

Vodafone Ireland

Health, Safety, Environmental and Wellbeing Statement

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
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Vodafone Health, Safety, Environmental and Wellbeing CEO Commitment



Our business success relies on this being a great place to work. I'm personally committed to ensuring everyone in Vodafone Ireland benefits from Health, Safety, Environmental and Wellbeing best practice.

I want to ensure we can all work in a stimulating environment, safe in the knowledge that Vodafone Ireland cares about our Health, Safety and Wellbeing and making sure that everyone engages their hearts and minds in ensuring that we always act responsibly and use Health, Safety and Environmental best practices in our workplaces.

We do this by:

Championing Environmental awareness, Health, Safety and Wellbeing whenever we see an opportunity
 Promoting a culture where an accident free environment and zero work related ill health is the norm and our impacts on the Environment is minimal.

Measuring Health, Safety and Environmental performance and continual improvement

Complying with our 7 Vodafone Absolute Rules, which asks us all to intervene when we see or think that something is wrong.

We are all responsible for working safely and in an environmentally friendly way, this allows us to return home from work without injury, ill health or damage to our environment.

Our Wellbeing programme enables you to check, manage and improve your own health. To understand more about our Wellbeing programme, click [HERE](#) and for Health, Safety and Wellbeing, our intranet site can be found [Here](#)

Our Vodafone Sustainability Report, which details our work on environmental and energy management, can be found [Here](#).

Always please remember, Work Safe - Home Safe.



Anne O' Leary
Chief Executive Officer
31st January 2019

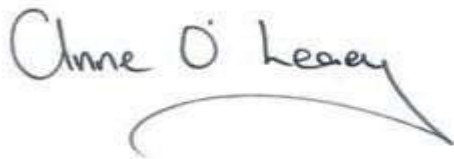
File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by:	James Magill
Version:	2019	Page number:	2 of 21
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Vodafone Health, Safety and Environmental Policy

Through our commitment to meet the requirements of all Health, Safety and Environmental legislation, Vodafone Ireland will continuously improve its service by implementing health, safety and environmental objectives and targets: It is the policy of Vodafone Ireland to:

- Provide and maintain
 - Safe places of work and working environments.
 - Safe Plant, equipment and substances.
 - Safe systems of work.
 - Processes and products
- Ensure that all risks to health, safety and the environment are assessed continually to include when new methods, processes, equipment or premises are being considered or planned to ensure that:
- Hazards- noise, manual handling, electricity, work at heights etc. are identified
- Suitable and sufficient control measures are put in place to minimise risks.
- Ensure legal compliance including on-going review to ensure we keep up to date with any and all legislative changes that may affect our activities.
- Ensure consultation with employees on H,S & E matters and encouraging their active involvement with, and commitment to, the company's effort to raise and maintain the standards of health, safety and environmental management in its business activities.
- Provide adequate health, safety and environmental information, instruction and training- in particular on induction courses –for managers, supervisors and employees to enable them to fulfil their responsibilities.
- Provide adequate controls and training of suppliers, contractors and visitors providing appropriate advice regarding health safety and environmental matters and any necessary precautions- such as method statements, permits to work, emergency procedures- to be followed when working on, or at a site.
- Ensure that all emergency matters- fire precautions, firefighting, emergency evacuation, first aid equipment and supplies are adequate to meet the needs of the staff and routinely checked and maintained.
- Ensure that all accidents or incidents are recorded, reported- where necessary to the Environmental Protection Agency, County Council, Health and Safety Authority- fully investigated and all steps necessary, so far as reasonably practicable, are taken to prevent a recurrence.
- Provide- where necessary- appropriate personal protective equipment (PPE) and clothing to protect health and safety of employees.
- Monitor the activities of contractors and other visitors to our sites.
- On-going monitoring of HS&E performance by site inspections, auditing, accident analysis, risk assessments.

The company management gives its full backing to this policy and will support all who implement it and will provide the necessary resources, training, structures, and procedures to implement this policy which will be reviewed at least annually.



Anne O' Leary
 Chief Executive Officer
 31st January 2019

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by.	James Magill
Version:	2019	Page number:	3 of 21
UNCONTROLLED IF PRINTED OR REPRODUCED IN ANY FORMAT Document Classification: C1		© 2019 Vodafone Ireland Limited. Confidential - For information purposes only. This document may not be distributed, copied, used or relied on in any way without the written consent of Vodafone Ireland. Vodafone Ireland reserves all rights and will not have any liability whatsoever in relation to this document.	

Table of Contents

Vodafone Health, Safety, Wellbeing and Environmental Policy 3

Vodafone Health and Safety Policies 5

Vodafone Health and Safety Risk Assessment Matrix 6

Organisational Flow Chart..... 7

Contents 8

Introduction 9

Scope 10

Health and Safety Management System 11

Leadership 11

Planning & Objectives 11

Implementation 17

Development..... 18

Performance measurement..... 18

Audit assessment and management review..... 18

Revision History..... 19

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by.	James Magill
Version:	2019	Page number:	4 of 21
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Appendix 1
 Vodafone Ireland Health and Safety Policies.

