



**Vodafone UK Supplier Policy –
A3+ UK**

**Health, Safety, Environment &
Wellbeing**



Scope

The scope of this policy has been extended to include high risk environmental activities as defined below. For the avoidance of doubt, this Policy applies to all suppliers undertaking high-risk work for or on behalf of Vodafone Limited, which includes, all high-risk work subcontracted to a third party.

“Supplier” or “Supplier personnel” in this Supplier Policy shall, where relevant, also include all officers, employees, contractors, subcontractors and agents of Supplier and other persons under its influence or control. Supplier shall procure compliance with this Policy by such persons.

Policy

This Policy is in addition to (i) the Vodafone Global Supplier Health, Safety and Wellbeing Policy (A3) (“A3 HSW Global Policy”), and the requirements within (ii) Code of Ethical Purchasing (A2) and (iii) Business Principles (A1), with the purpose of defining specific Vodafone requirements for Health, Safety Environmental and Wellbeing. A3, A2 & A1 Policy are applicable to all suppliers working with Vodafone Limited and all requirements must be met. These documents can be found at-

<https://www.vodafone.com/about-vodafone/how-we-operate/suppliers/policies-and-requirements>

This document does not prescribe all of Vodafone Limited’s management arrangements. It forms part of a larger management system for controlling Health, Safety, Environment and Wellbeing (HSEW) risks and should only be used as the basis for local instructions and safe systems of work for applicable activities.

As part of Vodafone Limited HSEW management system, responsibilities (outlined in this document) are placed upon all high-risk suppliers working with or on behalf of Vodafone Limited

The criteria for categorising suppliers as high-risk are taken from the A3 Global Policy definitions. High-risk environmental activities are defined in this Policy.

Definitions and interpretation

References to HSEW shall include H&S and HSW in documents or policies referenced herein.

The following words and expressions have the following meanings in this document:

Absolute Rules	Means rules which we expect all suppliers to comply with when working for Vodafone Limited. The absolute rules are outlined in A3 Policy.
Supplier	Any person, contractor or organisation providing goods or services to or on behalf of Vodafone Limited.
Supplier Personnel	The supplier’s employees, supply chain contractors and other persons under its influence or control



High Risk Activities	Health and safety activities as defined in the A3 Policy and any high-risk environmental activities defined as where suppliers supply, deal, treat or transport any substance that could have a negative impact on the environment
Construction Activities	Activities including, but not limited to; excavation, lifting operations, cutting, grinding, welding, invasive work and hot works.
Consequence Management	A Vodafone process designed to hold suppliers to account for poor health and safety performance and extended in the UK to include environmental matters.
Incident	Any fatality or major incident, including environmental incident or other significant event (where loss or injury could have occurred) which will or could result in adverse consequences for Vodafone Limited.
HSEW	Health, Safety, Environment & Wellbeing
Applicable Laws	Means all UK HSEW laws, statutes, common law, regulations, ordinances, codes, rules, guidelines, orders, permits, tariffs and approvals, of any Governmental Authority that apply to the Parties.
Senior Management Tours	Vodafone senior leadership team site visits/tours to consider HSEW matters relevant to a project or activity.
Vodafone Limited	Vodafone Limited is the registered under company number 01471587 at Companies House with company registered address at Vodafone House, The Connection, Newbury RG14 2FN.
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrence Regulations 2013
ISO	
SSIP	International Organisation for Standardisation Safety Scheme in Procurement

General Requirements

1. General

Supplier shall:

- 1.1 Make adequate provision for HSEW for its employees, visitors, contractors and any sub-contractors working on its behalf.



- 1.2 Comply with applicable laws and approved codes of best practice relating to HSEW.
- 1.3 Comply with all additional and relevant Vodafone Limited standards and regulations relating to HSEW.
- 1.4 Obtain any necessary permissions, permits, licences or insurances required prior to commencing work and make these available to Vodafone Limited on request.
- 1.5 For all high-risk suppliers, be fully accredited under a Safety Scheme in Procurement (SSIP). The SSIP certificate **must** determine specific competencies for the scope of activities being provided. Vodafone's preferred SSIP provider is Alcumus SafeContractor however every high-risk supplier **must**, as a minimum, gain a 'deemed to satisfy' status with Alcumus SafeContractor and provide evidence of their full accreditation via their alternative SSIP.
- 1.6 All high-risk suppliers must continually maintain their SSIP accreditation while working for, or on behalf of, Vodafone Limited or work may be suspended.
- 1.7 Appoint a competent person responsible for all HSEW performance and reporting regularly to Vodafone Limited Project Management Team/Supply Chain Management as specified under each project.
- 1.8 Ensure roles and responsibilities with respect to the delivery of HSEW are clearly defined at all times.
- 1.9 Attend meetings and participate in audits and/or Senior Management Tours as reasonably requested by Vodafone Limited.
- 1.10 Ensure that appropriate systems and processes are in place (and adequately resourced) to identify and effectively control HSEW risks associated with the contract scope.
- 1.11 Ensure HSEW performance is always managed alongside operational performance.
- 1.12 Complete a minimum of 10% monitoring site audits on all high-risk activities and ensure results of these audits can be made available to Vodafone Limited on request.
- 1.13 Ensure systems are in place to report, record and investigate all HSEW Incidents in line with Vodafone Limited's incident reporting policy.
- 1.14 Ensure a HSEW plan is in place, shared and verified by Vodafone Limited's project management team before starting work.
- 1.15 For all high-risk suppliers – Operate a HSEW management system certified to ISO45001 and ISO14001 (or equivalent) by a recognised certification body. Where this is deemed unworkable, communicate, in writing to Vodafone Limited at the earliest opportunity to seek assistance and agree an alternative approach. Failure to meet and maintain this requirement, may result in suspension of contract.
- 1.16 Ensure that all personnel have completed Vodafone Limited specific training and that this is refreshed as required.
- 1.17 Ensure that all required medical/fitness to work, and substance use testing (where relevant) is completed as requested by Vodafone Limited.



