



TDF Group

Environment, Social & Governance Policy



As leading digital infrastructure operator, TDF Group helps bring about underlying progress in the economy and society. Indeed, developing telecoms and transmission infrastructure is now a must for giving French regions the wherewithal to stand on their own two feet and become fully-fledged players in the French economy.

For many years, we have placed corporate social responsibility at the top of our concerns, including a particular attention to the management of Health and Safety in all our businesses.

In 2011, we introduced our original Code of Ethics.

In 2014, TDF signed up to the United Nations Global Compact.

In 2015, two years before the French Sapin 2 Act, we introduced an anti-corruption policy.

In 2017, we launched a staff hotline to report ethics abuses.

This policy has the following objectives:

Satisfy our customers

- Most of our customers have implemented their ESG plans that are in line with our own.
- We help our internet service providers and mobile network operators customers go digital, especially in rural areas, including offering fixed and mobile superfast broadband. We participate in national and local authorities' efforts to bridge the digital divide.

Preserve the environment

- Reduce the carbon footprint of our operations and mitigate climate change risks

Promote staff and social activities

- We listen to our employees' expectations and improve staff dialog.
- We also contribute to local economies by training local staff.

Ensure compliance and ongoing dialog

- With our suppliers to improve their ESG performance
- With regulatory authorities, landlords and general public

Boost our appeal to investors

- We highlight our ESG achievements and progress to international investors when reporting about ESG performance assessments.

Our corporate culture at TDF Group is one of innovation and continuous improvement. Publishing our ESG policy comes on top of our social responsibility pledges.

TDF GROUP GOVERNANCE

The board of directors of Tivana France Holdings sets corporate strategy and oversees implementation thereof at all Group controlled subsidiaries, notably TDF, TDF Fibre, Ad Valem Technologies and ITAS. Said board of directors has four specialist committees that are tasked with preparing documents for board resolutions and monitoring implementation, as follows: operational committee, audit committee, investment committee and

remuneration committee. These committees comprise board directors and report to the board.

Tivana France Holdings is led by a chairman & CEO assisted by a Deputy CEO & COO appointed on the Chairman's recommendation. At present, the Tivana France Holdings Chairman and Deputy CEO are also Chairman and Deputy CEO of TDF.

Group ESG Committee

The EH&S-CSR department drives, oversees and runs ESG activities for all Group Business Units, divisions and subsidiaries. The department coordinates and ensures ESG policy implementation Group-wide, while the BUs, divisions and subsidiaries (operations) are responsible for monitoring their activities and producing ESG performance indicators. Operations help build TDF Group ESG culture on an ongoing basis and pass on ideas and feedback from staff to the EH&S-ESG department, which on request, may give advice or assistance to operations.

All Group Executive Committee members have their own specific ESG objectives. A monthly ESG steering committee, comprising corporate senior executives, BUs and management, is held.

During committee meetings, participants:

- Share ESG news and stories and talk about how Group ESG rules come across in their markets,
- Review ESG performance indicators and operational action plans,
- Approve recommendations and determine areas for improvement that will be put to the executive committee for approval,
- Share and approve ESG topics for public release and recommend ESG management changes.

Group Executive Committee

The CEO and Deputy CEO are backed by an Executive Committee, which takes all decisions required for the Group's proper management . Under the Group CEO's authority, the Executive Committee currently has ten members: CEO, Deputy CEO-COO, two Joint Managing Directors of the TowerCo BU, Managing Director of the Audiovisual BU, Managing Director of the Fibre BU, Managing Director of the Operations Division, Managing Director of Finance, Strategy and Purchasing, General Secretary and Human Resources Director.



Code of Ethics

We have produced a Code of Ethics that describes the principles underlying our operations pursuant to ethics and applicable legislation. The Group Code is shared with all subsidiaries.

