Version 2.0

AXIAN TELECOM HEALTH-SAFETY-ENVIRONMENT-SOCIAL (HSES) POLICY

Purpose of the Policy:

Axian Telecom's mission is to create a positive and sustainable impact on the greatest number of people through its activities by being an actor and accelerator of financial and digital inclusion.

Axian Telecom's environmental and social responsibility, which includes environmental issues, workers' rights, health, safety and security of employees, customers, contractors and communities, is of increasing importance to our stakeholders and must be an integral part of Axian Telecom's policy and contribute to its economic performance.

Axian Telecom, and its subsidiaries, are committed to the effective implementation of an appropriate HSES management system to manage their HSES responsibilities and performance, which will deliver on the commitments contained in this Policy.

1. Scope of Application of the Policy

This policy applies to all Corporate and Subsidiaries 'employees, contractors, suppliers and visitors.

2. Reference Framework

Our HSES policy and approach are based on:
- Host countries legal and compliance requirements
- International Finance Corporation's Environmental and Social Performance Standards[1]
- World Bank Group's General and Telecommunications Specific Environmental, Health and Safety Guidelines[2]

In the conduct of our business, we commit ourselves, our employees, our partners, our suppliers, and our customers to:

3. Environmental impacts and occupational health and safety

- Comply with all applicable national and international environmental laws and regulations and, in the absence of such regulations, apply industry standards in a responsible manner;
- Integrate HSES requirements into routine operational frameworks and in the design, construction, operation and decommissioning phases of new projects;
- Avoid, to the extent operationally and financially feasible, installation of new towers in areas that can negatively impact Alliance for Zero Extinction (AZE) or UNESCO World Heritage Sites[3];
- Ensure that contracting of services, the purchase, hire or lease of equipment and materials, as well as all other activities with contractors, are carried out so as to minimize any adverse HSES consequences and, where possible, to enhance community development opportunities;
- Adopt a zero-tolerance approach to the possession, purchase, exchange or collection of legally protected and/or threatened wildlife and forest species;
- Identify, assess and appropriately manage the health, safety, environmental and biodiversity risks associated with current and future activities that could affect staff, customers, contractors and communities and any other identified stakeholders in line with the Reference Framework;
- Put in place adequate corporate and site-specific emergency preparedness and response measures to ensure timely and appropriate intervention in case of emergencies;
- Encourage and support our partners with regards to the application of our health, safety, environmental and biodiversity protection rules and consider their implementation as a criterion for their assessment;
- Assess and prevent accidents and incidents where reasonably possible;
- Communicate to new employees, contractors, suppliers, partners and visitors the HSES rules and their purpose;
- Provide adequate training, supervision, tools and information to ensure a safe and healthy workplace for all employees and stakeholders;
- Investigate, record and communicate all incidents

---

[1] The 8 E&S PS of the IFC
[2] World Bank Group EHS Guidelines
[3] https://whc.unesco.org/fr/list/

4. Resource consumption and pollution prevention

- Take feasible and cost-effective actions to improve efficiency in our energy consumption and measure, monitor and reduce our greenhouse gas emissions;
- Adopt recognised best practice in waste management, implement a coordinated waste reduction strategy and raise awareness of the issue among our internal and external stakeholders including the contractors and suppliers;

5. Stakeholder engagement and grievances mechanism

- Respect the different cultures, traditions and rights of communities in accordance with applicable regulations and local and international best practices;
- Effectively communicate and consult with local communities and stakeholders with a view to fostering mutual understanding and shared benefits through the promotion and maintenance of open and constructive dialogue and working relationships;
- Maintain a transparent and effective communication mechanism for resolving grievances related to our operations, accessible to all our employees, contractors' employees and the communities surrounding our operations;
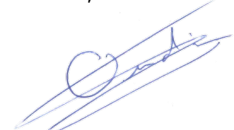
6. Monitoring and reporting framework

- Ensure that HSES performance and systems are regularly monitored, audited and reviewed by management to identify new risks, measure progress and trends, assess compliance, communicate issues and drive continuous improvement.
- Translate the stated commitments into objectives and actions through a management programme relating to the identified health, safety, environmental, biodiversity and social risks.
- Disclose HSES performance annually through the impact report or other required format.

7. Resources

Axian Telecom is committed to provide the necessary resources, both human and financial, at both corporate and subsidiary level to ensure the effective monitoring and implementation of this policy and the related HSSES Management System.

At corporate level, the Impact & Sustainability Manager is responsible for ensuring compliance with and adherence to this policy and for implementing the HSES Management System.

Mauritius, March 10th, 2023

Stephane Oudin
CEO Axian Telecom