Objective/Risk:
Suppliers undertake a significant proportion of Vodafone's activities, including high risk activities. This policy is an addition to the Global Supplier Health, Safety and Wellbeing Policy (A3) and Supplier Policy – Code of Ethical Purchasing (A2) to define specific Vodafone UK Health, Safety, Environment and Energy requirements for suppliers undertaking works on behalf of Vodafone in the UK.

The purpose of this document is to define the additional Vodafone UK requirements.

Scope
This policy applies to all suppliers undertaking works for or on behalf of Vodafone UK. Additionally, this policy applies to all Vodafone UK employees (permanent or temporary), Vodafone Group employees who work in the UK, all contracted employees and those people employed by external parties working for or on Vodafone UK's behalf.

Compliance levels are monitored and reviewed by appropriate governance bodies. Any breach will be treated as a serious disciplinary offence and may be subject to disciplinary action.

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1. Policy principles

This policy is an addition to the Vodafone Global Supplier Health, Safety and Wellbeing Policy (A3) and Supplier Policy – Code of Ethical Purchasing (A2) with the purpose of defining specific Vodafone UK requirements. The Global Supplier Health, Safety and Wellbeing policy and Code of Ethical Purchasing Document are applicable to all suppliers working with Vodafone and all requirements must be met.

This document does not prescribe all of Vodafone UK’s management arrangements, it forms part of a larger management system for controlling Health, Safety, Environment and Energy (HSE) risks and should be used as the basis for local instructions and safe systems of work for specific activities.

1.1 Definitions

Refer to the Global Supplier Health, Safety and Wellbeing policy (A3) and Code of Ethical Purchasing (A2) for definitions.

HSE – Health, Safety, Environment(al) and Energy

HSEW – Health, Safety, Environment, Energy and Wellbeing

SCM – Supply Chain Management

Category Manager – role within SCM looking after a particular category of works e.g. marketing, network deployment

1.2 Information

For further help or guidance please contact HSE.Helpline@vodafone.com.

2. Policy controls and deliverables required for compliance

2.1 Additional Requirements on Suppliers – Subject to activity and organisational size

For all high-risk activities, the supplier must be accredited by SafeContractor for the relevant category(ies) of works being undertaken.

Suppliers’ SafeContractor status must be regularly monitored by the Vodafone SCM category manager. If a suppliers’ SafeContractor accreditation lapses this must be addressed through the supplier performance management mechanism and reaccreditation gained within three months.

For all activities with a significant impact on Vodafone’s UK energy performance, the supplier:

• can make comments or suggest improvement opportunities by emailing UKEnergyFightback@vodafone.com shall receive and/or recommend appropriate energy training as required by Vodafone.

2.2 Vodafone UK Health, Safety, Environment and Energy policies

In addition to the Vodafone Global Health, Safety, Wellbeing and Environment policies, Vodafone UK have a number of documented HSE policies including (but not limited to) Incident Reporting, Working at Height, Electrical Competency Arrangements, Waste Management and Pollution Control, and ISO 50001 Energy Policies.

The SCM category manager must provide suppliers with access to all applicable Vodafone UK HSE policies. Suppliers must confirm in writing to the SCM category manager that they have read and understood the relevant policies.
### 2.3 Supplier HSE Performance Management

All suppliers must have an appropriate level of HSE performance management in place which must include but not be limited to:

- ensuring suppliers undertaking high risk activities have a suitable health and safety plan in place.
- ensuring works are appropriately planned, including provision of suitable and sufficient HSE risk assessments for the activities being undertaken.
- site inspections to ensure the supplier is working in accordance with their health and safety plan, HSE risk assessments and the requirements of all Vodafone policies – the level of inspections should be established at the appointment stage and must be proportionate to the risk involved (e.g. high risk works require a high level of checks including on site samples, low risk activities may only require a desktop review).

**NOTE: an appropriate external audit service may be utilised to provide assurance**

- regular reporting to Vodafone and review of HSE performance including incident statistics, site inspections, emerging risks, HSE initiatives and any other relevant data.
- environmental reporting as required by Vodafone.
- ensuring suppliers have received appropriate energy training when undertaking activities that have a significant impact in Vodafone’s UK energy performance.
- ensuring suppliers are aware of the process in place to make comments or suggest improvements to Vodafone’s UK energy performance.