The Code consists of a series of behavioural rules that govern how Group companies and all Group staff should deal with various Group and outside parties. This document stands for our collective commitment to comply with applicable legislation, adopt open and honest business practices, combat fraud, report financial results transparently and more. It is designed to help everyone decide how to act in any real-life situation by referring to a few clearly stated principles.

The Code above all appeals to everyone's sense of responsibility.

The Group requests from all its subsidiaries to write and apply bespoke ethical rules that match their own operations, jobs and legal / regulatory rules.

[View the Group Code of Ethics](#)



United Nations Global Compact

In 2014, TDF signed up to the UN Global Compact committing to directly or indirectly support its 10 principles covering Human Rights, international labour standards, environmental compliance and combating corruption.

Every year, TDF publishes an Communication on Progress.

TDF has launched a relevant Sustainable Development Goals (SDGs) program in its operations, and which would mainly contribute to the 5 following SDGs (among the 17 SDGs) and could also apply later to additional SDGs if appropriate.



The review of ESG performance indicators demonstrate, among other matters, the Company's SDG progress.

ESG performance

TDF Group scored 100/100 for its 2020 ESG performance. As such, TDF came top overall and was awarded Sector Leader in the Data Infrastructure and Data Infrastructure – Data Transmission categories.

Every year, the Company hires independent firms to audit its ESG management system and performance. Audit findings give Company management insight into progress achieved and areas for improvement while enabling us to benchmark against our peers.



OUR COMMITMENTS

Our pledges are broken down between ESG criteria pursuant to international standards. The pledges listed below are detailed and explained in the following pages.

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CONSUMPTION



ENHANCE OUR
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SUPPORT DEVELOPMENT
DIGITAL
IN THE REGIONS



PROGRESS VIA STAFF
DIALOG



PROMOTE **EH&S**
POLICY



STRICTLY ENFORCE
A WORK QUALITY
OF LIFE POLICY



STRENGTHEN OUR **DIVERSITY** AND
CHARITABLE ACTIVITIES

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INNOVATE



PREVENT AND DETECT
CORRUPTION



LISTEN MORE TO OUR
STAKEHOLDERS



FURTHER **RESPONSIBLE**
PROCUREMENT

ENVIRONMENT



Tailored to each business location, periodical audits measure actual results vs. progress objectives forming part of an annual prevention program.

We go beyond regulatory requirements and seek to mitigate the environmental footprint of our operations. Air, ground, water and noise pollution, electromagnetic environments, environmentally classified facilities, waste treatment and air hazard beacons are all issues that we treat extremely seriously. We manage environmental risks largely based

on ISO 14001 procedures underpinned by continuous improvement. We are aware we consume considerable energy and we strive to minimize electricity and fossil fuel consumption and our greenhouse gas emissions.

MINIMIZE OUR ENERGY CONSUMPTION

The Group is working on 4 main streams :

1. Monitor energy consumption
2. Optimize energy consumptions
 - Modify car policy and increase the number of hybrid or electrical vehicles
 - Optimize the consumptions of its buildings
 - Implement heat pumps, free cooling in its datacenters, install LED lights, etc.
3. Develop renewable energy
 - Implement solar panels (solar panels, solar farms), when relevant, to produce renewable energy
 - Work on Power Purchase Agreements (PPA).
4. Promote employees' commitment
 - Communicate accurately to improve behaviors (switch off lights, limit speed when driving, reduce heating...)

20 production sites are equipped with solar panels.



Solar panels

We have launched a plan to set up solar panels at 100 of our towers site. Goal: cut our energy consumption and carbon emissions. 20 TDF sites already have solar panels.

ENHANCE OUR **WASTE MANAGEMENT**

We pledge to control waste production and to maximize waste recycling. The Company's offices and operational sites produce nineteen sorts of waste. Our waste generally comprises non-toxic production scrap, scrap metal, electric cabling and appliance scrap, paper and cardboard and occasionally maintenance chemicals. Responsible waste management is a regulatory, environmental and business requirement that we inform our stakeholders about. We select approved suppliers with a view to maximizing the proportion of recyclable waste.

