



PHOENIX TOWER
INTERNATIONAL

**DRAFT ONLY
PHOENIX TOWER
IRELAND LIMITED
SAFETY
STATEMENT**

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Section 1. Introduction and Business Context

This safety statement sets out the safety management system of Phoenix Tower International, comprised of 8 Irish subsidiary companies which are listed in Appendix 2 of this document, having registered address at 10 Earlsfort Terrace, Dublin. These Irish entities are wholly owned subsidiaries and part of the Phoenix Tower International Group

Phoenix Tower International has built a substantial presence across the United States, Latin America, the Caribbean, and Europe, with a total portfolio of over 100,000 telecommunications sites.

Phoenix Tower International's provides telecommunications infrastructure across the island of Ireland. We focus primarily on the development and management of tower sites to meet the requirements of the wireless communications industry.

Our employees and contractors carry out a broad range of work activities in our portfolio of over 2700 sites and 3000 points of presence. We work closely with telecommunications designers and contractors to design, build and maintain our sites. Our customers also send workers to our sites to carry out construction and maintenance activities.

The Safety, Health and Welfare at Work Act, 2005, requires that Phoenix Tower International provides, in so far as is reasonably practicable, a safe place of work for all our employees and for others, including external contractors and members of the public who may be affected by our business activities.

Phoenix Tower International, as an employer, holds ultimate responsibility for the management of health and safety. The duties and responsibilities together with appropriate authority are delegated to the Operations Manager, Mr Paul Williamson, who together with the Health and Safety Manager, Mr John Brophy will provide leadership for the management of safety throughout our activities.

Everyone in Phoenix Tower International has a part to play in ensuring a safe and healthy workplace.

This safety statement is a high-level document which sets out Phoenix Tower International's policy and outlines the safety processes and procedures for the successful management of safety, health and welfare across our operations. The intention is to refer out to all relevant safety documents both internal and external via the master document list. Any documents, which are referred to are to be understood as being part of Phoenix Tower International's safety management system.

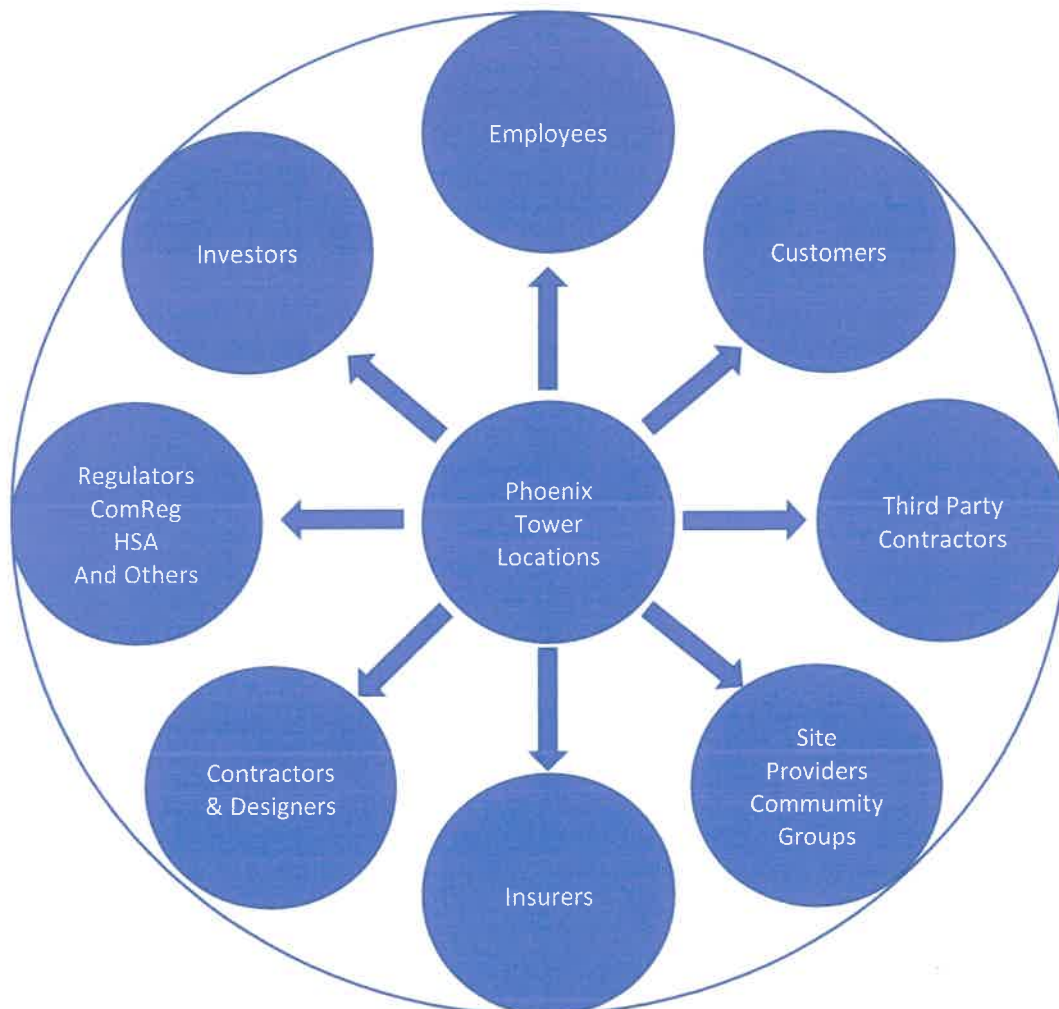
Our safety management system complies with the international standard for the management of health and safety, ISO 45001:2018. The relevant clauses of the standard are referred to throughout the documents of the safety management system.

