

EH&S

# Environment, Health and Safety Policy

TDF's EH&S policy is underpinned by identifying and classifying risks arising from the company's operations on an ongoing basis, while focusing on key risks, defining safety measures for employees, customers and suppliers, ensuring the safety of infrastructures, improving labor conditions, protecting the environment, implementing training and awareness programs for accident and incident prevention, with an overall objective to eliminate all high-risk incidents.

Risk management requires a program of preventive measures, group and individual security facilities, site and policy audits.

Every year, the company prepares an ongoing improvement system working closely with the CHSCT (Health and Safety and Labor Conditions Committee, headed up by the Director of Industry) with an annual prevention plan that lays down specific actions and objectives.

# EH&S POLICY GUIDELINES

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TDF's EH&S policy guidelines are underpinned by four main principles, as detailed below.

## 1/ PERSONAL HEALTH AND SAFETY

The unique document for professional risk assessment is a legal reference document which lists risks, frequency and levels of severity associated with each job in the company. This document is updated annually together with the CHSCT. The policy for people's safety and related actions aims to:

### Prevent accidents and near-misses:

- Apply general prevention principles, especially evaluating unavoidable risks, taking general protection measures, prioritizing them over individual protection measures.
- Put together and run training programs, such as preventing falls from heights, electrical risks, load handling etc
- Identify and analyze operational risk on-site (work and maintenance) during joint inspection visits and define a program of company-wide preventive security measures. All TDF's suppliers and customers to adhere to the program's rules
- Distribute safety information to all TDF employees (site access maps, site information, pocket safety instructions in case of emergency and so on).

**Provide rapid relief:** provide first aid kits in vehicles, put up posters of evacuation plans, train volunteer first aid and rescue teams, demonstrate how to use cardiac defibrillators.

**Protect staff working at heights:** prioritize group safety measures rather than individual ones. All assistance to be carried out by two authorized members of staff.

**Prevent road accidents:** introduce corporate vehicle policies (appropriate vehicles and proper maintenance) and policies for drivers (covering road awareness training, instructions, etc).

**Protect staff from electromagnetic fields:** avoid exposure to levels higher than the recommended limits (measurements of the areas and tailor-made instructions, group and individual protection plans).

**Safeguard isolated work:** install manual alarm devices in vehicles (peripatetic workers), rank sites by type of operation defining the number of people needed (peripatetic workers) and introduce personal security alarms for isolated workers (DATI) on selected sites.

**Safeguard access:** checks on shared activity sites, risk assessment plan for dangerous work, mandatory request for access to the site before work begins.

## 2/ SAFETY OF INFRASTRUCTURE

Specifications relating to infrastructure (i.e. pylons, roof-terraces, electrical installations etc) defining the main design rules. Regular maintenance activity is undertaken annually to check infrastructure safety. Maintenance frequency depends on type of infrastructure. The aim of the policy is to:

### Encourage:

- Elimination of risk, including by dismantling, or replacing less dangerous equipment.
- Introduction of safety measures at the design stage of sites or services.
- Introduction of new, more reliable technology so as to minimize need for support.

**Adhere to** the number and frequency of audits necessary to comply with regulations regarding lifts, electrical facilities, safety equipment etc, and introduce changes for compliance as required.

**Manage asbestos risk:** eliminate friable asbestos and monitor the environmental risk of non-friable asbestos.

**Secure elevated signage on infrastructure:** monitor systems availability, work reliability, information process in case of failure.

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### Prevent fire risk:

- Carry out maintenance and renewal of fire detection systems and smoke alarms, as well as sprinklers on the network's main sites (fire protection on other sites).
- Monitor fire licenses.
- Organize regular fire drills.

### 3/ IMPROVE LABOR CONDITIONS

Labor conditions are reviewed regularly by the CHSCT and there is an on-going improvement program, which includes:

- Improve working tools and ICT resources (access to new technology).
- Analyze and verify working hours.
- Refurbish offices and workspaces, based on need.
- Streamline procedures.
- Share information and best practices for work procedures.
- Involve TDF employees and their representatives for selecting and implementing new work tools (vehicles).
- Work/life balance: teleworking, moderating use of telecommunications tools at home.
- Specialist training designed to boost acceptance of psychosocial risk prevention.
- Introduce a 24/7 psychological helpline.

### 4/ PROTECT THE ENVIRONMENT

TDF strives to go beyond its statutory obligations and cut its carbon footprint:

- **Air pollution:** HCFCs containing cooling units planned to be removed and replaced.
- **Soil and water pollution:** removal and elimination of electrical transformers at PCB (Polychlorinated biphenyls) treatment center; investigations at sites located in environmentally sensitive areas, provision of double lining for fuel tanks, followed by monitoring.
- **Dangers for local neighborhoods and nature:** environmental studies for new projects, installation dismantling plans, noise limitation measures for properties, research for landscape integration of TDF sites within classified sites, management of environmental complaints
- **Classified environmental conservation facilities:** update declarations for some operations, comply with relevant safety rules.
- **Waste management:** select approved suppliers, encourage recycling.
- **Elevated signage:** monitoring work order, work to improve reliability, safety information process in case of failure.