- 003 Health, Safety & Environmental Incident Reporting & Investigation
- 004 Underground Services – Cables in the Ground Activities.
- 005 Pregnant Employees
- 006 Risk Assessments
- 007 Electrical Safety
- 008 Product Safety and Assurance
- 009 – Access and Work Approval for High Risk Activities
- 011 Health and Safety in Supply Chain Management
- 012 Lifting Operations
- 016 Management of Radio Frequency Exposure at Work
- 018 Contractor Control.
- 024 Working At Height
- 025 Smoking At Work
- 026 Lone Working
- 028 Emergency Planning and Response
- 029 First Aid
- 031 Call Centre
- 032 Driving At Work
- 033 Ergonomics At Visual Display Unit Workstations
- 034 Management of Workplace Violence
- 035 Third Party Sites/ Customer Premises
- 036 Project Supervisor For The Design Process and Project Supervisor For The Construction Stage
- 037 Alcohol & Drugs (Intoxicants)
- 038 Personal Protective Equipment (PPE)
- 039 Warehousing

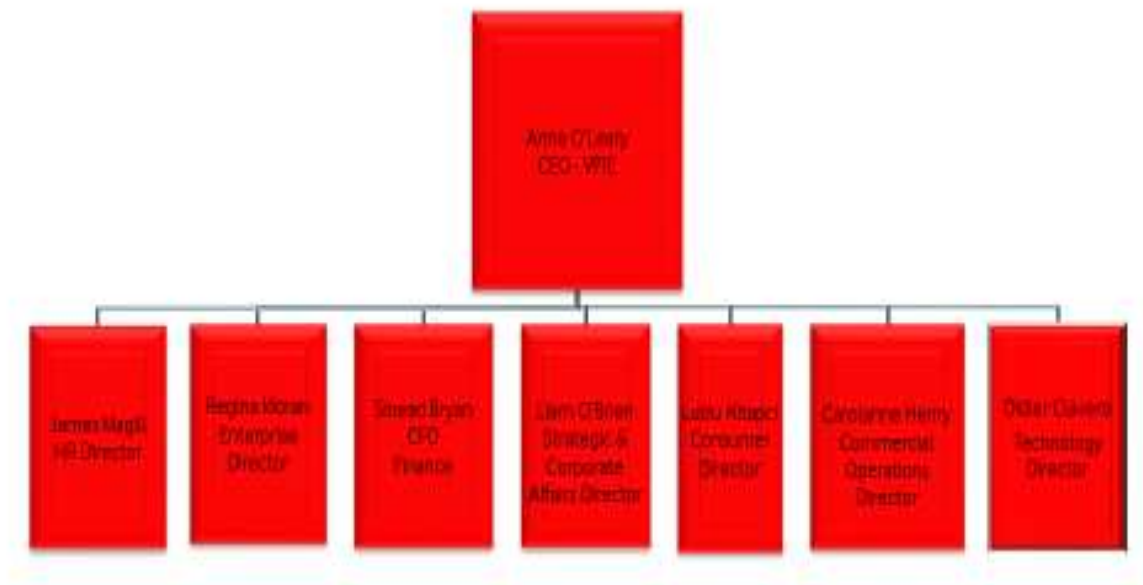
File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by.	James Magill
Version:	2019	Page number:	5 of 21
UNCONTROLLED IF PRINTED OR REPRODUCED IN ANY FORMAT Document Classification: C1		© 2019 Vodafone Ireland Limited. Confidential - For information purposes only. This document may not be distributed, copied, used or relied on in any way without the written consent of Vodafone Ireland. Vodafone Ireland reserves all rights and will not have any liability whatsoever in relation to this document.	

Appendix 2
 Vodafone Ireland Risk Assessment Matrix

- RA 001 – Antenna Support Structure
- RA 002 – Battery Equipment
- RA 003 – Bio-Hazard
- RA 004 – Call Centre
- RA 005 – Chemical Substances
- RA 006 – DC Power
- RA 007 – DE- Commission / Site Removal
- RA 008 –Electrical Safety
- RA 009 –Electronic Card Installation or Replacement
- RA 010 – Excavations
- RA 011 – Deliveries to Base Station/ Switch sites
- RA 012 –Heavy Prefabricated Materials
- RA 013- Ladders
- RA 014 –Manual Handling
- RA 015 –Mountainview
- RA 016 –Mobile Elevated Work Platform
- RA 017 – Optical Fibre Systems
- RA 018 – PPE
- RA 019 – Pole Work
- RA 020 –Portable Generator
- RA 021 –Power Supplies
- RA 022 – Radio Frequency / EMF
- RA 023 – Raising and Lowering Loads – Construction.
- RA 024 – Rectifier Cabinets
- RA 025 – Scaffolding
- RA 026 – Site Services (Existing Bases Station)
- RA 027 – Site Access / Egress- Base Stations
- RA 028 – Storage of Materials- Base Station Sites
- RA 029 –Time / Weather
- RA 030 –Tools
- RA 031 – Traffic Management and Street Works
- RA 032 – Truck Mounted Crane
- RA 033 – Vodafone Vehicles Drivers
- RA 034 – Working on Roof Tops
- RA 035 – Retail Store
- RA 036 – Warehousing

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by.	James Magill
Version:	2019	Page number:	6 of 21
UNCONTROLLED IF PRINTED OR REPRODUCED IN ANY FORMAT Document Classification: C1		© 2019 Vodafone Ireland Limited. Confidential - For information purposes only. This document may not be distributed, copied, used or relied on in any way without the written consent of Vodafone Ireland. Vodafone Ireland reserves all rights and will not have any liability whatsoever in relation to this document.	