This safety statement is addressed to every employee. It is also addressed to our customers, our contractors and others who visit our sites. The success of this document will depend on your co-operation. It is therefore important that you read it carefully and refer to any other documents which are relevant to your work. You should fully understand your role in achieving health and safety in the workplace.

A copy of the safety statement is made available to all employees. It will also be available to others who have reason to be on our premises.

1.2 Stakeholders and Other Interested Parties

Phoenix Tower International operates in a rapidly changing and evolving technological environment. While we have a relatively small number of employees, our business footprint is extensive and may expand in the future. Many of our core business activities, in terms of design and build, have been placed with external designers and contractors. We recognise that our legal duties as a client are an essential part of managing safety during the acquisition, design and construction processes. Phoenix Tower International drives best practice in the inspection and maintenance of our sites, which provides ongoing safe working conditions for our own contractor and third-party contractor employees. Our customers are telecommunications mobile industry network operators who are co-located on our structures. Our site access process ensures that jobs are scheduled to minimise the risks which arise during multi contractor operations.



The telecommunications regulatory environment is complex and is enforced by state agencies such as the Communications Regulator, the Health and Safety Authority, Local Authorities and Environmental Agencies among others. Phoenix Tower International has committed to comply with all relevant legislation as a minimum and to actively engage with regulatory agencies.

Phoenix Tower International will regularly interact with all stakeholders and interested parties to gather information on their needs and expectations and to ensure that our health and safety management system is capable of addressing those needs and expectations. (ISO Ref. 4.2)

1.3 Scope of the Health and Safety Management System

The Phoenix Tower International safety management system applies to all of our business activities. It's primary focus, is to fulfil our duties as an employer so as to protect the health and safety of our employees. We also recognise our duty to ensure that our sites are as safe as is reasonably practicable. Our acquisition, design, construction and maintenance activities will ensure that safety considerations are integrated into the associated processes. (ISO Ref. 4.3)

1.4 Provision of Resources

Phoenix Tower International will take a positive approach to safety by providing adequate resources both human and financial, and by issuing any necessary reasonable directives to ensure that the safety policy is fully implemented. Investment decisions for safety resources will be taken using a risk based approach.

Section 2. Assignment of Roles and Responsibilities

2.1 Organisation for Safety

The Safety, Health & Welfare at Work Act, 2005 requires that the safety statement must include the names of those responsible for the performance of tasks assigned to them. In compliance with this requirement, a listing of the managers and other staff together with their responsibilities and duties are set out below. (ISO Ref. 5.3)

2.2 Safety Management Structure

The Operations Manager, Mr. Paul Williamson has overall responsibility for the implementation of policy on safety, health and welfare in the Company and for ensuring that the Company meets its statutory obligations, as set out in the Safety, Health and Welfare at Work Act, 2005 and associated legislation.

The arrangements for the effective planning, organisation, control, monitoring and review of health and safety are the responsibility of Senior Management. Attainment of the aims and objectives of our health and safety policy is achieved through delegation of authority to appropriate levels.

2.2.1 Operations Manager

The Director of Regional Operations, Mr. Kyle Hargrave, is responsible for the execution and maintenance of the Corporate policy for safety, health and welfare by:

- Taking a direct interest in the policy and positively supporting any person whose function it is to carry it out.
- Ensuring that all managers implement the policy in areas under their control.
- Periodically appraising the effectiveness of the health and safety policy.
- Ensuring his own responsibilities, and those of other persons concerned with the effectiveness of the policy, are reviewed regularly as circumstances dictate.
- Ensuring that 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 on-going basis.
- Providing the necessary resources for the effective implementation of the policy and ensuring that such resources are reviewed regularly.
- Reviewing and setting objectives for the health and safety management system.

2.2.2 Safety Consultation and Participation

The Operations Manager together with the Health and Safety Manager will oversee employee consultation and participation throughout the organisation. Phoenix Tower International is a flat organisation with just three reporting levels. Employees work alongside their managers in the office. Consultation will be direct between managers and employees.

The Group will:

- Promote consultation and communication internally and externally at all levels
- Implement management programmes and processes to support Health and Safety Policy
- Facilitate a positive health and safety culture
- Ensure that health and safety is integrated into business processes
- Set and review objectives for health and safety
- Support continual improvement

(ISO Ref. 5.1)

2.2.3 Directors and Managers

It is a primary responsibility of Managers to ensure that health and safety factors are fully taken into account in their work programmes and that proper planning of work includes safety provisions as an integral part of the preparations. Managers are directly responsible for the safety, health and welfare of employees under their control, especially regarding the implementation of the requirements of this Safety Statement.