# ORGANIZATION

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Risk prevention relies on information, staff awareness and involvement of all company staff. The senior management team has a distinct responsibility for highlighting EH&S values in the company charter to its staff while ensuring that current safety rules and regulations are applied.

## THE DIRECTOR OF INDUSTRY:

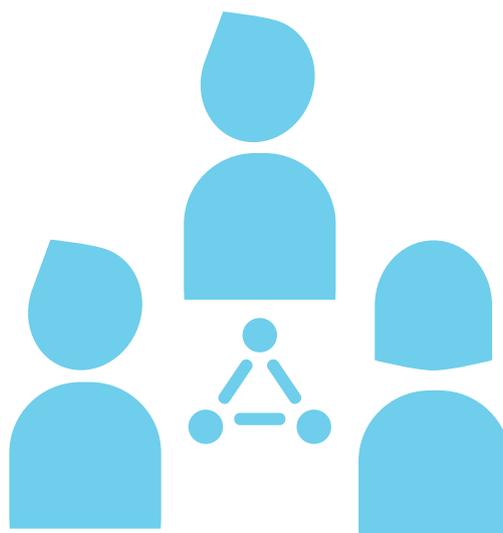
- Approves and guarantees implementation of the company's EH&S policies, and decides on actions and objectives for implementation.
- Chairs the CHSCT with the Joint Director of Industry, the Director of Cultural Heritage and the Operations Director and approves the annual prevention program.

**A NATIONAL AND REGIONAL EH&S TEAM is responsible for the cross-functional EH&S corporate policy and ensures the annual risk prevention plan is applied working closely with the CHSCT and other management teams.**

- **Nationally:** the EH&S department comes under the Cultural Heritage department and is responsible for establishing safety and environmental rules, defining and developing the EH&S policy, and related rules and regulations, and for implementing the annual risk prevention plan, while coordinating EH&S actions and dealing with feedback.
- **Regionally:** dedicated EH&S staff from the Cultural Heritage department (infrastructure and environmental safety) and Operations department (safety of TDF people and outsiders) are responsible for regional coordination of EH&S actions and feedback.

## EMPLOYEES AND THEIR REPRESENTATIVES ARE FULLY INVOLVED IN EH&S MATTERS

Employees have both EH&S and CHSCT representatives linked to work groups, site audits and accident investigations. Additionally, TDF holds regional committee meetings chaired by a staff representative and responsible for discussing regional EH&S issues with regional management, and then to prepare for national CHSCT meetings.



# EH&S MONITORING

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The Cultural Heritage department implements and controls an EH&S management system. It works generally in line with ISO 14001 and OSHAS 18001 principles and is based on continuous improvement.

## Its main principles include:

- Regulatory monitoring, conducted by the Cultural Heritage department and the Legal department.
- Strong emphasis on high risk identification and monitoring, using regulatory and standard-setting tools (through a “Unique Document for Evaluating Professional Risk” and proactively through management of “Significant Environmental Aspects”) and a table of all accidents, near-misses and incidents, updated every month and reviewed every quarter by regional committees and the CHSCT, who analyze the causes and investigation reports.
- Policy definition of identified risks, annual risk prevention plan sent to the CHSCT, monitoring and monthly analysis of indicators on a spreadsheet and use of EH&S audits.



# EH&S COMMUNICATION

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Risk prevention focuses primarily on keeping staff informed and trained about risk prevention, and incident and accident management. TDF's rules and procedures apply to staff, customers, contractors and sub-contractors.

## **Rules applicable on-site are distributed by:**

- "Pocket safety pack" containing safety tips.
- Prevention plans drawn up for building work and site maintenance.
- Specific safety instructions tailored for technicians' smartphones.
- Replies to requests for access for customers and sub-contractors.
- The intranet and extranet.

## **Maintenance and training programs are established:**

- Based on training plans updated annually depending on employee need and formalized in performance interviews between employees and their immediate manager.
- Traceability of training courses is provided by the information system updated by the EH&S team.

## **In case of an incident or accident**

Detailed investigations are carried out by local EH&S staff. All relevant details are recorded on a national spreadsheet, reviewed quarterly by regional committees and the national CHSCT.

In the event of large-scale or major events, the regional operations delegate takes all necessary measures. He has to inform the Department of Industry, the EH&S team and the CHSCT. It is up to local management to implement appropriate measures.





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