



Compliance

Environmental Policy

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1. Summary

Proximus, as a sustainable company, acknowledges that its activities may have an impact on the environment. Therefore, it will help reduce its own and its customers' negative impact on the environment.

This is why Proximus, as a sustainable company, has signed the ETNO1 Sustainability Charter (see annexe).

This policy text outlines the general environmental policy of the Proximus Group.

CPP/ENVIRONMENT has been tasked with the follow-up of this policy.

Unless specified otherwise, this policy is applicable to PROXIMUS SA under public law and to all Proximus subsidiaries of which Proximus holds at least 50% of the shares and which are located in Belgium.

Any failure to strictly comply with this policy may have major adverse impacts on the Proximus Group, as well as on the various people personally responsible (e.g. adverse publicity, legal actions, severe penalties, external investigations, etc.).

2. Parties involved, policy owner, responsibilities

2.1 Parties involved

Within Proximus, the following parties are involved in environment:

- The company: This means Proximus SA and subsidiaries of which PROXIMUS holds at least 50% of the shares.
- The hierarchical line: these are the persons who are leading teams, departments, divisions, etc., others than the person who is as considered as employer. They always exercise a line function, such as line managers and coaches.
- The staff member: Is an employee of the Proximus Group, including:
 - Temporary employees (= temporary agency workers)
 - Students-trainees
 - Job students
- Corporate Prevention & Protection (CPP)

¹ European Telecommunications Network Operators' Association

2.2 Policy owner

The CEO of Proximus SA appointed the Head of Corporate Prevention & Protection as Policy Owner, charged with the following policy responsibilities: organising communication, implementation, compliance monitoring, reporting and updating of this policy.

2.3 Responsibilities

- The company:

All companies must pursue an environment policy (legal obligation). This means the company's overall aims and principles of action with respect to the environment, including compliance with all applicable legal requirements relating to the environment.

That's why each Division of Proximus SA and each of its subsidiaries involved shall ensure that, when carrying out its activities, all those rules relating to the environment are complied with and that goods and services it purchases and/or provides comply with this Policy. It will also assume the costs incurred for this purpose.

- The hierarchical line:

The hierarchical line shall ensure compliance with this policy within its division and at its hierarchical level.

- The staff members:

All staff members shall, during the course of the performance of their duties, support the application and integration of the aspects included in this Policy, as well as in the environmental procedures and instructions of their division.

Corporate Prevention & Protection (CPP):

Within Proximus, CPP is the driving force in the environment field. It draws up the environmental policy and provides guidelines regarding environmental issues within Proximus.

Moreover, a power of attorney is conferred by the CEO to the Head of CPP to fulfill, on behalf of Proximus SA, all administrative formalities in the framework of the application for and/or renewal of environmental and operating permits, environmental declarations, to represent Proximus in procedures and hearings, to make all appropriate statements or to supply all necessary or useful documents, and in general to perform all acts required to obtain an environmental or operating permit. Such powers exist for the subsidiaries involved and for the OLOs (Other Licensed Operator).

CPP will also be in charge of keeping up-to-date the asbestos inventories and the soil investigations and remediations.

3. Policy

3.1 Objectives

Proximus will conduct itself as a sustainable company by paying strict attention to the following objectives:

- Full compliance with the environmental regulations in effect;
- Limiting the use of raw materials and avoiding the production of waste;
- Striving for maximum energy efficiency and CO2 emissions reduction;
- Avoiding/limiting the use of ozone-damaging products;
- Avoiding/limiting the use of hazardous products;
- Striving to act in a socially responsible manner with citizens who come into contact with Proximus's activities; and
- Sensitizing and educating its employees regarding its objectives in the environment domain

3.2 Full compliance with the environment regulations in effect

Regional, national and international authorities have set up a series of rules and administrative procedures aimed at protecting the environment.

Proximus makes the necessary resources available to comply with the relevant environmental regulations.

3.3 Limiting the use of raw materials and avoiding the production of waste

A company such as Proximus will only be able to develop sustainably insofar as it strives to minimize the use of raw materials. For this reason, Proximus must make every effort to:

- use the quantity of paper, materials and raw materials within the company as efficiently as possible, and where possible, avoid and/or limit their use;
- optimising the use of raw materials, e.g. by electronic management and exchange of documents, e-billing, televideoconferences, etc.;
- reduce the quantity of packaging for the products it purchases, as well as minimise the packaging of products it puts on the market.

3.4 **Striving for maximum energy efficiency and CO2 emissions reduction**

The maintenance and further extension of the Proximus network requires large quantities of energy (such as electricity, gas and fuel).

Proximus takes all the measures that are required to systematically improve its energy efficiency and to reduce its CO2 emissions.

According to the ETNO guidelines, Proximus will define objectives in order to apply greener practices, to reduce its energy use and to limit the impacts of its activities on the greenhouse effect.