Directors and Managers are responsible for:

- Fulfilling their obligations as specified in this Safety Statement.
- Liaising with, and being available for, consultation with employees.
- Supervising operations to ensure that they are carried out safely and in accordance with company procedures so as to minimise risk to the general public.
- Ensuring that workplaces are safe and tidy and free from trip, slip or fall hazards and that emergency exits and escape routes are free from obstructions at all times.
- Ensuring that employees are appropriately trained and adequately instructed prior to undertaking any work procedure.
- Ensuring that arrangements are implemented to provide employees under their control with personal protective equipment and clothing necessary to undertake their work safely and as required by any statutory provision and ensuring that arrangements are in place to calibrate, inspect, maintain and replace such equipment as necessary.
- Overseeing the evacuation of their area in the event of an emergency situation.
- Co-operating with the Health and Safety Advisor in all matters pertaining to safety, health and welfare.
- Reporting any incident, accident or dangerous occurrence to the Health and Safety Advisor without undue delay.
- Providing employees under their control with all relevant information and instruction pertaining to Health and Safety.

2.2.4 Health and Safety Advisor – John Brophy

The role of the Health and Safety Advisor will be to oversee the development, implementation and maintenance of the Health and Safety Management System. The main responsibilities for the Safety Advisor are as follows:

- Provision of advice to management and employees at all levels on matters relating to health and safety.
- Provide support and input to the Strategic Safety Group
- Ensuring that the safety statement and supporting documentation is up to date and in accordance with all relevant legislation and best practice.
- Ensuring that all employees have access to the Safety Statement and associated documents.
- Monitoring the regulatory environment and liaising with regulatory agencies and other bodies on matters pertinent to Health and Safety.
- Investigation of serious accidents, incidents, near misses or dangerous occurrences.
- Carrying out system and field level audits and assigning corrective actions
- Monitoring and measurement of safety performance including accident data and audit results.
- Oversee management of the Health and Safety Management System.
- Provision of reports to senior management.
- Ensuring that consultation and participation arrangements are in place and implemented so that all employees, including managers, are afforded an input into safety matters.
- Ensuring that all records relating to the Health and Safety of staff are maintained.
- Assisting in the development of safety training courses in consultation with managers.
- The development of emergency procedures and plans.

2.2.5 Duties of Employees

Employees have a duty to work safely at all times and to observe all procedures which are in place to ensure their safety, health and welfare and that of contractors, visitors or others who may be affected by their actions, whilst at work.

Employees are responsible for:

- Complying with the relevant statutory provisions, as appropriate, and taking reasonable care to protect their safety, health and welfare and the safety, health and welfare of any other person who may be affected by the employee's acts or omissions at work.
- Ensuring that they are not under the influence of any intoxicant to the extent that they could be a danger to themselves or others while at work.
- Co-operating with the employer to such an extent as will enable the Company to comply with all relevant statutory obligations.
- Not engaging in improper conduct or other behaviour that is likely to endanger their own safety, health and welfare at work or that of any other person.
- Attend training courses, and, as appropriate, undergo such assessment as may reasonably be required or as may be prescribed relating to safety, health and welfare at work or relating to the work carried out by the employee.
- Having regard to the training and instructions given by the Company, and ensuring correct use of any article or substance provided for use by the employee at work or for the protection of his or her safety, health and welfare at work, including protective clothing or equipment
- Reporting immediately to their Line Manager, any defects which they become aware of in the workplace, which might endanger safety, health or welfare.

- Reporting immediately any incidents, accidents, near misses or dangerous occurrences to their Line Manager.
- Employees must notify their employer immediately if they become aware of any medical condition which may affect their performance at work that could give rise to risks to the safety, health and welfare of themselves or other persons at work.

2.3 Disciplinary Action

Phoenix Tower International Management have given their full commitment to providing in so far as is reasonably practicable a safe place of work for all employees, and in so doing, expect co-operation from all employees in matters relating to health and safety at work. Any member of staff, who contravenes company safety policies and procedures; may be subject to the company's disciplinary procedure.

SECTION 3: HEALTH & SAFETY MANAGEMENT PROGRAMME

Phoenix Tower International operates an integrated health and safety management system which is based on a core set of management processes, risk assessments, safe systems of work and associated training courses. The system sets out the health and safety expectation at an operational level and addresses the specific hazards and associated risks involved in our operations.

3.1 Integrated Health and Safety Management System

The Phoenix Tower International Health and Safety Management System is compliant with the ISO 45001 Safety Management International Standard. The management system is based around the Plan, Do, Check and Act model.

The international standard requires that core safety management processes are established, which comply with the sub-clauses of the standard. A list of the core management processes which are linked to the associated document is set out in Appendix 2.

The health and safety management system facilitates the company in developing, implementing and maintaining policy and objectives which meet and exceed the Company's legal environmental and health and safety obligations.

