members are required to fully co-operate on this. Every employee must be aware of the importance of a regular evacuation exercise.

#### 8.2.7.8 First aiders

Based on a risk analysis, GPP determines how many first-aiders are responsible for providing first aid in which buildings.

The training and retraining courses are organized through Proximus Learning Center, which also manages the first-aiders database.

The first-aiders database can be consulted via the intranet (WAP+) of GPP or on the branch's intranet .

A reasonable reserve of first-aiders must be established in each department concerned, to be able to deal with all eventualities (transfers, retirement, etc.). To this end, GPP regularly issues a call within the departments to recruit new candidates.

The HL gives its support in this to reach the required quota.

#### 8.2.7.9 Emergency plans

For the agreements on this, please refer to the PERT process on the intranet. PERT stands for **P**roximus **E**mergency **R**esponse **T**eam.

## 8.3 Protection of the employee's health in the workplace

The employer must draw up a health policy for its employees.

In the Proximus Group, this is done by GPP in collaboration with Human Resources and the External Service for Prevention and Protection in the Workplace (EDPBW). The EDPBW mainly deals with health supervision: the medical checks. It also participates in company visits, to the WOW, LPCSW's and CPBW and, in consultation with GPP, gives advice on certain well-being aspects.

### 8.3.1 Health supervision checks

Depending on the work an employee does, he or she is exposed to specific risks and, based on those, may be subject to certain types of health supervision checks.

Every employee can check the health risks he/she is exposed to via the intranet. All employees, regardless of whether they must undergo the regular health check, can also consult a company doctor (spontaneous consultation). These checks are of course free of charge for the employees. More information is available on the intranet (WAP+) of Corporate Prevention & Protection.

### 8.3.2 Sudden indisposition

The employer is required to make the necessary arrangements to:

ensure that any victims of an accident or indisposition receive first aid and assistance from a doctor or a person able to preserve them from the dangers of complications and, if the circumstances require it, ensure temporary protection;

also ensure their transport, if necessary, either to their home or to a medical care facility.

The procedure concerned is available on the intranet (WAP+) of Corporate Prevention & Protection or on the affiliate's intranet.

### 8.3.3 Smoking policy

The legislation stipulates that it is prohibited to smoke in the workplace.

Smoking is permitted only in rooms specially partitioned off for this purpose. These rooms are well signposted and equipped with a smoke extraction or ventilation system that takes the smoke away to reduce the nuisance to a minimum. More information is available on the intranet (WAP+) of Corporate prevention & Protection or on the branch's intranet..

## 8.4 Psychosocial aspect of work

### 8.4.1 What is psychosocial well-being at work ?

Psychosocial well-being is a broad concept. A few examples of psychosocial aspects are stress, burn-out, harassment, undesired sexual behaviour and acts of violence at work.

The underlying idea is that your work should not have any adverse effects on your mental or physical health and that you can work in a more pleasant working atmosphere.

The employer must therefore draw up a prevention policy to prevent psychosocial problems at work and, if problems do arise after all, to pick up on and resolve them as quickly as possible.

## 8.4.2 Rules and regulations

In accordance with the Codex on Well-being at Work, Proximus has drawn up internal rules and regulations for managing individual requests.

On WAP+ or the affiliate's intranet you can get more information about this subject.

## 8.5 Ergonomics

Ergonomics strives to adapt the work to the employee so the latter does not suffer any adverse physical effects from the work.

### 8.5.1 Ergonomic equipment

The standard furniture and work tools available to employees comply with the standard ergonomic rules.

A modification of the standard equipment may be required for specific situations.

The employee will need to submit a request for this via the intranet (WAP+) of GPP or the affiliate's intranet.

The request will be examined (visit to the work station or a medical examination to determine what kind of special equipment should be purchased) by GPP and, if necessary, in collaboration with the External Service for Prevention and Protection in the Workplace. Once it has all the details, the division, department or subsidiary concerned or GPP will purchase the personalized equipment based on the recommendations made. .

More information is available on the intranet (WAP+) of Corporate prevention & Protection or on the affiliate's intranet.

### 8.5.2 Computer glasses

The employer must provide computer glasses for employees who do screen work regularly and for whom an eye examination prescribes this and if normal corrective tools do not address this.

More information is available on the intranet (WAP+) of Corporate prevention & Protection or on the affiliate's intranet.

### 8.5.3 Orthopedic soles

If the use of special orthopedic soles is medically justified, the employer will pay for the cost of purchasing orthopedic soles for safety shoes only. More information is available on the intranet (WAP+) of Corporate Prevention & Protection or on the affiliate's intranet.

## 8.6 Occupational hygiene

Good occupational hygiene in the workplace is required to ensure the well-being of the employees. The following aspects are part of good occupational hygiene:

Good social facilities, such as sufficient and clean bathroom facilities, appropriate dining areas, etc.;

Environmental factors such as the workplace dimensions, the workplace climate, for example sufficient, appropriate ventilation, appropriate lighting, and measures with regard to too high and too cold temperatures, noise and vibrations;

Limit the use of hazardous products such as chemical agents, carcinogenic and mutagenic agents, biological agents, asbestos, etc.;

Use and maintenance of individual equipment such as work clothes and personal protective equipment.

## 8.7 Embellishment of workplaces

Embellishment of workplaces relates to the layout and adaptation of workplaces. There are of course overlaps with psychosocial and ergonomic aspects, but also with safety and health. Aesthetic choices must be checked against safety and health implications. Glass doors and walls, carpets, harmful paints, etc. are just some examples of elements that can lead to problems. It is therefore necessary to always involve GPP beforehand when planning embellishment works.

## 8.8 Environmental issues

Through the permanent interaction between man and his environment, man's well-being is to a large extent dependent on the quality of his everyday surroundings. The environment in which an employee should work therefore plays a major role in his well-being at work: environmental degradation has an effect on the employee's well-being, such as the spreading of (environmentally) hazardous waste, contamination of the soil in which or on which the employee must work, air pollution, etc.

That is why, in performing its activities, the Proximus Group must put as little strain as possible on the environment and take measures to avoid soil contamination, limit air pollution, etc.

More information about this aspect is set out in the Environment Policy (see the intranet (WAP+) of Corporate Prevention & Protection).