Organisation Flow Chart



General

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by:	James Magill
Version:	2019	Page number:	7 of 21
UNCONTROLLED IF PRINTED OR REPRODUCED IN ANY FORMAT Document Classification: C1		© 2019 Vodafone Ireland Limited. Confidential - For information purposes only. This document may not be distributed, copied, used or relied on in any way without the written consent of Vodafone Ireland. Vodafone Ireland reserves all rights and will not have any liability whatsoever in relation to this document.	

Contents

Introduction

Scope

Health and Safety Management System

Overview

Leadership

Management commitment
 Health and Safety Policy.
 Health and Safety Objectives.
 Group and Legal Compliance.

Planning and objectives

Planning process
 Risk assessment
 Identification and analysis of requirements
 Management of change
 Resources
 Vodafone health & safety Standards
 Roles and responsibilities
 System documentation
 Training, awareness and competencies
 Communication and consultation
 Provision of information

Implementation

Hazard and risk management
 Emergency preparedness and response plans

Development

Accidents incidents reporting and investigation
 Contractors and supplier control
 Proactive and reactive monitoring

Performance measurement

Perception measures
 Performance indicators

Audit assessment and management review

Audit and Assessment
 Management Review
 Corrective and Preventive Actions
 Revision History.

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by.	James Magill
Version:	2019	Page number:	8 of 21
UNCONTROLLED IF PRINTED OR REPRODUCED IN ANY FORMAT Document Classification: C1		© 2019 Vodafone Ireland Limited. Confidential - For information purposes only. This document may not be distributed, copied, used or relied on in any way without the written consent of Vodafone Ireland. Vodafone Ireland reserves all rights and will not have any liability whatsoever in relation to this document.	

Introduction

Health, Safety Environmental and Wellbeing best practices are an integral part of our daily business process, not an add-on extra.

It's the Chief Executive Officer's responsibility to make sure we embed best practice into our workplace culture.

The role of the leadership team is to:

- Champion safety and wellbeing whenever we see an opportunity;
- Develop a culture where an accident free environment and zero work related ill health is the norm;
- Measure performance and continually improve.

Everybody is responsible for recognising the risks we face in our business and deciding what to do to reduce them to an acceptably low level.

Serious and Imminent Danger

If any person at work finds themselves in a situation where they may face serious and imminent danger to their health, safety or wellbeing, they are authorised to leave the area of danger, informing nearby people, and escalating to their line manager immediately. No person acting under this instruction may be placed at any disadvantage or penalised in any way as long as they have acted in good faith and within the bounds of their knowledge. Always keep a record if you have cause to act under this instruction.

Absolute Rules

"Breaking our Absolute Rules is unacceptable. We must always intervene when we see unsafe acts".

The following Absolute Rules have been developed to focus attention on common causes of fatalities and serious injury. We know from experience, that failing to follow basic health and safety standards leads to serious injury and fatalities for our people, the people we work with, and the people exposed to our activities.

Our Absolute Rules are mandatory and we encourage reporting of non-compliance. All reports will be investigated and may result in discipline.

This standard is applicable to all operations under Vodafone's operational and/or governance control.

Failure to comply with **Absolute Rules** will result in an investigation which may lead to disciplinary action. This could include termination of employment for Vodafone employees.

Employees of contractors or subcontractors may be removed from site and disqualified from future Vodafone work.

Line managers will be held responsible for communicating rules and ensuring compliance.

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by:	James Magill
Version:	2019	Page number:	9 of 21
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Scope

Scope

This document has a dual function as a “Safety Statement” and “Health and Safety Management Systems Framework Document”.

This Health and Safety Management Framework is required by Vodafone Group and provides a framework so that legal, risk and other requirements are addressed in a continually improving manner.

A safety statement is required by the Safety, Health and Welfare at Work Act 2005 and applies to all work places and work activities undertaken by or on behalf of Vodafone Ireland.

Vodafone Ireland operates from a variety of office locations, base stations, exchanges, data centres, and retail outlets and many work operations are hosted in third party premises. Where work activity takes place in shared workplaces, this policy will apply and we will liaise with the host employers to make the highest standard the norm.

Work activities should take account of all safety requirements from employer and from host companies. The guidance and rules are also generally applicable to home and mobile working.

Other site specific health safety and wellbeing statements may be required at certain locations. They must refer to this document as the parent and mirror its intentions.

This policy document applies to all Vodafone Ireland and subsidiary companies.

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by:	James Magill
Version:	2019	Page number:	10 of 21
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Health and Safety Management System

Overview

This Health and Safety Management System (HSMS) contains clauses or provides direction to documents to satisfy the requirements of a safety statement and HSMS.

This safety statement and related documentation demonstrates Vodafone Ireland's commitment to the Vodafone Group aims and we will abide by the specific policies as set by the Vodafone Group and by Vodafone Group Health and Safety Department.

Leadership

Management Commitment

See Vodafone Ireland Health Safety and Wellbeing Policy Statement as signed by Chief Executive Officer and reviewed every 12 months' by Vodafone Ireland.

Clearly Stated Health, Safety & Wellbeing Policy

This is satisfied by the safety policy statement contained in this document and signed by the Vodafone Ireland Chief Executive Officer. It is appropriate to the size and activities of Vodafone Ireland.