3.1.1 Hazard Identification, Risk Assessment and Control

Hazard identification, Risk Assessment and Control is the core of the Safety Management Programme. The risk assessment programme allows for the systematic identification and assessment of hazards in the workplace. The intention of the risk assessment activity is to identify hazards in the workplace or those which arise due to work activities and to develop and implement appropriate risk controls so as to eliminate hazards or to reduce risk to a level which is As Low As is Reasonably Practicable. (ALARP). The methodology for risk assessment is set out in the core management process for Hazard Identification, Risk Assessment and Determining Controls.

Phoenix Tower International recognises the importance of the hierarchy of controls and will emphasise the implementation of an elimination / substitution risk strategy wherever reasonably practicable.

Ongoing hazard inspections are carried out periodically to ensure that risk assessments are kept up to date and controls are adequate. The full set of risk assessment activities and a sample risk assessment is set out in Appendix 3.

3.1.2 Emergency Planning

Section 11 of the Safety Health and Welfare at Work Act 2005 requires employers to prepare and revise adequate plans and procedures to be followed, and measures to be taken in the case of an emergency, and that employers must provide the necessary measures for firefighting and the evacuation of employees and any other individual present in the workplace.

It is the policy of Phoenix Tower International that all adequate provisions are put in place for dealing with all emergency situations.

The following measures have been implemented:

3.1.2 First Aid.

Safety, Health and Welfare at Work (General Application) Regulations 2007 require that adequate provision are in place for dealing with emergency situations where employees or other persons are injured at work. The Health and Safety Advisor will co-ordinate the implementation of first aid procedures by:

- Overseeing the appointment of Occupational First Aiders as indicated by risk assessment and Health and Safety Authority Guidance.
- Advising on the provision of notices for posting the names and telephone numbers of First Aiders.
- Ensure training in first aid is provided to appointed persons
- Ensuring that Occupational First Aid Certificates are updated and refresher training is provided at approved intervals.
- Reviewing as required the numbers of occupational first aid accredited persons and recommending any changes to that number based on risk assessment.

Occupational First Aiders will check the contents of First Aid Kits on a monthly basis.

3.1.3 Fire Safety

A comprehensive suite of preventive and emergency procedures have been prepared by the Health and Safety Advisor to ensure a co-ordinated response to any fire emergency.

3.1.4 Fire Safety Manager and Responsible Persons

John Brophy has been appointed as Fire Safety Manager for our Headquarters premises..

The responsibility of the Fire Safety Manager is to ensure that all relevant aspects of the Phoenix Tower International policy on Fire Safety Management are implemented in the building. He or she should liaise with co-tenants, as required, to ensure co-operation.

The Fire Safety Manager must make the following arrangements with the Building Manager:

- Appoint a Fire Marshal..
- Ensure that the Fire Marshals are trained in their roles.
- Ensure that the Fire Marshal is provided with all relevant information on fire safety and fire prevention.
- Ensure that the HQ Building Manager arranges a fire emergency evacuation drill at least once a year and that all Phoenix Tower International personnel co-operate with this drill.
- Ensure that a report on the fire drill is completed
- Ensure that the Building Manager arranges for statutory requirements regarding the provision and maintenance of fire equipment or practices to be adhered to and those certificates of maintenance of equipment as required by legislation are made available for inspection.
- Ensure that recommendations from the Building Manager are attended to and implemented as necessary.

3.1.5 Fire Drills

Phoenix Tower International policy requires that a full fire emergency evacuation drill be held at least once a year in the headquarters building. It is the responsibility of the Fire Safety Manager for the building to ensure that this requirement is met. The drills are organised and co-ordinated by the Building Manager: A record of the fire drills will be maintained.

3.1.6 Maintenance of Fire Detection and Fire Fighting Equipment and Emergency Lighting

Testing and maintenance of fire detection, firefighting equipment and emergency lighting is arranged by the HQ Building Manager in accordance with relevant Irish Standards. The objective of this programme is to ensure that all equipment will operate correctly in emergency situations and to ensure that any defects identified are prioritised and rectified urgently.

Reference Documentation

Fire Services Act, 1981

Safety Health and Welfare at Work Act 2005

3.2 Determination of Legal and Other Requirements

The Health and Safety Advisor monitors changes in safety / environmental legislation, guidance and codes of practice issued by regulatory authorities. The Phoenix Tower International safety statement and associated documents, processes and records are maintained in line with legislation. A register of legislation is provided through an online register, which also provide updates on relevant environmental legislation.

3.4 Communication

Phoenix Tower International recognises its duty to ensure that adequate information is provided to employees, contractors and others regarding any risk inherent in its activities. The Health and Safety Advisor 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. Communication will take the form of:

- Training
- Management Reports
- Meetings
- Presentations and briefings
- Induction and training
- Safety Alerts
- Internal communications
- Emails
- Phone conversations
- Small Messaging Service (Texts)

Visitors to Phoenix Tower International sites and premises will be made aware by the Phoenix Tower International representative or site Access Office of site specific safety and environmental considerations, as necessary.

