




HEALTH, SAFETY AND ENVIRONMENT MANUAL		Document Name SON-HSE-MA-001	
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Author(s) : M. DOS SANTOS 	Controller(s) : J-C. DAUDIN 	Approving Officer(s) : G. DATRIER 	



HEALTH, SAFETY AND ENVIRONMENT MANUAL

SUBJECT MATTER

The purpose of this manual is to describe the steps taken by Sonema to achieve, ensure and constantly improve Health, Safety and Environmental protection measures. The manual describes the structure, roles and responsibilities within company operations. This document constitutes a management tool for health and safety systems at work. Amendments and updates are decided upon according to company developments and objectives.

SCOPE


The document is intended for both internal and external use, including staff members, clients, suppliers and partners.

The manual is written and updated by the HSE Manager. Each new edition of the manual is approved by the Managing Director and the document's index is updated.

The HSE Manager files an original copy of each version of the HSE manual and the out-of-date editions are kept on file for a ten-year period.


REVISION CONTROLS

Index Edition	Description	Page n°s updated	Approval Date
V1	Document creation	/	08/01/2016

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1. MANAGEMENT COMMITMENT



HEALTH, SAFETY AND ENVIRONMENTAL COMMITMENTS

In keeping with Sonema's primary objective of sustainable development, we declare our commitment to:

- Continually improve the safety of the people, equipment and set-up of our sites
- Protect and save the environment

Implementing this strategy requires us to maintain and strengthen the measures undertaken by the company in terms of Health, Safety and the Environment, in particular by means of our action and improvement plans. Amongst other things, we must sustain and expand our efforts to:

- ✓ Comply with all applicable rules and regulations, and where there are no rules, apply fixed standards in a responsible fashion;
- ✓ Meet customer requirements in terms of safety and the environment;
- ✓ Identify, evaluate and reduce risks for Health, Safety and the Environment at work linked to our activities which could potentially affect our staff, clients and subcontractors, as well as our equipment and installations;
- ✓ Purchase and use equipment which meets current safety and environmental standards and specifications;
- ✓ Provide training and awareness programs in all aspects of safety and environmental issues for the personnel on our sites;
- ✓ Control our energy consumption and emissions in order to protect natural resources;
- ✓ Maintain a high level of environmental and safety requirements for our staff, clients, suppliers and sub-contractors;
- ✓ Ensure efficient communication with regards to our set objectives, planned actions and the outcomes to our staff, clients and sub-contractors;

Continually improving our Health, Safety and Environmental results is crucial to us, therefore we must all be involved in fully enforcing and respecting the requirements, procedures and instructions that we have set.

We call upon each member of staff to share these commitments unreservedly and to be involved with their implementation on a daily basis.

Monaco, the 1st September 2015

Gilles Datrier
Managing Director

Bernard Deforme
President

SONEMA - 7, avenue d'Ostende - 98000 Monaco - T. (+377) 93 15 93 15 - F. (+377) 93 15 90 90 - www.sonema.com

S.A.M au capital de 300.000 Euros - R.C.I. 85 5 02162 - NIS 6130 2 01798 - N° Intracommunautaire: FR 09000010669



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2. HSE POLICY



HSE POLICY

Further to its strict compliance with the legal and regulatory measures, Sonema is aware that a high level of company performance and responsibility in the sectors of Health, Safety and Work conditions is, and must be an integral part of corporate policy, contributing to its economic performance. This performance is reflected by a prevention plan and by the upkeep, protection and improvement of health, safety and environmental conditions (HSE) of the employees, and also those of its sub-contractors.

Sonema ensures the safety of all parties involved in our activities through the identification, evaluation and management of risks. Therefore, any work-place accident is considered to be a counter-performance and leads to a structured analysis to reduce the severity and frequency of this type of situation.

Sonema participates in efforts to save the environment by putting into place a waste reduction strategy for its operations and informing its clients and contacts about this strategy.

Sonema respects all relevant local and national regulatory HSE requirements on the sites where it operates.