23% of waste was recycled in 2020

TURN **BIODIVERSITY** INTO A WAY TO ADD VALUE

Our facilities are sometimes located in places requiring us to take particular care during their construction and throughout their useful lives. Factoring biodiversity into our operational decisions, primarily by teaming up with business partners, means we can help preserve wildlife, overcome practical local problems and build awareness of the surrounding natural areas among local staff.

5 sites are maintained by grazing livestock



Certified datacenters

Our four datacenters are all European Code of Conduct Participant* European Commission certified, a standard which promotes best practices in respect of energy efficiency and CO2 emissions. The Bordeaux-Bouliac datacenter is also RT 2012 certified**.

* Certification that lets participants share energy tips and best practices ** Thermal standard with energy consumption criteria



SOCIAL

Backed by our longstanding regional roots, we deploy end-to-end infrastructure solutions while meeting the needs of public and private sector clients including TV and FM radio channels, mobile phone operators, ISPs, corporations and institutions.

Reputed for our expert people, we support clients and municipalities with determination to ensure best-in-class operations and tight service quality control so that everyone benefits. Regarding human resources...

Regarding human resources, we strive to motivate our people and harness everyone's energy working together to connect everywhere, faster. To do so, the HR department breaks down its activities into three core goals - anticipate,

promote and balance. Anticipate staying nimble and attract top class people; promote to build staff skills; balance to enshrine a robust and fair HR framework that balances business needs with staff wellbeing.



SUPPORT DEVELOPMENT DIGITAL IN THE REGIONS

Broadcasting and telecoms infrastructure is a must so that local municipalities can support people's lifestyle changes caused by digital while boosting jobs and enhancing the appeal of regions. As key network developer and operator, we invest in infrastructure that meets broadcasting and connectivity needs of everyone including private people, business and government agencies. Our goal : be a partner of choice for the regions.

19500+ mobile phone points-of-presence deployed on TDF facilities as of December 2020.



PROGRESS VIA STAFF DIALOG

Staff dialog underpins our corporate culture and means we listen and meet staff expectations in line with our corporate strategy. Human Resources support the Company as it evolves. Despite the pandemic, we maintained staff dialog, including by meetings with our works council and unions.

3 staff agreements were signed by TDF management and staff representatives in 2020 including two relating to life-incapacity-invalidity insurance and medical cost insurance.



Fibre in rural areas

We help bridge the digital divide by rolling our fibre optics in rural areas of five French counties: Val d'Oise, Yvelines, Loir-et-Cher, Indre-et-Loire and Maine-et-Loire.



PROMOTE EH&S POLICY

Based on our EH&S policy, we pledge to forecast, pinpoint and measure our operational risks and to introduce preventive rules for our staff, customers and subcontractors. We launch programs to guarantee enhanced labour conditions and safety of our infrastructure and mitigate our environmental footprint. These programs form part of our continuous improvement campaign designed to achieve our “Zero serious accident” goal.

Zéro serious accident is our goal and to get there we have introduced an ambitious EH&S program that includes preventive measures, training, site audits and more.



Safety in your pocket

To build awareness of on-site safety among our and outside staff, we distribute our Safety Pocket Manual, which covers all guidelines for operational jobs.



STRICTLY ENFORCE A WORK QUALITY OF LIFE POLICY

We believe quality of life at work is a key factor to enhance well-being for both individual employees and collectively. So, we plan to launch a program driven by all our people and backed by corporate management.

3 staff agreements attest to our commitment: Quality of life at work, home-working and gender equality



STRENGTHEN OUR DIVERSITY AND CHARITABLE ACTIVITIES

We strive to be a good corporate citizen and we actively foster diversity among our workforces. So, in 2021 we signed our first job hiring and job retention agreement for the disabled. Meanwhile, we continue our charitable activities by the Company and our staff supporting charities.

We have **4** mentors and **8** facilitators working for the charity Article 1.