3.5 Audit and Corrective Action

The health and safety management system is based on a Plan, Do, Check, Act approach. In this context, regular monitoring and auditing is carried out to ensure the effective implementation of good safety practice. The implementation and effectiveness of the safety management system is monitored through a comprehensive audit programme which measures safety performance and compliance.

3.5.1 Internal Audits

Phoenix Tower International monitors the implementation and effectiveness of the Safety Management Programme through an auditing programme which tests all elements of the system on an annual basis. The programme sets out the frequency and type of auditing which takes into account aggregate risk and levels of activity. The different types of audits carried out are set out below.

3.5.1.2 Internal Integrated Management System Audits

An internal management system audit is carried out on the Integrated Management system once per year. The purpose of this audit is to ensure that the procedures which make up the system are working effectively.

3.5.1.3 Safety Compliance Audits on Phoenix Tower International Contractors

The Safety Advisor and managers will carry out field safety audits on Phoenix Tower International contractors. The number of audits carried out will reflect the level of contractor activity in a quarter.

3.5.1.4 Site Safety Audits

A representative sample of sites will be audited on a quarterly basis.

3.6 Corrective Action

Non-conformities will normally be identified through internal or external audit, risk assessment, staff/ management report a non-conformity or as findings of an incident/accident investigation. Each non-conformity will be investigated to determine the cause and appropriate corrective action to be taken so as to prevent recurrence. Non-conformities and associated corrective actions are recorded on an excel file in the audit plan folder on the server.

3.7 Accident and Incident Reporting

Employees must report all accidents or dangerous occurrences to their manager who will in turn report to the Managing Director and the Health and Safety Advisor

It is Phoenix Tower International policy to investigate and report on all incidents, accidents, near misses or dangerous occurrences so as to identify the immediate and root causes of incidents and to prevent recurrence. The Accident Investigation and Reporting Procedure ensures that accidents incidents and dangerous occurrences are consistently reported, recorded systematically and competently investigated.

Reports and investigations shall be carried out in accordance with legal requirements. All Phoenix Tower International employees will fully comply with any accident/incident investigation carried out internally or by, or on behalf of any statutory body. On occasions where the Health and Safety Authority (HSA) investigates an accident, all employees must co-operate fully with the investigation.

The need for and the extent of the investigation will depend on the seriousness of the accident and the following factors:

- Injuries, if any, sustained
- Potential for injury
- Number of People affected
- Risk of recurrence
- Whether such incidents have occurred before
- Possible legal consequences

The investigation will be carried out by the Health and Safety Advisor in conjunction with the Line Manager. The full co-operation of all employees involved is required. The investigation will analyse both immediate causes and root causes. a report will be produced which will include recommendations and corrective actions to prevent recurrence.

3.8 Personal Protective Equipment

The *Safety, Health and Welfare at Work (General Application) Regulations 2007*, Chapter 3 of Part 2, no. 62-67, stipulate that PPE must be provided where risks at a place of work cannot be avoided or sufficiently limited by technical means of collective protection or by measures, methods or procedures of work organisation.

Phoenix Tower International provides and maintains suitable Personal Protective Equipment (PPE), where it is not reasonably practicable to control or eliminate a particular hazard or risk in the workplace.

We recognise our responsibility to provide employees with personal protective equipment which:

- Complies with the relevant National and International standards
- Is suitable for the risks involved in the work
- Takes account of the conditions at the place of work
- Is suitable for the wearer and the work to be done

It is mandatory for employees to wear the correct Personal Protective Equipment for the category of work being undertaken.

Certain items of personal protective equipment require inspection by a competent person at defined intervals. Such inspections, where required are specified in the relevant risk assessment. Records of inspections by competent persons are maintained on the Construction server.

Employees must not undertake any work where the requisite Personal Protective Equipment has not been provided or where it has become unserviceable. Employees are obliged to report defects in Personal Protective Equipment to their manager and request a replacement as appropriate.

Managers are responsible for ensuring that appropriate PPE is worn by their teams and they shall not, under any circumstances, direct or permit any employee under their control to undertake work where mandatory Personal Protective Equipment is not available.

3.9 Field Safety Management Systems

Phoenix Tower International has developed field level safety management systems in the form of an online manual for employees who work in the field. The manual is based on the identification of hazards and the assessment and control of risks arising out of work activities. Comprehensive and structured guidance is set out on the safe systems of work which will protect employees against the most commonly encountered hazards and hazardous activities in the workplace. The intention of the manual is to provide practical information so that employees are aware of risks and the steps that must be taken to achieve a high standard of safety when carrying out work.

All employees must read their safety manual and be familiar with those sections which are relevant to their work.

3.10 Construction Safety Management System

The Phoenix Tower International construction safety management system sets out the process which employees must follow to meet our obligations under the Construction Regulations (2013).