This policy will be included in the annual health and safety communications plan so that it is communicated to all stakeholders as appropriate.

Establishment of Health & Safety Objectives

The broad health & safety objectives are laid out in the safety policy statement and are taken into account in the detailed planning process as defined below.

Planning and Objectives

Planning Process

The detailed health and safety objectives for Vodafone Ireland are developed as part of the business planning process.

Group, legal, risk and other needs are taken into account and prioritised in to an action plan which aligns with the broad objectives of the safety policy statement.

Department action plans are developed by each department and monitored to ensure progress.

Progress against the objectives is reviewed frequently and actions requiring decision or input from senior management are escalated upwards.

A progress report on objectives is developed by the Health & Safety Specialist at the 6 month point and a full report is made as part of the health safety & wellbeing annual report.

Risk Assessment

Risk assessment is a mechanism which enables safe working by identifying ways to minimise risks.

There are legal and group requirements to manage risks.

The Vodafone Ireland risk assessment process is a high level analysis of the hazards and risks routinely presented during our work activities.

The full risk assessment document is accessible via the Vodafone intranet mechanism or on request from the Vodafone Ireland Health and Safety Specialist.

This document is supplemented by local risk assessments held by managers or in project documentation such as construction safety plans or files and on the Intranet.

Those risks with the highest impact are included for action in the Vodafone Ireland and departmental health & safety plans.

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by.	James Magill
Version:	2019	Page number:	11 of 21
UNCONTROLLED IF PRINTED OR REPRODUCED IN ANY FORMAT Document Classification: C1		© 2019 Vodafone Ireland Limited. Confidential - For information purposes only. This document may not be distributed, copied, used or relied on in any way without the written consent of Vodafone Ireland. Vodafone Ireland reserves all rights and will not have any liability whatsoever in relation to this document.	

Identification and Analysis of Requirements.

A legal register (Held on server) has been created to log and track health & safety legal requirements in Vodafone Ireland.

Management of Change

Significant changes are monitored through surveillance using contacts such as

- Professional body Institute of Occupational Safety and Health (I .O.S.H),
- Health and safety magazine
- Continuing professional development activities.
- Email updates from health and safety organisations.
- Vodafone Group Health and Safety Department

Resources

Vodafone Ireland will allocate resources as necessary to ensure the effective implementation of the health and safety management system.

This is primarily driven by the planning and checking and corrective actions processes.

Vodafone Health & Safety Standards

Health and safety standards referenced in this document below are subject to continual improvement and audit measures to assure effective implementation.

Roles and Responsibilities.

Employer.

Safety, Health & Welfare at Work Act, 2005, Section 8: — (Employers Duties)

- Every employer shall ensure, so far as is reasonably practicable, the safety, health and welfare at work of his or her employees.
- Without prejudice to the generality of Safety, Health & Welfare at Work Act, 2005 subsection (1), the employer’s duty extends, in particular, to the following:
 - Managing and conducting work activities in such a way as to ensure, so far as is reasonably practicable, the safety, health and welfare at work of his or her employees.
 - Managing and conducting work activities in such a way as to prevent, so far as is reasonably practicable, any improper conduct or behaviour likely to put the safety, health or welfare at work of his or her employees at risk.
- As regards the place of work concerned, ensuring, so far as is reasonably practicable—
 - the design, provision and maintenance of it in a condition that is safe and without risk to health,
 - the design, provision and maintenance of safe means of access to and egress from it,
 - the design, provision and maintenance of plant and machinery or any other articles that are safe and without risk to health.
 - ensuring, so far as it is reasonably practicable, the safety and the prevention of risk to health at work of his or her employees relating to the use of any article or substance or the exposure to noise, vibration or ionising or other radiations or any other physical agent.
 - providing systems of work that are planned, organised, performed, maintained and revised as appropriate so as to be, so far as is reasonably practicable, safe and without risk to health.
 - providing and maintaining facilities and arrangements for the welfare of his or her employees at work.
 - providing the information, instruction, training and supervision necessary to ensure, so far as is reasonably practicable, the safety, health, and welfare at work of his or her employees.
 - determining and implementing the safety, health and welfare measures necessary for the protection of the safety, health and welfare of his or her employees when identifying hazards and carrying out a risk assessment under section 19 or when preparing a safety statement under section 20 and ensuring that the measures take account of changing circumstances and the general principles of prevention specified in Schedule 3.
 - having regard to the general principles of prevention in Schedule 3, where risks cannot be eliminated or adequately controlled or in such circumstances as may be prescribed, providing and maintaining

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by.	James Magill
Version:	2019	Page number:	12 of 21
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such suitable protective clothing and equipment as is necessary to ensure, so far as is reasonably practicable, the safety, health and welfare at work of his or her employees.

- preparing and revising, as appropriate, adequate plans and procedures to be followed and measures to be taken in the case of an emergency or serious and imminent danger.

Employees.

Employee's duties are detailed in the Safety, Health and Welfare at Work Act, 2005.