Sonema is working to create an HSE culture for all and encourages its employees to be responsible for themselves. This allows staff to work in a safe, healthy environment.

This culture allows the HSE structure to be included in decision making as well as in the management of different activities.

The company would like to encourage its clients and partners to follow the Health, Safety and Environmental protection rules and to consider their implementation as an indicator of appreciation of these same rules.

Defining concrete goals and implementing an action plan attest to the company's desire to continually improve the established system. In order to achieve this, results will be regularly measured by way of monitoring and will be made available to anyone who wishes to consult them.

Managers are responsible for implementing the HSE policy within their department. The management team must set a good example through their actions in Health and Safety measures and Environmental protection

As a result, the directors, management, and Sonema staff are familiar with and apply this policy on a day to day basis, at all levels and on all sites.

Monaco, the 1st September 2015

Gilles Datrier

Managing Director

Bernard Delorme

President

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3. GOALS

These goals represent all the decisions taken by the HSE Committee for the purpose of protecting the health and safety of the staff as well as protecting the environment.

1st Goal:

Sonema will expand its recycling programme for batteries and printer cartridges and will recycle paper and cardboard.

2nd Goal:

Sonema is committed to respecting the environment. As a result, it will reduce its energy consumption over a 5-year period. This will also reduce greenhouse gas emissions.

3rd Goal:

As another way of protecting the environment, Sonema will aim to reduce its paper usage over a 5-year period.

4th Goal:

Sonema employees are required to travel between sites for work meetings or assignments.

In a bid to try and reduce the impact of travel on the environment and also the safety risks of these trips, Sonema has decided to use videoconferencing as much as possible to organise meetings.

5th Goal:

Sonema will be involved in all aspects of health, safety and work conditions to improve the health and safety of its staff members and to reduce the amount of sick leave and absences from work.

6th Goal:

Sonema will adopt an attitude of full transparency towards all concerned parties with regards to its HSE Management System.


4. STRUCTURE

A set-up has been introduced within the Management System. This has made it possible to define the roles and responsibilities of the staff members involved in the HSE Organisation.

4.1 – Key Players

4.1.1 – The Managing Director

- Is the guarantor of the HSE policy implementation.
- Takes appropriate actions to ensure the safety and protect the physical and mental health of the employees.
- Promises to reduce the environmental impact of the company to the lowest possible level.
- Approves and enforces the HSE policy as well as the various HSE documents.
- Presides over the company's HSE committee.
- Approves the annual HSE goals and the action plans.
- Makes the necessary resources available to ensure the continuation of the HSE set-up within the company

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4.1.2 – The HSE Manager

- Is directly responsible for the organisation and up-keep of the HSE Management System.
- Carries out a risk assessment analysis in order to identify the risks which are inherent to the company's activity, the risks which the staff, equipment and environment are exposed to, and the actions put into practice by the company to manage these risks.
- Puts forward and updates the HSE policy.
- Ensures that current rules and regulations are enforced.
- Regularly checks the company's safety and environmental results.
- Takes action when problems arise in these fields.
- Establishes an HSE culture.
- Organises audits to monitor company efficiency
- Following work accidents, carries out an investigation with the Head of Department then assesses the cause of the accident and defines efficient steps to avoid the accident happening again.
- Organises the HSE meetings.

4.1.3 – The HSE Leaders

They are the Heads of Department within the company. They establish an HSE culture within their department by ensuring that the procedures and documents issued by their department conform to the HSE policy.


- They train newcomers at their workstation and inform them about risks.
- Ensure that the PPE (Personal Protective Equipment) is properly maintained and works correctly.
- Help draft documents with the HSE Manager.
- Investigate with the HSE Manager when an incident or work accident occurs in their department.
- Take part in the HSE Committee meetings.
- Inform the staff about waste management.
- Within the department, set up the various actions decided upon by the HSE Committee to reach their goals.
- They can be called upon during the implementation of new installations.
- Capitalise upon feedback by installing assessment tools and organising training sessions.

4.1.4 – The Employees

- Must be responsible for their own safety and also that of their colleagues.
- Must keep up to date about new procedures and document updates.
- Must understand and apply the HSE policy.
- Must inform their Department Head about any dangerous situation.