The system details the evidence which design and construction contractors must supply in order to be approved to work for or on behalf of Phoenix Tower International as well as specifying standards for certain activities. It is designed to:

- Ensure that Phoenix Tower International representatives understand the procurement, design and management requirements of the Construction Regulations (2013)
- Ensure that only competent designers, contractors, Project Supervisors Design Process (PSDP) and Project Supervisors Construction Stage (PSCS) are selected to work for Phoenix Tower International.
- Ensure that all contractors undertaking design or construction work understand the safety requirements and are competent and equipped to work safely on all our sites and on lands owned by third parties which are adjacent to our sites.
- Ensure that contractor employees are safe while working on our sites and that our customers, visitors, members of the public and our employees are also safe.

The process has four distinct stages:

1. Appointment of the Phoenix Tower International Representative
2. Selection and evaluation of the competence of designers, contractors, Project Supervisors Design Process (PSDP) and Project Supervisors Construction Stage (PSCS). Formal appointment of PSDP and PSCS.
3. Planning the work. The Phoenix Tower International representative will formally notify the Health and Safety Authority for all notifiable construction projects and fulfil the duties which are set out in the Phoenix Tower International Construction Safety Management System document. See link below.
4. Management and review of work

Further detailed guidance is contained in the reference document set out below.

Phoenix Tower International Construction Safety Management System

3.11 Procurement – Purchasing Controls

The purchase of equipment, plant, services and substances is subject to the provisions of The Safety Health and Welfare at Work Act 2005. All Managers involved in purchasing shall observe the following procedure prior to accepting chemicals, or products into the Company:

Establish if there is any existing risk assessment covering the item to be purchased. Where no risk assessment exists, the item should be subjected to an assessment, with the assistance of the Health and Safety Advisor to determine:

- All hazards associated with the item.
- The frequency of exposure to the hazards.
- The consequences of contact or exposure.
- The level of risk as a result of exposure.
- The necessary control procedures to be adopted.

In the case of chemical substances, the risk assessment must include the examination of the Material Safety Data Sheet, which should be requested from the supplier, as well as information on any less harmful alternatives.

Where practical, all goods purchased shall comply with, and be certified to, a relevant Irish, European or British Standard, or their equivalent. Equipment, which comes within the scope of Directive 93/38 EEC, shall comply with the provisions on standards and specifications therein.

The Manager responsible for purchasing is also responsible for ensuring that all necessary controls, including training, are put in place, as a result of the risk assessments, and that the safety procedures are communicated to all relevant managers and employees.

3.12 Non-Ionising Radiation

Phoenix Tower International has put in place a comprehensive set of risk controls to ensure that employees are not exposed to unsafe electromagnetic fields (EMF) emitted by radio base stations and radio transmission sites. Electro-magnetic fields may also be referred to as Non-ionising Radiation (NIR). Unsafe levels of NIR are defined as those that are in excess of the limits specified in the guidelines published by International Commission on Non-ionising Radiation Protection (ICNIRP).

Most radio base stations sites are designed to be safe for normal access. All approaches to base stations and control rooms should be outside of the exclusion zone of any antennas or transmission dishes on the site. Where Phoenix Tower International employees encounter equipment on access routes, which can occur on rooftop sites, the relevant operator should be asked to justify the antenna / dish location in the context of NIR levels. Pending measurement of the NIR, employees must not enter the exclusion zones adjacent to the antenna.

Detailed guidance on the effects of NIR and working safely on radio sites is set out in Phoenix Tower International Safety Manual documents

SECTION 4: HEALTH AND SAFETY CONSULTATION AND PARTICIPATION

4.1 Consultation

Phoenix Tower International recognises that a successful safety culture can only be achieved when management and employees work together. We implement an active policy of consultation and participation which recognises the contribution which employees can make to health and safety, and which lays emphasis on the need to communicate with and provide information to all employees, on an ongoing basis, regarding all aspects of safety, health and welfare. Phoenix Tower International has a small number of employees which makes it possible for direct two way communication to take place. Employees are encouraged to raise health and safety issues with their manager and, if possible, those discussions will be acted upon. Employees will be invited to attend at the Phoenix Tower International quarterly safety meeting to make representations on particular issues. Employees will not suffer any disadvantage as a result of raising a health and safety issue.

SECTION 5: TRAINING

5.1 Training

Phoenix Tower International recognises its obligations, under the Safety, Health and Welfare at Work Act 2005, to provide adequate and relevant training to all employees and managers, including part-time employees, to ensure that they fully understand the hazards and risks of their work and the necessary controls which are in place to eliminate or reduce the risks associated with each hazard.

Training needs analysis will be carried out by the Health and Safety Advisor following consultation with relevant line managers and will, as a minimum, ensure compliance with statutory requirements. The training schedule will be revised every 12 months or as required following a process, which will take into account:

- Changes in legislation or the introduction of new legislation in the previous 12 months
- Changes in regulatory guidance or the introduction of new guidance
- Changes in safe systems of work
- Training deficiencies highlighted as a result of an accident
- Training deficiencies highlighted during safety inspections or as a result of reports received from managers

It is the responsibility of each Manager to ensure that staff are appropriately trained and that they are released for safety training as required.