In general, employees must,

- Comply with relevant safety and health laws.
- Take reasonable care of their own and their fellow workers safety and health which may be affected by their acts or omissions.
- Not be under the influence of an intoxicant at the place of work to the extent that they may endanger their own or others safety.
- If reasonably required by their employer, submit to appropriate, reasonable and proportionate tests by or under the supervision of a registered medical practitioner (for certain activities only and subject to the 2005 act and specific regulations).
- Co-operate with their employer and others to ensure safety and health at work.
- Not engage in improper conduct or behaviour.
- Use personal protective clothing and equipment in the appropriate manner.
- Cooperate with their employer and not do anything which would place themselves or others at risk through their actions or their omissions.
- Attend training and undergo assessment as may be required and make correct use of any article or substances provided for use.
- Report all defects immediately to their immediate supervisor, including defects in systems or work, plant, equipment, premises, which pose a danger.
- Inform their employers if they become aware that they are suffering from any disease or impairment, which would affect their or others safety in the work they perform.
- Not misrepresent himself /herself to an employer with regard their level of training already received.
- Observe all procedures, which are in place to ensure safety, health and welfare;
- Obey safety signs and instructions.
- On the first day of employment in a new area, understand the local Emergency Actions and walk through evacuation routes etc;
- Report all accidents, dangerous occurrences and near miss without undue delay.

Chief Executive Officer

The Chief Executive Officer is responsible for the establishment and maintenance of an ongoing and effective policy for safety, health and welfare by,

- Demonstrating personal commitment to the policy.
- Ensuring all directors and managers implement the policy in areas under their control.
- Periodically appraising the effectiveness of the policy.
- Ensuring their own responsibilities, and those of other persons concerned with the effectiveness of the policy, are reviewed on an at least yearly basis or as circumstances dictate.
- Ensuring all managers and employees are held accountable for their performance in relation to safety, health and welfare and that this performance is evaluated on an ongoing basis.
- Providing the necessary resources for the effective implementation of the policy and ensuring such resources are reviewed on a frequent basis;

Directors / Head of Functions

Directors and Heads of Functions are directly accountable to the Chief Executive Officer for the ongoing implementation of this Safety Statement by ensuring that:

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by.	James Magill
Version:	2019	Page number:	13 of 21
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- Managers and supervisors methodically check and review the hazards and risks in the workplace (including third party workplaces) by using risk assessment and safe systems of work to minimise those risks;
- Ensuring supervision and monitoring to minimise risks
- Information on health, safety and welfare is cascaded, as necessary, and an effective system of two-way communication is in place and monitored;
- All employees receive training as required by legislation or as a control measure as a result of risk assessment.
- Resources for safety, health and welfare are provided as necessary;

Director Responsible for Health and Safety

The group governance Framework requires that the Operating Company Human Resources Director or another designated board director will advise the Operating Company Chief Executive Officer in the operation of the Health and Safety Policy within the Operating Company.

In Vodafone Ireland the director responsible for Health Safety and Wellbeing is the Director of Human Resources.

Human Resources Director.

In addition to the duties as director responsible for Health, Safety and Wellbeing, the Human Resources Director is responsible for the following matters pertaining to the safety, health and welfare of company employees,

- The HR Director is responsible for implementation and ensuring that adequate resources are available to ensure effective delivery of the requirements of this policy.
- Co-ordination of procedures for the referral of illness cases to the company doctor.
- Ensuring that individual employee absence and ill health records are maintained.
- Arranging for pre-appointment medical screening process.
- Assisting and advising in employee health and safety consultation mechanisms to ensure consistency and balance.

Health & Safety Specialist

The Health & Safety Specialist will oversee the development, implementation and maintenance of the company safety policy and strategies.

The Health & Safety Specialist will be responsible for:

- Driving the reviews of the Vodafone Ireland Health Safety and Wellbeing Statement.
- Ensuring that risk assessments and controls are carried out by managers and supervisors responsible for the work area.
- Investigation, analysis, reporting, recording and follow-up with line management & insurance parties of accidents occupational illness, injury absence and dangerous occurrences.
- Notification to the Health and Safety Authority of reportable accidents or dangerous occurrences.
- Liaison with all managers on the implementation of this Safety Statement.
- The design, development and auditing of checking and corrective action mechanisms including auditing and inspection procedures.
- Ensuring effective employee consultation.
- Ensuring that risk assessments are carried out for the protection of pregnant employees.
- Provide advice to ensure Personal Protective Equipment (PPE) is correctly specified and adequate for its intended purpose.
- The ongoing provision of updated information, identification of training needs, and the development of training programs to all managers and employees concerning safety, health and welfare in association with managers and training and development professionals;
- The maintenance of certain safety training records;
- Reviewing safety information systems including signs and signals;
- Provision of advisory and consultation service on occupational safety & health matters;

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by.	James Magill
Version:	2019	Page number:	14 of 21
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- Liaison with the Health and Safety Authority, Vodafone Group, external auditors, trainers, insurance companies, other Regulators and Statutory Bodies;
- Setting safety and health targets;
- Ensures management implement health and safety standards as directed by Vodafone Group;
- Monitor the requirement for resources and review current resources on an ongoing basis to enable the Chief Executive Officer to allocate resources as required.

Facilities or Premises Manager.