- 1.18 Ensure that all premises and workplaces are maintained in a secure, clean, and tidy manner and that clear emergency arrangements are in place to protect those at work or those potentially impacted by the activity.

2. Sub-Contractors Controls

Supplier shall-

- 2.1 Wherever practicable, avoid the use of sub-contractors in preference for direct supply. All sub-contractors must be approved in writing by the Vodafone Limited project management team prior to work commencing. Only in exceptional circumstances will sub-contracting be permitted.
- 2.2 Have and maintain robust mechanisms for the selection, management and performance monitoring of all sub-contractors appointed. These should include as a minimum.
 - 2.2.1 Systems and processes for assessing the HSEW capability/competency of sub-contractors as part of the initial selection process;
 - 2.2.2 A process to effectively communicate Vodafone Limited's HSEW requirements and contractual arrangements to all sub-contractors; and
 - 2.2.3 A mechanism to monitor and periodically assess HSEW performance and take immediate and effective action to address under performance of sub-contractors.

3 Training and Competence

Supplier shall-

- 3.1 Have and maintain a robust HSEW training regime for all Supplier Personnel to ensure that all persons set to work on behalf of Vodafone Limited are trained to deliver their assigned tasks in a safe manner including:
 - 3.1.1 appropriate training for all tasks (in an appropriate language and delivered via appropriate means for the target audience);
 - 3.1.2 mechanisms to ensure that high-risk activities are only completed by trained, competent and qualified Supplier Personnel;
 - 3.1.3 maintenance of appropriate training records available for inspection by Vodafone Limited at any time; and
 - 3.1.4 ensure all relevant Supplier Personnel complete Vodafone Limited training as mandated by Vodafone Policies and refresh as required.

4. Contract Performance Reporting and KPIs

- 4.1 All high-risk Suppliers shall report to the Vodafone Limited project management team on the following metrics both in relation to their entire operations but specifically for Vodafone Limited related activities where the supplier is ultimately responsible for HSEW:
 - 4.1.1 number of fatalities as a direct result of a work-related injury/activity (to be reported at the earliest opportunity to hse.helpline@vodafone.com or 03333 04 6666)
 - 4.1.2 number of high consequence/RIDDOR reportable work-related incidents
 - 4.1.3 all HSEW incidents that occur while undertaking work on behalf of Vodafone Limited
 - 4.1.4 number of site inspections/audits undertaken and detail of outcomes



- 4.1.5 number of statutory interventions
- 4.1.6 environmental data- waste, emissions and any other metrics requested
- 4.1.7 any proposed changes to sub-contractor resource required, prior to appointment
- 4.1.8 any significant changes or challenges with the scope of works
- 4.1.9 training compliance (for Vodafone Limited specific training)
- 4.1.10 any changes in accreditation (Industry specific, SSIP and ISO status) required to comply with Vodafone Policies or their legal obligations
- 4.1.11 any medical or fitness to work results, which may include drug and alcohol testing depending on contractual requirements
- 4.1.12 such other metrics as Vodafone Limited may reasonably request.

Additional UK Specific requirements for high-risk activities

5. HSEW Plan for high-risk activities

Supplier shall have and maintain a HSEW plan for all high-risk activities which have been adequately planned and approved by a competent HSEW professional before commencement of work; setting out measures to manage and suitably reduce the potential risk of injury/incident occurring for each project. Supplier shall manage the risks in accordance with the HSEW plan and shall provide a copy of the HSEW plan to Vodafone Limited project management team as soon as practicable.

5.1 The HSEW plan must include, but is not limited to:

- 5.1.1 a full scope of work;
- 5.1.2 key contacts for HSEW including qualifications, competencies, and responsibilities;
- 5.1.3 risk assessments, method statements and safe systems of work specifically tailored to the activities and location;
- 5.1.4 HSEW training matrix for relevant Supplier Personnel;
- 5.1.5 procedures for emergencies, monitoring, auditing, inspection, certification, incident reporting, investigation, selection and management of subcontractors, data collection and control of high-risk products, plant/ equipment, and substances;
- 5.1.6 measures to prevent accidents causing personal injury or death; and
- 5.1.7 relevant requirements of Applicable Laws and compliance plans.

6. Working at Height

Supplier shall follow guidance provided by the Mast and Tower Safety Group (MATS) <https://matsgroup.info> and ensure that compliance with the green book* is always adhered to. Supplier shall also ensure that climber safety medicals are completed and valid at all times.

7. Electrical Work

Supplier shall comply with Vodafone Limited's electrical competency arrangements* and complete any required training as deemed necessary

8. Radio Frequency (RF) Safety



Supplier shall adhere to the safe isolation procedure TORO 500* when working for or on behalf of Vodafone Limited

9. **Construction Activities**

Supplier shall-

9.1 for all network build/maintenance activity, apply the MATS definition of what is a construction activity in telecoms and ensure compliance with the Construction, Design and Management Regulations 2015 (CDM 2015).

9.2 be formally appointed, for each contract under CDM 2015, where applicable, by Vodafone Limited project management team and supply chain (the Client)

10. **Incident Reporting, Investigation & Consequence Management**

Supplier shall -

10.1 ensure all significant environmental incidents be reported by the same method and investigations completed within the same timescale as any health and safety incident.

10.2 be subject to Vodafone's Consequence Management process where there has been a major environmental incident resulting in significant loss or potential consequence for Vodafone Limited

Note: *Documents can be located at <https://www.vodafone.com/about-vodafone/how-we-operate/suppliers/policies-detailed-guidance>