

HEALTH SAFETY ENVIRONMENT SOCIAL (HSES) POLICY

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Distribution

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AUTHORISATION

	Name	Title	Signature
Approved By	Hassan Jaber	CEO Cluster Telecom	
Policy Owner	Daniel UDOCHI	Chief Risk & Compliance Officer	

Table of contents

1.0	Purpose	3
2.0	Scope.....	3
3.0	Reference framework.....	3
4.0	Policy statement.....	3
4.1	General commitment.....	3
4.2	Health and Safety.....	4
4.3	Environmental impacts	4
4.4	Resource efficiency and pollution prevention	4
4.5	Climate action	5
4.6	Stakeholder engagement and grievances mechanism	5
5.0	Monitoring and reporting	5
6.0	Responsibilities	5
7.0	Review date.....	6

1.0 Purpose

At AXIAN Telecom, we aim to create a positive lasting impact by advancing financial and digital inclusion. Health, Safety, Environment, and Social (HSES) responsibility - including environmental stewardship, workers' rights, and the safety and well-being of all stakeholders — is central to our values and essential to our business success.

This Policy affirms AXIAN Telecom and its subsidiaries' commitment to a robust HSES Management System to uphold these responsibilities, drive continual improvement, meet our obligations. This policy is aligned with AXIAN Telecom's overarching strategy and takes into account both internal and external factors.

2.0 Scope

This policy applies to all AXIAN Telecom Group employees, subsidiaries, customers, suppliers, and visitors across our operations.

3.0 Reference framework

Our HSES approach aligns with:

- Host country laws and regulations
- IFC Environmental and Social Performance Standards
- AFD Group's Exclusion List
- World Bank Group EHS (General and Telecommunications specific) guidelines

4.0 Policy statement

We commit to embedding HSES principles across all operations and expect the same from our partners and stakeholders.

4.1 General commitment

AXIAN Telecom is fully committed to upholding high standards of health, safety, environmental, and social (HSES) performance. To this end, we will :

- Comply with all applicable national and international HSES laws and regulations. Where gaps exist, we will apply responsible industry best practices.
- Identify, assess, and manage HSES risks across all activities.
- Establish and maintain emergency preparedness and response systems, at corporate and operational levels.
- Promote responsible practices among partners and suppliers.
- Prevent incidents where reasonably possible, and ensure timely reporting, investigation, and communication of lessons learned.
- Integrate HSES requirements into operations and project stages - design, construction, operation, and decommissioning.
- Communicate HSES expectations clearly, via awareness campaigns and workshops, and especially during onboarding and site access to all employees, contractors, partners, and visitors.

4.2 Health and Safety

We are committed to a safe and healthy work environment. To this end, we will:

- Integrate health and safety across supplier selection and engagement, from selection to execution.
- Foster employee participation and a culture of dialogue and shared responsibility.
- Provide policies, processes and procedures, trainings, tools, supervision, and resources for safe operations.
- Continuously monitor and improve safety performance guided by recognized industry standards and best practices.
- Cultivate a prevention-first culture where safety is a core value.

4.3 Environmental impacts

We recognize the importance of protecting the environment and are committed to minimizing our environmental impacts by:

- Avoiding, to the extent operationally and financially feasible, installation of new towers in Alliance for Zero Extinction (AZE) or UNESCO World Heritage Sites.
- Ensuring procurement practices reduce environmental harm and support local community development.
- Enforcing a zero-tolerance policy for illegal wildlife or forest product trade in compliance with national laws and international conservation standards.
- Ensuring that growth and acquisitions are supported by adequate resources at both subsidiary and corporate levels to properly identify, assess, and mitigate biodiversity impacts.

4.4 Resource efficiency and pollution prevention

We aim to reduce our environmental footprint through:

- Cost-effective energy efficiency measures.
- Promoting circular economy practices: reuse, refurbishment, and sustainable sourcing.
- Adopting best-in-class waste management practices and raising awareness among stakeholders to foster collective responsibility.

¹ The 8 E&S PS of the IFC

² <https://www.afd.fr/en/ressources/afd-group-exclusion-list>

³ World Bank Group EHS Guidelines

4.5 Climate action

We are committed to science-based climate action. We will :

- Measure and reduce greenhouse gas (GHG) emissions in line with global standards and SBTi targets, and transparently report progress.
- Increase renewable energy usage.
- Develop and implement a climate transition plan through 2030.
- Integrate climate risk into business strategy and build internal capacity.
- Avoid climate misinformation or lobbying against environmental regulation.

4.6 Stakeholder engagement and grievances mechanism

We will:

- Engage key stakeholders—including local communities and authorities—proactively and transparently to reduce potential risks and ensure social acceptability.
- Respect local cultures, rights, and traditions, in line with applicable laws and best practices.
- Maintain open, inclusive, and constructive dialogue with communities and key stakeholders.
- Operate and maintain a transparent, accessible grievance mechanism for all stakeholders, including for sensitive issues like gender-based violence.

5.0 Monitoring and reporting

AXIAN Telecom is committed to accountability and transparency. We will:

- Translate commitments into measurable objectives through structured risk-based programmes.
- Monitor, audit, and review HSES performance and management system regularly.
- Report annually via our sustainability report or other relevant reporting mechanisms, in line with stakeholder expectations and regulatory requirements.

6.0 Responsibilities

Senior leadership and management :

- Set the tone: actively participate in fostering health and safety culture and HSES risk prevention.
- Resource allocation: AXIAN Telecom will allocate adequate human and financial resources, at corporate and subsidiary levels, to ensure effective HSES implementation.
- Oversight: The ESG & Compliance Management Director within our Risk & Compliance Function is responsible for overseeing adherence and execution of this Policy and the HSES Management System.

⁴ <https://whc.unesco.org/fr/list/>

Staff:

- Access and familiarize with all HSES information and guidelines relevant to our roles and strictly follow them.
- Take all reasonable precautions to protect our own health and safety, safeguard our colleagues, preserve the environment, and protect the community.
- Report immediately to our direct manager, area supervisor, or the HSES team any incident, accident, unsafe act, or hazardous condition we witness or are involved in.

7.0 Review date

This Policy will be reviewed at least every 2 years according to the Master Policy or more frequently as required by regulatory changes, business context, or evolving best practices.