In addition to responsibilities detailed elsewhere the facilities or responsible manager has the following responsibilities:

- Maintaining risk assessments for all operations under their remit;
- The management of fire systems, lifts & construction related systems and statutory records including the inspection, test and maintenance of facilities, plant and equipment;
- The ongoing provision of relevant premises related information, to managers, employees, contractors & visitors concerning safety, health and welfare;
- Ensuring safe layout, design and maintenance;
- Consult as required with the Vodafone Ireland Health & Safety Specialist in all matters pertaining to safety, health and welfare;
- Ensure that all safety signs and signals in common areas are correctly sited and checked routinely for adequacy;
- To facilitate and assist in emergency plans and drills etc.
- Management of emergency procedures, fire marshals, occupational first aid and maintenance of first kits.

Supply Chain Management.

Supply chain management is responsible for all safety and health aspects of logistical operations under its remit, especially,

- Ensuring Vodafone Ireland health and safety requirements are included in contract documentation.
- Establish a process to communicate information on hazards risks and requirements to contractors.
- Consult as required with the Vodafone Ireland Health & Safety Specialist in all matters pertaining to safety, health and welfare.

Managers.

Each individual manager is required to manage safety, health and welfare within their remit.

Managers and supervisors are required to account for, investigate and report on accidents or dangerous occurrences within their areas of responsibility.

Managers are required to be fully aware of Vodafone Ireland health and safety policies and to ensure that safety policy statements and safety information is communicated to employees and anyone else who may be affected by Vodafone activities.

They shall also fulfil the following,

- Risk assessments for all relevant operations under their control.
- Direct employees to work in accordance with risk assessments.
- Provide employees with all necessary protective equipment and ensure that it is used.
- Provide supervision of operations to ensure that they are carried out safely.
- Have documented systems to check, ensure and record that work areas are tidy and free from trip, slip or fall hazards and the emergency exits and escape routes are free from obstructions at all times.
- Ensure that only trained, authorised and competent employees operate machinery or undertake any hazardous tasks or processes including manual handling.
- Oversee the evacuation and roll call of their area should an emergency arise

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by.	James Magill
Version:	2019	Page number:	15 of 21
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- Ensure that people working under their control are walked through the emergency procedures and routes on the first day of employment in a new area as part of the induction process.
- Consult as required with the Vodafone Ireland Health & Safety Specialist in all matters pertaining to safety, health and welfare.
- Ensure work equipment is fit for its intended purpose, maintained, checked and all relevant records are retained.
- Report to their Director and the Vodafone Ireland Health and Safety Specialist immediately any accidents resulting in fatality, hospitalisation or a lost workday.
- Investigate accidents and ensure completion of the relevant forms which must be forwarded to the Vodafone Ireland Health & Safety Specialist
- Assess the required health & safety training needs for their department, budget accordingly and ensure take up of training.
- Arrange for or undertake periodic safety and housekeeping audits and checks & maintain the appropriate records.
- Address any issues highlighted by the Vodafone Ireland Health and Safety Specialist.

System Documentation

The system documentation is held on the server system, backed up to a laptop on a daily basis. Significant email communications are exported to the system from the mail client on a regular basis. Hard copy files of significant accidents are maintained in hard copy in the Health and Safety Specialist filing system. A number of procedures and policies have been developed to provide rules and methods for working safely. The format is in line with the Vodafone Ireland template. The procedures are accessible via the Vodafone intranet mechanism. The list of procedures is attached to this document.

The document control process is routed through the Vodafone Ireland Health and Safety Specialist and via the Vodafone Ireland intranet. Communication on health and safety will be channelled through Vodafone Ireland internal communications process

Formal Document Review.

The Vodafone Ireland, Health & Safety Specialist will review this Health Safety and Wellbeing Statement annually and policies and guidance every 2 years or following any significant change in legislation, work procedure, work practice or as a result of any change in hazards or risks. Any significant alteration to the Safety Statement will be brought to the attention of all employees.

Training, Awareness and Competencies

All employees receive induction training when starting employment with Vodafone Ireland. Induction training is relevant to the task to be undertaken and delivered in a suitable format. The Vodafone Health and Safety Specialist is a member of IOSH. The training plan is formed to meet training requirements to meet legal and risk needs and forms part of the planning process. All employees receive induction training as part of the Vodafone Induction process. The training plan is reviewed at least annually. Training records are held in a variety of locations and formats. A variety of communication media as per the communications plan are used to raise awareness. For high risk tasks, such as those involving climbing, a climber passport scheme is in operation. This scheme takes training, health checks and authorisation into account.

Communication and Consultation Communication

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by.	James Magill
Version:	2019	Page number:	16 of 21
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A communication plan will be drawn up annually and reviewed as necessary to ensure that a structured delivery of information in accordance with the health & safety action plan is maintained.

This is designed so that all the audience groups receive the right information at the right time and that employee input is considered with a view to modifying the system or plan.

Safety Signs and Notices

Conform to legal formats where necessary, the main physical presence is the notice boards and the electronic presence is on the intranet and the employee communications channels

Consultation

Vodafone Ireland operates in accordance with the requirements of the Safety, Health and Welfare at Work Act 2005 and associated Regulations relating to employee health and safety consultation which lay emphasis on the need to communicate with all employees, on an ongoing basis, regarding all aspects of safety, health and welfare. Employee consultation in Vodafone Ireland is achieved directly through peer reviewing of relevant material and information within the work area.

Provision of Information.

The Company recognises its duty to ensure that adequate information is provided to employees, contractors and others regarding any risk inherent in the activities of Vodafone Ireland.