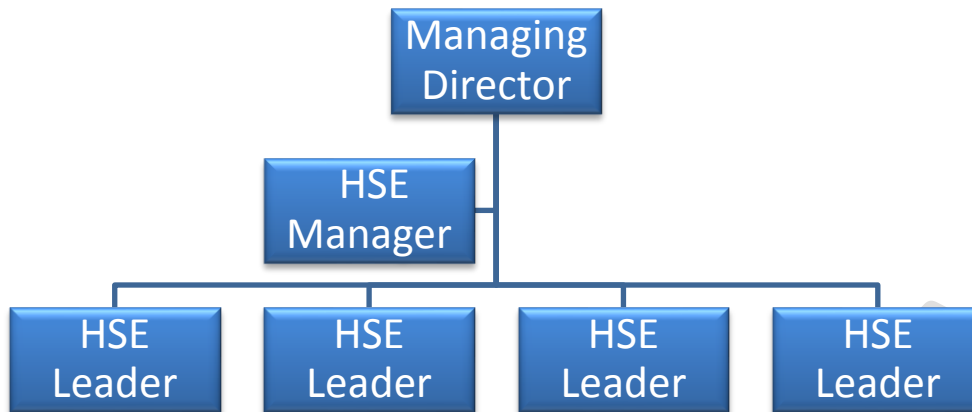
4.1.5 – The Clients, Partners and Visitors

- The company encourages its clients and partners to apply its health, safety and environmental protection rules.
- The company considers the implementation of these rules as an indicator of appreciation.
- Sonema would like its clients and partners to adhere to the HSE policy.

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4.2 – The Structure

4.2.1 – The HSE Structure




4.2.2 – The HSE Committee

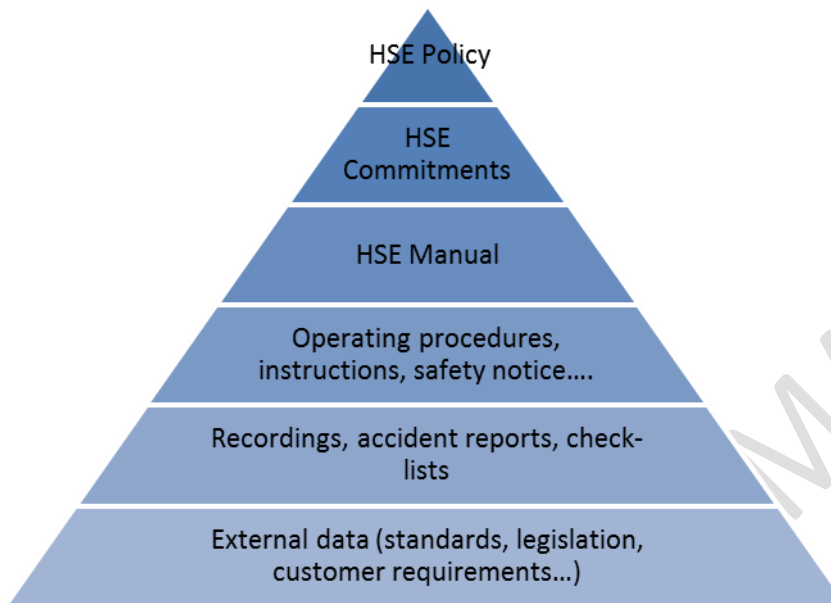
The HSE Committee is made up of Sonema’s Managing Director, the HSE Manager and the various Heads of Department (The HSE Leaders)

Its mission is to ensure:

- The Management System is incorporated within the company.
- The compliance and enforcement of the legislative and regulatory requirements adopted for health, safety and the protection of the environment and to contribute to the prevention of occupational risks.

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5. DOCUMENTARY STRUCTURE



Documentation of the HSE System is primarily accessible on our IT servers. One validated hard copy is available to view in the HSE Manager's office. (The HSE Manager is responsible for keeping this document up to date) There is a file on our network which is entirely dedicated to template documents (files) and states which version of each document must be used.

