



Health & Safety Policy

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VGP Health & Safety Policy

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VGP is committed to making our business and our properties safe and healthy places to work and visit

VGP recognizes the importance of the safety and wellbeing of our employees, tenants, contractors and suppliers, and of our positive impact on the communities in which we operate. VGP's health and safety approach is aimed at embedding health and safety within the culture and behaviour of all employees by being proactive in the elimination of risks through tighter controls, training and raising awareness, rather than reacting after the event.

VGP Health & Safety ("HSE") policy aims to protect the employees of VGP and of its contractors working on the VGP construction sites. Human life being the ultimate value, VGP strives to limit the number of accidents to the lowest possible number.

VGP's health and safety approach builds on the following foundations:

- (i) compliance with applicable legislation
- (ii) responsibility of VGP management
- (iii) additional rules and principles designed to increase the awareness and efficiency of HSE protection at VGP construction sites.

The VGP HSE Policy is applicable for all VGP subsidiaries, all team members of VGP, but shall be also binding for all contractors providing services and supplying goods to VGP construction sites through the adoption of the **Supplier Code of Conduct** into the supply agreements.

COMPLIANCE WITH APPLICABLE LAWS

VGP, all members of the VGP team and any suppliers of VGP are obliged to learn about and comply with all applicable laws in the area of HSE.

In particular, VGP strives to:

- ensure that significant risks arising from work activities under VGP's control are eliminated or adequately controlled
- maintain all workplaces, buildings, plant, equipment, machinery and hazardous substances under VGP's control in a condition that is safe and without risk to health
- ensure that all employees receive appropriate information, instruction and training, and are competent to carry out their designated responsibilities
- develop appropriate occupational health services for employees to access.

For every construction site, in particular:

- an HSE coordinator is appointed either by VGP directly or by the general contractor;
- an HSE plans shall be in principle developed, taking into account the specifics of the project;
- VGP project manager shall participate at regular reviews of HSE matters and shall ensure that the conclusions of such reviews are implemented.

VGP MANAGEMENT RESPONSIBILITY

VGP establishes management responsibilities for HSE matters and appropriate reporting. Each incident on a VGP construction site is reported via internal channels and reviewed. VGP strives to maintain injury free construction sites.

Every VGP team member, as well as any supplier, customer, or a bystander, is encouraged by VGP not to leave any health or safety issue on VGP construction sites or buildings unresolved. If you walk by, please report such to the **VGP Compliance Hotline***.

Country managers are responsible for monitoring the appropriate staffing of each construction site. Project managers are responsible for monitoring the compliance of the suppliers with the recommendations of the HSE coordinator and for reporting any non-compliance. The CTO ensures that appropriate policies and trainings are in place and that any incident is properly investigated. Reports of any incidents are reviewed by the top management, including CEO, COO and the General Counsel and appropriate conclusions are drawn.

Supplier selection processes shall incorporate assessment ensuring that the selected supplier meets VGP's minimum requirements on health and safety. In particular, the selection of subcontractors by VGP suppliers shall be monitored and prevent the appointment of subcontractors further removed from the VGP oversight.

* VGP Compliance Hotline: <https://vgp.speakup.report/en-GB/compliance/home>

ADDITIONAL VGP ACTION

VGP will introduce an annual training on health and safety procedures for the team members with direct responsibilities for construction sites.

VGP has introduced a **Compliance Hotline*** for reporting of HSE concerns by its employees, employees of its suppliers or members of the communities, where VGP develops its projects. VGP informs of the availability of such a reporting channel through posters on its construction sites.



CONCLUSION

VGP will communicate the Health & Safety Policy to all employees, and it will be freely available on its website. This policy and any supporting documentation will be reviewed annually and updated as required to conform to current legislation and company activities.

Jan Van Geet
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