The Vodafone Ireland Health & Safety Specialist is responsible for the ongoing generation of information regarding safety, health and welfare at work.

Managers at all levels shall ensure that employees, contractors or other affected persons receive adequate information on the risks to which they may be exposed, as a consequence of their work or as a consequence of any activities of the Company.

Vodafone's intranet mechanism and other methods, as appropriate, will be used to facilitate the cascading of information to employees.

Information on hazards, risks and controls will be brought to the attention of employees as appropriate.

Implementation

Hazard and Risk Management

The Vodafone Ireland high level risk matrix is held on the server.

Risk controls should be determined and implemented in line with the hierarchy of control detailed in the Group H&S Risk Management Guidelines

Safe systems of work exist for the high level risks and are included as part of the policy and guidance documentation.

Permit to Work exists for high risk activities as appropriate such as hot work, abseiling for window cleaning etc.

The method of evaluation must be documented and must Result in a risk rating, Consider the degree of severity and the likelihood of occurrence, Contain a framework for determining control measures, Track implementation of control measures.

Risk controls must be recorded and reviewed for effectiveness as part of an annual review with high risk functions to identify any changes in operations, activities, acquisitions which potentially could impact the Company's HSW risk profile.

Risk controls must also be reviewed, Following an incident, Following a significant process or material change,

Risk controls must be adequately communicated to everyone who may be exposed to the risk. The communication must Be delivered in a language that people can readily understand, Be clear, concise and easily understood, Risk controls should be identified developed and reviewed using a systematic process which includes input from at least the following sources. Those who conduct the task or use the process, The owners of the process, Outputs from risk assessments must be recorded in a risk register, Training on health and safety risk assessment must be provided to those required to undertake this activity.

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by.	James Magill
Version:	2019	Page number:	17 of 21
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Emergency Preparedness and Response Plans

The Vodafone Ireland Health and Safety Policy 028 Emergency Planning and Response is held on the Vodafone Ireland intranet

Fire evacuation drills take place at each major manned site at least annually and a report is completed and held on the server for each drill.

Fire Marshals and First Aid are provided with appropriate training.

Business Continuity falls under the remit of the Business Continuity organisation.

Emergency services are consulted on plans and are invited to visit each major manned location for familiarisation and checking.

Equipment is deployed as determined by assessment of risk and this equipment will be checked, inspected and tested in line with legal and Irish, British and European standards.

Development

Accidents Incidents Reporting and Investigation

The Vodafone Ireland health and safety policy Vodafone Ireland Health and Safety Policy 003, Health, Safety & Environmental Incident Reporting & Investigation is held on the Vodafone Ireland intranet

Major incidents will trigger the Crisis Management Team

Major injury or fatality incidents are to be reported to the Health and Safety Specialist immediately by fastest possible means but within 1 hour in any case.

In the event of a major injury or fatality, a flash report process will be triggered to Vodafone Group Health and Safety Manager. Group resource will be requested to investigate and report.

Contractors and Supplier Control

The Vodafone Ireland Health and Safety Policy, Vodafone Ireland Health and Safety Procedure 018, Contractor Control is held on the Vodafone Ireland intranet

Proactive and Reactive Monitoring

The performance indicators used by Vodafone to monitor measure and record H&S performance are:

- Accident and incident frequency data
- Work related ill-health data

Wellbeing

The Vodafone Wellbeing Programme includes a mechanism for self driven personal analysis and actions.

Vodafone Ireland can draw conclusions about groups of employees and target campaigns to address action areas.

Active Monitoring

Audits and inspections of proposed new workplaces are triggered by Supply Chain Management notification.

Medical monitoring takes place only for employees who climb or work at height.

Audits and inspections in the network area form a normal part of the project process and is logged in safety files.

Prime Construction Contractors are closely monitored and provide audit reports and briefings.

Performance measurement

Perception Measures

The Vodafone employee survey provides valuable data for targeting resources where employees perceive weakness.

External measurement is comparison with other Vodafone operating companies audit results.

Performance Indicators

Key Performance Indicators exist for accidents and incidents. Sickness absence and fleet accident data is reviewed by Health and Safety Specialist.

Network contractors are reviewed in depth on a 12 monthly basis to assure their competence as duty holders under the Safety Health and Welfare at Work (Construction) Regulations 2013.

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by.	James Magill
Version:	2019	Page number:	18 of 21
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Audit, assessment, and management review

Audit and Assessment

Vodafone Ireland recognises that the Health, Safety and Wellbeing Policy requires regular monitoring and auditing to ensure its effective implementation throughout the entire workforce, and will therefore maintain a series of audits and inspections which are designed to measure performance on a pre-determined basis. The annual audit is reported to senior management and Vodafone group in April each year. Specific geographical locations such as Clonsaugh Data Centre's are audited periodically. Risk based audits are conducted in specific subjects, for instance occupational EMF.

Management Review

Health and safety performance is reviewed at least annually by senior management and preferably 6 monthly. Action plans are drawn up for each significant risk area and signed off by senior managers. The consultation mechanism ensures employees are included in the performance review and their views taken into account.

