



# 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.

### **For every supplier:**

- Suppliers are required to comply with all relevant safety (we generally expect our general contractors and health-and-safety coordination partners to comply with ISO45001), labour and environment (including but not restricted to waste and water management) legislation
- We expect our general contractors and engineering partners to have a site environmental management accreditation (ISO 14001), including operating with best practices
- Suppliers are required not to engage in any direct or indirect form of human trafficking, slavery, forced or involuntary labour

# 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.

Suppliers are required to accept the suppliers code of conduct including the group's health and safety requirements. 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>

# HEALTH & SAFETY POLICY STATEMENT

It is the policy of VGP to ensure, so far as is reasonably practicable, the health and safety of all employees and any other persons who may be directly affected by the activities of the Group.

VGP's operating policies and procedures are compliant with all relevant legislation and directives of the countries in which it operates.

## **VGP will:**

- Establish and maintain safe and healthy working environments that minimize the risks to health, safety and welfare
- Ensure that significant risks arising from work activities under VGP's control are eliminated or adequately controlled
- Develop and implement appropriate health and safety procedures, and safe working practices
- 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
- Achieve compliance with legal requirements

## **These objectives will be achieved through:**

- Cultivating a proactive attitude towards health and safety, with inclusion of health and safety KPIs as part of the ESG employee remuneration score card
- Providing adequate resources to implement this policy
- Ensuring this policy is understood, implemented and maintained throughout the organisation
- Driving continual improvement in health and safety performance by regularly measuring and reviewing compliance with the policy and the management systems that support it
- Assessing all suppliers to ensure they meet VGP's minimum requirements on health and safety with the requirements embedded in the Supplier's Code of Conduct

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



## ADDITIONAL VGP ACTION

Through the VGP Accademy has introduced an annual training on health and safety procedures for all employees and with dedicated training 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.

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

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