The focus of the HSE Policy, as outlined in the Management Commitment at its highest level, reflects the company's desire to fully implement its strategy of continual improvement to the HSE system. The policy is shared with the entire staff both directly and by means of posters. It is available for external partners and revised following Management Reviews.

The HSE Manual is written, checked and updated by the HSE Manager and is approved by the Managing Director.


The objective of the operating procedures, instructions and notices is amongst other things to describe, detail or specify certain tasks.

The recordings, accident reports and check-lists show material evidence of the application of provisions and also represent an important link in the installation of the documentary structure.

The external data represents the documents concerning monitoring.

Document up-dates.

The guidelines for drafting and updating the system's documents (applicable documents and registration documents) are outlined in the procedure SON/DGE/PR-001.

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6. REGULATORY AND LEGAL MONITORING

6.1 – Legal Requirements

- Directive 2004/40/CE from the European Parliament and the Council regarding the minimum health and safety requirements pertaining to workers exposed to risks arising from physical agents (electromagnetic fields)
- The French Labour Code which contains legislative and regulatory texts applicable to employment laws.
- The Princely Government Labour Code applicable within the Principality of Monaco.
- The National Collective Agreement of Telecommunications (CCNT) of the 26th April 2000, which enforces the implementation of a prevention policy aiming to identify occupational risks and improve working conditions.
- Decree n°2002-775 of the 3rd May 2002 pursuant to the 12° of article L. 32 of the Electronic Communications and Telecommunications Act and pertaining to public exposure limits for electromagnetic fields emitted by equipment used in telecommunications networks or by radio installations.

6.2 – Regulatory Monitoring

Sonema is structured to carry out regulatory monitoring, which allows us to keep up to date with new regulations. Thanks to this monitoring, the company can establish its regulatory compliance regarding HSE and fully comply with the legal requirements.

The monitoring is carried out in 4 steps:

- Step 1 : Identify the applicable regulations

This step consists of identifying the regulations which potentially apply to the company with regards to its activities, products and the services supplied.

- Step 2 : Assess compliance


This step consists of ensuring the adequacy between the relevant requirements and Sonema's activity. This step highlights any regulatory non-compliance.

- Step 3 : Compliance

This step consists of ensuring compliance for any required actions as well as monitoring the guide-lines.

- Step 4 : Organise and implement the regulatory monitoring

This step consists of ensuring regular updates of statutory texts in order to comply with the law.

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7. COMMUNICATION AND INFORMATION FOR STAFF MEMBERS

7.1 – HSE Meeting

Meetings are scheduled regularly. They are held every 3 months with the HSE Manager and Leaders.

The meeting topics are decided at least one week before the meeting is held. They allow us to improve the organisation of the HSE department and the Sonema Management System. They enable us to identify the strong and weak points of all or part of the system. Their aim is to help advance the system by verifying that all the policy rules are correctly applied in an on-going fashion.

7.2 – Management Review

These are organised every 6 months and bring together the HSE committee.

During the management reviews, specific problems must be addressed such as the policy, goals and the plan(s) of action. These reviews must furthermore allow us:

- To identify the resources needed to achieve the goals
- To implement the improvement initiatives.


The review is an important occasion, during which the HSE committee takes stock of the running and efficiency of the Management System and above all its capacity for improvement.

7.3 – STAFF BRIEFING

Following these meetings, each Head of Department makes a verbal report to his team about their work.

The staff is therefore kept up to date about improvements in their field and can take any necessary measures. The Head of Department must ensure that these measures are carried out correctly and efficiently.

In addition, a general report resuming the important points is produced and displayed on a notice board so as the staff members may be made aware and be informed about the progress of the Management System. All the reports are filed and are available from the HSE Manager.

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8. ABBREVIATIONS

HSE: Health, Safety and Environment


CCNT: National Collective Agreement of Telecommunications

MS: Management System

PPE: Personal Protective Equipment

HSW: Health and Safety at Work

PROPRIETE DE SONEMA

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