Moreover, Proximus will limit the amount of transportation by car, which has a direct impact on the reduction of fuel usage and on the emissions.

3.5 **Avoiding the use of ozone-damaging products**

For the air conditioning in its technical rooms and administrative buildings, Proximus strives to use cooling systems in a responsible manner, both in terms of quantity and the choice of cooling gases.

Proximus aims to phase out the use of hydrofluorocarbons (type R22) and replaces them with more environmentally friendly cooling gases.

3.6 **Avoiding the use of hazardous products**

Hazardous products can lead to environmental damage or accidents that can injure our employees or third parties.

Proximus aims to reduce the purchase and use of all hazardous products, and if their use cannot be avoided, it applies the necessary safety and environmental measures. More details about this can be found in the policy "Well-being at work."

3.7 **Social responsibility**

As a sustainable company, Proximus strives, in the exercise of its activities, to treat every citizen, person, authority, who comes into contact with Proximus with respect.

This is why Proximus makes the necessary effort to keep disturbances (sound, traffic congestion, etc.) caused by its activities to an absolute minimum.

Proximus examines every complaint about potential (environmental) disturbances filed by any impacted parties.

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4. Implementation

Awareness campaigns, training and communications on behalf of the hierarchical line and staff members will be organized in order to enforce this Policy.

5. Annexes

5.1 ETNO Sustainability Charter

The Sustainability Charter of the European Telecommunications Network Operator's Association

5.1.1 Our vision

Sustainable development is a global strategic goal, which seeks to achieve economic growth that promotes a fair and just society while conserving the natural environment and the world's scarce, non-renewable resources for future generations. It is our belief we can play an important part in making this happen.

Corporate Social Responsibility also needs to be understood in the context of sustainable development:

Corporate Social Responsibility is the business contribution to making sustainable development happen, through the proactive management of a company's environmental, social and economic impacts.

This Charter embodies our commitment to sustainable development via:

- a sustainable provision of products and services with significant environmental, social and economic benefits;
- a determined effort to integrate our business activities with environmental, social, and economic responsibilities — minimizing, where practicable, any negative impact these activities may generate.

5.1.2 Our Approach

We believe, as do our employees, customers, shareholders and governments, that today's world demands close attention to business principles and ethics, employee relations, human rights, environmental management, community investment and general working conditions, within a company and regarding its outside suppliers.

Collectively, these activities form the basis for Corporate Social Responsibility (CSR).

CSR commitment demands regular performance assessment. Thus, our reports offer stakeholders a means to judge how effective our improvement programs have been. Moreover, the spread and reach of telecommunications across contemporary society imposes on us, as responsible corporate citizens, the social obligation to demonstrate this commitment, to reflect how we run our businesses.

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Collectively, our companies' combined turnover represents a significant proportion of European trade, which offers a unique opportunity for ETNO member companies to co-operate actively with policy-makers and Governments to make a real difference. Indeed, our CSR activities can offer a significant contribution to sustainable development.

5.1.3 **Our Pledge**

We, as Charter signatories, whether individually or collectively, are committed to continuous improvement and the sharing of best practice via action in the following areas:

5.1.3.1 **Awareness**

To acknowledge all the relevant environmental, social and economic impacts of our products and services: whether positive or negative. In particular we will build CSR aspects into company communications and training programs.

5.1.3.2 **Regulatory compliance**

To achieve full compliance with all relevant legal requirements and, where appropriate, to exceed them.

5.1.3.3 **Research and development**

To support research and development into the contributions that new telecommunication products and services can make to sustainable development.

5.1.3.4 **Procurement**

To implement efficient management of resources, energy use, waste, emissions reductions, environmentally friendly process and product requirements; eliminating use of hazardous materials; observation of human rights and labor conditions.

5.1.3.5 **Accountability**

To make available to all stakeholders' material data, case-study examples and information about our environmental, social and economic performance, as accountability and transparency are key elements of CSR.

To maintain an inclusive approach to stakeholder relationships in order to reflect their aspirations and needs in our business activities.

5.1.3.6 **Cooperation**

To co-operate constructively with governments, customers, industry partners, civil society and international organizations when investigating, developing and promoting the benefits that information and communications technologies generate for sustainable development.

5.1.3.7 Management systems

To offer a statement of business principles, an environmental policy, the appointment of a management board member with specific CSR responsibilities, and a manager(s) with designated responsibility for co-coordinating programs of continuous sustainability improvement.

Finally, to implement management systems that support development of appropriate and well-structured programs on environmental protection, labor conditions, occupational health and safety and social accountability.

5.1.3.8 Employee relations

To create work environments that promote the work-life balance, professional development, diversity and health and safety; maintaining a highly motivated and productive workforce.