5.2 Training Programmes

Training is available to all employees and managers to provide them with the necessary skills and knowledge thereby enabling them to work to the required safety standards. Formal training programmes are established covering the following five key headings.

5.2.2 Specific Task Training

Training provided to employees and managers detailing the specific safety controls and procedures for defined tasks and processes.

5.2.3 Specialised Training

Where necessary and following the identification of special needs, training will be provided to any relevant employee or manager to enable them carry out their work in a safe and healthy manner.

5.2.4 Refresher Training

Refresher training is provided as required by legislation or as determined during risk assessment.

5.2.6 Informal Training / Communication

Apart from the development of formal training programmes, a strong emphasis will also be placed on informal training which will include the following:

- Employee Briefings
- Emergency drills
- Promotional material
- Regular updates

Section 6. Welfare and Wellbeing

6.1. Violence and Aggression

Phoenix Tower International is fully committed to prevent any incident in which an employee may be abused, threatened or assaulted in circumstances relating to their work.

An important element of this requirement is that all employees know how to report incidents of this nature. Phoenix Tower International defines violence and aggression at work as circumstances where employees are verbally abused, threatened or assaulted in circumstances related to their work.

Victims of violence and aggression can suffer both immediate and long term effects. Both physical and psychological, the physical effects when an incident occurs which may require medical treatment and the psychological effects which may result in loss of confidence or morale and stress.

Where there is a foreseeable risk of violence or aggression. Managers in consultation with the Health and Safety Manager will assess any such risk which could result in staff being exposed to physical or verbal abuse when undertaking their work. Having completed the assessment, the line manager will specify appropriate measures to avoid or minimise the risk. The purpose of this risk assessment is to find out if there is a problem and how serious it is by identifying the hazards, assessing the risks to health and safety from violent acts and putting in place appropriate safeguards.

Ref: MAN 19-16-01 Violence and Aggression

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Document Owner: John Brophy
Document Approver: Paul Williamson

6.2 Welfare Facilities

Phoenix Tower International recognises its duties under the Safety, Health and Welfare at Work Act 2005, and associated Regulations, to provide adequate welfare facilities for its employees and to maintain the facilities in a clean and hygienic condition on an ongoing basis. Phoenix Tower International will ensure that all welfare facilities are monitored and cleaned on a daily basis and will provide for the replenishment of stocks of cleaning materials and disposable toilet and hygiene products. It is the responsibility of all employees to leave welfare facilities in a clean and tidy condition and not to abuse or damage any facilities provided for their welfare.

- Separate toilets or separate use of toilets for men and women in compliance with the Safety Health and Welfare at Work (General Application) Regulations 2007 are provided.
- Washing facilities are provided, with hot and cold running water, and with soap and hand drying facilities.
- Hygienic disposal units are provided for female employees.
- All welfare facilities are cleaned on a regular basis.
- Facilities are provided for changing of industrial clothing and securing clothing when not in use.

6.3 Protection of Pregnant, Post Natal and Breastfeeding Employees

Phoenix Tower International will comply with all requirements of the Safety, Health and Welfare at Work (Pregnant Employees) Regulations 1994, the Maternity Protection Act 1994 and the Safety Health and Welfare at Work (General Application) Regulations 2007. The relevant manager is responsible for ensuring that the following procedures are in place and that all relevant employees are fully briefed on the implementation of the procedures.

1. The pregnant employee should inform her manager by way of medical certificate, of her condition as soon as she becomes aware of her pregnancy. This notification will enable the Company to undertake any detailed risk assessment which may be necessary.
2. Upon receipt of the notification the relevant Manager will carry out a risk assessment in line with the Regulations and stipulate any protective controls, which may be necessary.
3. The employee concerned will be afforded any confidentiality requested and will observe fully the requirements of the Regulations.
4. Where control measures require re-assignment or special leave the Company will observe fully the requirements of the Regulations.

Once a risk assessment is completed the relevant line manager will ensure that all necessary controls are fully implemented and monitored.

Reference Documentation

Safety Health and Welfare at Work (General Application) Regulations, 2007, Chapter 2 of Part 6
Maternity Protection (Amendment) Act, 2004

Appendix 1 Regulatory Authorities

The following statutory authorities impact directly on Phoenix Tower International's operations and act to enforce and advise on compliance with safety and environmental legislation.

Health and Safety Authority is the national statutory body with responsibility for ensuring that workers (employed and self-employed) and those affected by work activity are protected from work related injury and ill-health.

Environmental Protection Agency (EPA) is an independent public body established under the Environmental Protection Agency Act, 1992. The Agency is charged with the protection of the environment.

Radiological Protection Institute of Ireland is an independent public body, established in 1992 under the 1991 Radiological Protection Act, which conferred on the RPII a broad remit in relation to radiological protection in Ireland. The RPII polices both ionising and non-ionising radiation exposure.

ComReg the Communications Regulator: carries out an annual programme which measure public exposure levels of non-ionising radiation in telecommunications sites.