Governance & Assurance

The Operating Company must review the performance of their HSW Framework on an annual basis. As a minimum the review should consider: Legal, statutory and regulatory requirements, Annual HSW Plans, HSW risk profile, Design and operational effectiveness of controls, Feedback and learnings from the investigation of incidents, Risk assessments, Operating Company HRD to submit an annual attestation to Group HSW Director confirming compliance to Group HSW policies and validity of HSW reports. Group HSW will undertake periodic reviews of the Operating Company HSW Framework. Operating Companies must have in place a process to implement, and measure the effectiveness of Actions, recommended as a result of management system reviews. If exemptions to Group HSW policies are required, then a formal exemption request must be submitted to the Group HSW Director.

Corrective and Preventive Actions

Non conformances are identified and investigated as they arise. The response and corrective action will reflect the severity and likelihood of the risk. Significant non-conformances will attract logging, escalation and reporting as appropriate. Systemic and serious non-conformances will be included in the dept and VFI action plan.

Revision history

Rev	Date	Main Changes	Comment
1	1998	Existing Statement	Hardcopy issued
2	1999	Updated to reflect appointment of the H&S Manager	Soft copies
3	June 2000	Tidy –up and numerous minor edits – also issued for Vodafone due diligence	Has been issued to various staff also on CMT dbase.
4.1	Feb/Mar 2001	Inserted in the Lone Worker Rule and updated Electrical Safety aspects	Not on general release
4.2	April / June 2001	Added text added Biohazards section & company driver section	Issued the biohazards section by e-mail to some field guys

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by.	James Magill
Version:	2019	Page number:	19 of 21
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4.3	Oct 2001	Changed CEO name, put in RA for Laser & FO 7.3.16 Changed Group references 8.15	Review with? Print out for new CEO
4.4	Nov 2001	Vodafone (Irl)replaces Eircell in many places	Some lines & paragraphs now messed up
4.5	Dec 2001	Update Construction regs to 2001 & add SI 188 of 2001 general application regs – equipment requirements.	
4.6	Dec 2001	Add in to Ergonomics section ref to LAC94/1 rev on call centre ops.	
4.7	Jan 2002	General edit and add section 2.0 Scope of SS.	Need to cover all sites / mobile working eg
4.8	Mar 2002	Vodafone brand replaces Eircell Vodafone	Completion of new brand
4.9	April 2002	Updated 3.12 manual handling & 4.2.	Reviewed with J Donohue
5.1	June 2002	ADDED IN Mountain View	
5.11	Aug 2002	Updated 9.1 First-aid	Set standards and goals. Inc AED programme.
5.12	Jan 2004	Extensive rewrite. Split into separate documents.	See document held by EHS Manager for extensive detail.
6.00	April 2006	Re-write to accommodate group HSMS requirements and New SHWW Act 2005	See document held by EHS Manager for extensive detail
6.01	Feb 2008	Re-format, New CEO, new design,	Published March 2008
6.02	July 2008	Goals for 2008/2009, serious and imminent danger more explicit, External and Internal audit findings additions. (See audit findings for detail.). Competence matrix added at appendix d Not a significant change in content more a change of style. No widespread comms anticipated but targeted consultation.	Draft
6.03	January 2010	Update with new legislation and re-format.	Draft
6.04	April 2010	Updated Safety Statement and signed off by CEO. Communicated to workforce through internal comms. Updated on Vodafone intranet site.	Signed off by CEO.
6.05	September 2010	Updated with CEO Statement	Updated.
6.06	March 2012	Redesign layout and update with CEO commitment Vodafone Absolute Rules and policies for Working on Third party Sites/ Customer Premises and PSDP & PSCS Roles.	Signed off by CEO
6.07	March 2013	Change include <ul style="list-style-type: none"> • New CEO for sign off on the Commitment & Policy. • Organisation flow chart to reflect Interim changes in Enterprise & Commercial Operations. • Change header font from bold to regular. 	Draft
6.08	May 2013	CEO Sign Off	Signed by CEO
6.09	July 2014	Review and update with new Absolute Rules, aligned with Vodafone Group Health and Safety Policy, new policy on Underground Services - Cables in the Ground Activities, Supply Chain Management Policy and new legislation.	Signed by CEO

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by.	James Magill
Version:	2019	Page number:	20 of 21
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6.10	28 th October 2015	Review and update with minor changes including Absolute Rules, PPE Policy.	Approved by CEO
6.11	26 th October 2016	Update safety statement Update with Vodafone Group electrical policy Include policy on Group Guidance for HS&W G18- Commercial Activities and Events	Draft.
7.01	27 th November 2017	Annual review and update. Update to EMF Policy to align with Vodafone Group requirement	
8.01	11 th January 2019	Updated to reflect and support the environmental policy and aligned with Vodafone Group Health and Safety Policy. New policies are, 009 – Access and Work Approval for High Risk Activities, 012 – Lifting Operations and 039 – Warehousing. EMF Policy amended to reflect minor Vodafone Group update to Management of Radio Frequency Exposure at Work.	Draft
8.02	31 st January 2019	Health Safety Environment and Wellbeing Statement approved by CEO	Approved
8.03	1 st March 2019	Health Safety Environment and Wellbeing Statement Update to include Didier Clavero as Technology Director and removed Max Gasparroni as Interim Technology Director	Published on Hub.

File Name:	Vodafone Ireland Health, Safety and Wellbeing Policy	Policy Owner:	Barry Phillips
File Location	J:\Health and Safety\Safety statement\2019	Approved by:	James Magill
Version:	2019	Page number:	21 of 21
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