Gender equality

Pursuant to a 2019 staff agreement, we commit to gender equality, including maternity and paternity leave. We have planned countless measures to narrow the gender gap, which includes teaming up with charity "Elles Bougent". HR department staff were instrumental in securing TDF's top-class 2020 gender equality index score of 92/100.



Working from home

We first allowed employees to work from home in 2012 with a view to enabling them to achieve a better work/life balance. Under the latest (2015) staff agreement they may work 2 days a week from home. To learn lessons from the pandemic, a new staff agreement was signed in 2021.

In 2020 TDF had 358 home-working staff with amendments to their employment contracts. During the pandemic, just under 1 000 staff worked from home.



Parents at work

The Company has found novel ways to help staff when they become parents: free entry to a chain of nurseries for working people, maternity and paternity leave lengthened, parental leave introduced. In 2020, TDF signed up to the Parental Act, whereby the non-working parent is entitled to one-month fully-paid paternity or adoption leave.

GOVERNANCE

We operate throughout mainland France and French overseas territories from our offices and production locations. Our organizational set-up is both complex and enriching and means very varied relations with our stakeholders, especially external stakeholders. We must be

beyond reproach and strict in how we behave and dealings with our business partners. We are well aware of how we can contribute to local communities where we operate and we are quick to bring to bear our staff, expertise and skills and team up with new business partners.



INNOVATE

Innovation underpins our strategy as we strive to pinpoint and develop tomorrow's technologies. By fostering Group-wide discussion and teamwork between different Company businesses, innovation is a powerful driver of staff motivation and commitment. And given that innovation goes far beyond technology, it also involves the Company questioning and changing its operational procedures and practices to boost social mobility and environmental preservation.

2 Company events arranged in 2020 to foster an innovation-based culture



Our Campus, at the heart of innovation

Located in the Commune des Lilas within the Romainville Fort, the Campus trains the Company's operating staff. It serves as a showroom for our tech know-how and world-class operations



Small ideas that turn into BIG ones

With a view to paving the way for new business goods and services, we have introduced a committee based on a so-called 'BIG' program. This committee runs and guides ideas that staff submit and oversees Group-wide projects.



PREVENT AND DETECT CORRUPTION

We pay close attention to combating corruption, abide by OECD anti-corruption principles and ban any fraud or corruption. Driven by corporate senior management, we apply an anti-corruption policy throughout the Company that is overseen by the Audit and Internal Control department. Every year, we map corruption risks and put on corruption training courses for staff.

600+ participants underwent anti-corruption training as of end of 2021.



FURTHER RESPONSIBLE PROCUREMENT

By including ESG clauses in our purchasing general terms and conditions, we ensure that our service and goods suppliers abide by an ESG Policy equivalent to our own, including human rights compliance and anti-corruption. We reserve the right to carry out audits to verify policy compliance. What is more, we plan to add ESG criteria to our specifications to further sustainable development.

Purchasing general terms and conditions including ESG clauses are reviewed and updated every year.



LISTEN MORE TO OUR STAKEHOLDERS

We keep track of progress of relations with all Company and outside stakeholders from a host of sources including tender bids submitted, setting up new operational sites, new staff induction and labour conditions enhancements. Regarding each stakeholder, contact person and communication channel, we strive to build enduring trust-based relations that meet our stakeholders' expectations.

All environmental requirements factored into lead times in 2020.

OUR MISSION: CONNECT EVERYWHERE, FASTER

As transparent and impartial operator, over the last four decades or more we have helped digital firms in mainland France and French overseas territories meet their strategic transmission goals.

For radio and DTT broadcasting, mobile ultra high-speed broadband coverage and rolling out optical fiber, TDF, brings clients in-depth operational expertise, a mix of unique and ground-breaking technology and an exceptionally widespread local presence.

We develop on behalf of our clients a comprehensive array of services related to bringing digital to people in their daily lives. In an ever more connected world, TDF has enabled telecoms and media companies to connect the French regions and people, backed by its 19,000 sites, everywhere and faster.

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