Where Vodafone identify concerns regarding supplier HSE performance this must be escalated to the relevant SCM category manager and the HSEW Team. An improvement plan must be put in place by the supplier and approved by the SCM category manager. Where improvement plans do not deliver the required performance improvement the Consequence Management process may be implemented in line with the Global Supplier Health, Safety and Wellbeing (A3) policy.

### 3. Roles and responsibilities

**SCM Category Manager must:**

- Ensure suppliers undertaking high risk activities provide an appropriate Health & Safety plan at qualification stage (in line with Global Supplier Health, Safety and Wellbeing policy).
- Ensure suppliers undertaking high risk activities provide evidence of relevant SafeContractor accreditation and regularly review compliance to ensure suppliers undertaking high risk activities are maintaining all necessary accreditation(s).
- Address any lapses in HSE accreditation through the supplier performance management mechanism.
- Address supplier HSE performance concerns with the relevant supplier and ensure appropriate improvement plans implemented.
- Inform suppliers that energy performance is one of the evaluation criteria for procurement when procuring energy using products, equipment and services that have a significant impact on Vodafone’s UK energy performance.
- Evaluate energy performance when procuring energy using products, equipment and services which are expected to have a significant impact on Vodafone’s UK energy performance.

**High risk suppliers must:**

- Obtain SafeContractor for the most relevant category(ies) of works being undertaken before the commencement of work.
- Confirm in writing to the SCM category manager that they have read and understood all relevant Vodafone HSE policies.
- Have a suitable HSE plan in place before the commencement of work.
- Ensure works are appropriately planned, including provision of suitable and sufficient HSE risk assessments.
• Provide to Vodafone regular reporting and review of HSE performance including incident statistics, site inspections, emerging risks, HSE initiatives and any other relevant data.

**Employee instructing a supplier to undertake works on behalf of Vodafone must:**

• ensure that works are appropriately planned to include provision of suitable and sufficient HSE risk assessments for the activities being undertaken.
• undertake documented checks to ensure the supplier is working in accordance with their HSE plan, risk assessments and requirements of relevant Vodafone policies.
• regularly review HSE performance of any suppliers they engage.
• escalate any concerns regarding supplier HSE performance to the relevant SCM category manager and the HSEW team.

**HSEW Team will:**

• Support the SCM category manager and relevant business areas in addressing concerns with the supplier HSE performance.
• Provide support and guidance to assist in the implementation of both this policy and requirements of the Global Supplier Health, Safety and Wellbeing policy (A3) and the Code of Ethical Purchasing (A2).
• Provide regular SafeContractor status reports to the SCM team to enable review of on-going accreditation.

4. **Exceptions**

Any exceptions to the requirements set out in this document must be approved by the HSEW Team.

5. **Supporting documents**

- Global Supplier Health, Safety and Wellbeing (A3) Policy
- Code of Ethical Purchasing (A2) Policy
- Vodafone UK Health, Safety, Environment and Energy policies (internal)
- Vodafone UK Health, Safety & Environmental Policies (External)
- SafeContractor - [www.safecontractor.com](http://www.safecontractor.com)

6. **Document history**

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Changes</th>
<th>Other standards affected</th>
<th>Approved by</th>
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<tbody>
<tr>
<td>1.0</td>
<td>01/03/21</td>
<td>New document</td>
<td>This completely replaces the previous Supplier Health and Safety policy which is no longer valid.</td>
<td>Eileen Roddis</td>
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<tr>
<td>2.0</td>
<td>08/06/21</td>
<td>Environmental Updates</td>
<td>Complements Vodafone’s ISO14001 and ISO50001 certified management systems</td>
<td>Eileen Roddis</td>
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<tr>
<td>2.1</td>
<td>29/09/22</td>
<td>Updated links to external site, Updated Policy Champion</td>
<td>None</td>
<td>Eileen Roddis</td>
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<tr>
<td>2.2</td>
<td>Sept 2023</td>
<td>Updated links and policy champion</td>
<td>None</td>
<td>Alex Clark</td>
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