Health Safety and Environment Policy

Relating to:

RAXIO GROUP B.V. AND ITS SUBSIDIARIES
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Introduction, Purpose and Scope:

Raxio is an investment platform developing, building and operating Tier III data centres across Africa. The company is fully registered in Uganda, Mozambique, Ethiopia, Congo, Ivory Coast and operates in Uganda and beyond. The scope of the company includes provision of Co-location data center services to the local, regional, and global ICT & business communities.

Raxio believes that the conditions of health and safety of employees, contractors, clients, local communities, and visitors are a prime business objective and an integral part of our decision-making process. Raxio is committed to ensuring that it has a sound, safe, and healthy environment and practices in place that are supported by each subsidiary’s local law and international best practices while achieving sustainable and profitable growth by providing services which consistently satisfies the needs and expectations of our interested parties. The company recognizes that the above can be achieved sustainably while taking care of the environment in which we operate.

Raxio believes that all workplace accidents and ill health are preventable, therefore the company commits to providing a Safe and Healthy working environment.

To demonstrate this high-level commitment to Safety, Health and Environment, Raxio has established, implemented and maintained an Integrated Management System compliant with ISO14001:2015, ISO45001:2018, and associated in-country legal requirements.

The application of this Policy must be intended in connection to all the other policies implemented by Raxio Group B.V. and its subsidiaries, including, inter alia, Energy Policy, Employee Handbook, Code of Ethics, Health and Safety, etc. and any other policy that will be developed by Raxio over time.

Policy Statements:

Raxio Group and its subsidiaries are committed to comply with (i) those principles set out in the paper entitled “A Financial Industry Benchmark for determining, assessing and managing social, environmental risk in Project Financing” dated July 2020 (as published on www.equator-principles.com), as amended or supplemented from time to time (“Equator Principles”); and (ii) the International Finance Corporation’s Performance Standards on Environmental and Social Sustainability, together with the World Bank Group Environmental Health and Safety (EHS) Guidelines (including without limitation the International Finance Corporation’s 30 April 2007 General Environmental and Health and Safety Guidelines), in each case as in force and relevant to the Works from time to time (“IFC Standards”).

Additionally, Raxio Group and its subsidiaries shall:

- Ensure that a safe and secure working environment is provided for employees, contractors, key stakeholders, and the surrounding communities.
- Arrange for a robust health and safety advice and training of its staff as required
- Ensure that Safety Health and Environmental (HSE) objectives are set and programs to achieve the objectives are established, monitored, and evaluated.
- Minimizing pollution and waste by ensuring that our operations are as efficient as possible.
- Ensure that adequate resources are available for consistent and effective HSE management.
- Comply with all relevant National and International legal, statutory and other requirements.
- Ensure compliance with Raxio Group Policies
- Work towards early identification and elimination of Hazards, reduce Occupational Health and Safety risks throughout the company and prevent adverse impacts on the natural environment.
• Ensure that all employees, contractors, and interested parties are provided with access to all policies, processes, procedures etc.
• Ensure that contractors are advised on their responsibilities concerning health and safety working of Raxio
• Ensure that all contractors are competent to carry out their function and that their ongoing performance is monitored, audited, and reviewed.
• Consult employees and encourage their participation in OSH or HSE related matters at all times.
• Appraise our HSE to ensure continuous improvement through feedback, performance management, Audit, management reviews and change management.
• Identify, control, and where possible strive to eliminate all unsafe acts and conditions.
• Be open, honest, accountable to our stakeholders routinely about our operations and products, soliciting their feedback and encouraging a candid dialogue.
• Cooperate proactively with legislators and regulators to evaluate feasibility, impact, and cost/benefit of proposed laws, regulations and standards.

Responsibility and policy review:

It is the responsibility of all employees to work in a safe manner and not put themselves or others at risk/impact through the way they work. They should thus wear mandatory PPE within recognized working areas of the project at all times. All employees must also support and develop a corporate culture devoted to creating a health, safe and environmentally friendly business environment.

The Implementation of this policy is responsibility of the Management of Raxio Group and, individually, of all employees of Raxio.

All employees and third parties working with Raxio, must promptly report any health, safety, welfare issue, incident and accident that may affect Raxio employees and its stakeholders, either potential or factual, no later than the end of the particular working day during which the incident or accident occurred. To limit the exposure to risks, Raxio’s employees and their guests (including service providers and suppliers) are always required to use and maintain all personal protective and safety equipment as prescribed.

The approval of this policy is responsibility of the Management Board of Raxio. It is a priority of the Management Board of Raxio to identify and process continuous improvements in environmental performance of Raxio through the use of effective environmental management systems.

This policy must be reviewed at least once a year.