Other statutory authorities which impact on Phoenix Tower International business activities are eir, Iarnród Éireann, Electricity Supply Board, National Roads Authority, Coillte, Irish Water and Local Authorities including the Fire Services. Department of the Environment and Climate Change.

Appendix 2 Company Entities

	Entity
1	Emerald Tower Ltd
2	Phoenix Tower International Ltd
3	Phoenix Tower International Holdco Ltd
4	Celtic Infrastructure Irish Tower Ltd
5	Clover Infrastructure Irish Tower Ltd
6	Phoenix Tower International II Ltd
7	Phoenix Tower International III Ltd
8	Phoenix Tower International IV Ltd

Appendix 3: Key Safety Documents and Resources

No.	Policy
1	Safety Statement
2	Health and Safety Policy – Signed off by Phoenix Tower International Board
3	Phoenix Tower International Integrated Management System
	Operational Documents
4	Control of Contractors – Construction Safety Management System
5	Lone working
6	Working on rooftops
7	Non-ionising radiation
8	Using field and step ladders
9	Working in radio base stations – ground level
10	Lightning storms and inclement weather conditions
11	Road Safety Driving
12	Weils Disease and Psittacosis
13	Violence and aggression
14	Contractor operations on Irish Water sites
15	Using Personal Protective Equipment
16	Access to Joint Use Antenna - Streetlight Poles
17	Psychosocial Risk

	Risk Assessments - Ireland
18	Introduction to Risk Assessment
19	Lone working
20	Working on rooftops
21	Working on mountain top sites
22	Working in radio base stations – ground level
23	Using telescopic and step ladders
24	Non-ionising radiation
25	Waveguides
26	Driving on and off road
27	Weils Disease and Psittacosis – lung disease related to pigeon droppings – rooftop and church spires
28	Livestock and dogs
29	Violence and aggression
30	Working in Site Provider Controlled Site Locations – ESB, RTE, Irish Water etc. based on their documentation
31	Lightning storms and inclement weather conditions
32	Visual display equipment
33	Office machines photocopiers etc
34	Fire
35	Manual handling – if required
36	Electricity
37	Detergents and cleaning agents

Appendix 4 Risk Assessment

A 3.1 Task Specific Risk Assessments

Task specific risk assessments have been developed for all common work related tasks and operations. The standard risk assessment identifies the hazard and associated risks and sets out the relevant risk controls and resources in tabular format. Where appropriate, the risk assessments are further developed into detailed documents which set out the risk controls in the form of Safe Systems of Work. These documents are available in electronic format on the company server.

- Online CSafe Manual for operations in Radio Base Stations including rooftop sites

A 3.3 Pregnant Employee – Risk Assessments

Phoenix Tower International undertakes to identify and assess the risks to the health and safety of pregnant / breast feeding employees. It is our policy to comply with all requirements of the Safety, Health and Welfare (General Application) Regulations, 2007 and the Maternity Protection Act, 1994.

A 3.4 Display Screen Equipment/ Work Station Assessments

In compliance with Chapter 5 of Part 2 of the *Safety, Health and Welfare (General Application) Regulations, 2007*, we are committed to providing appropriate equipment and training to Display Screen Equipment Users (defined; as those employees who use a display screen for more than one hour continuous use per day, at work).

An individual analysis of the employees workstation will evaluate the safety and health of employees, with reference to eyesight, physical difficulties and mental stress. All employees are provided with a one-to-one ergonomic assessment of the workstation, which will be carried out by a competent person with the necessary skills, training and experience. Where required, this person will propose recommendations for specific physical or postural adjustments. Immediate steps will be taken to remedy any risks to safety and health identified.

The documented risk assessment for each workstation includes the following:

- Evidence that all aspects detailed in Schedule 4 of the Regulations were taken into account as part of the analysis
- Details of issues which have been identified for resolution
- Details of an action plan to address outstanding issues; which stipulates who is responsible; what actions will be taken and when they will be completed.

Reference Documentation

Phoenix Tower International Workstation Assessments

A 3.5 Building Specific Risk Assessments

It is the policy of the Company to identify hazards in the work place; assess the risk to safety and health and control these risks as far as is reasonably practicable. Phoenix Tower International have developed a risk assessment programme for all manned Phoenix Tower International premises.

Reference Documentation

Building Specific Risk Assessment

A 3.6 Phoenix Tower International Site Locations

All Phoenix Tower International sites are risk assessed. A full residual risk assessment provides comprehensive information on sites relating to access routes and risks such as proximity to power lines. Tower / monopole access methods are also detailed. The site residual risk assessment is made available to interested parties / contractors / site owners as part of the Safety File.

Reference Documentation

Site Residual Risk Assessments

A 3.7 New Plant and Equipment Risk Assessments

A full risk assessment and evaluation of conformity to all relevant standards is carried out on all new safety critical plant and equipment prior to introduction to service. The risk assessment will consider in the first place that the equipment conforms to all relevant standards and will then consider the risk arising from its intended use in the workplace.



24th July 2025