

Schedule 32 – Health, Safety, Security and Environmental Policy

1 About this Policy

1.1 It is the aim of Pure Data Centres Group (PDCG) to be an industry leader in Health, Safety, Security and Environment (HSSE) performance. We believe that outstanding HSSE performance is an integral part of efficient and profitable business management. To improve on our HSSE performance we will be guided by the following philosophy:

- a. **Protection of Health, Safety and Security of our People and those affected by our Business.** Our goal is zero injuries. We believe that all injuries to people are preventable. We will strive to create a working environment where accidents will not occur and within which employees, contractors and the public will not be exposed to health hazards. We will assess the exposure of employees and contractors to health, safety and security hazards and will implement programs to raise awareness and reduce hazards. We shall ensure our employees and contractors are trained in workplace health and safety and encouraged to adopt a healthy lifestyle.
- b. **Protection of our Physical Assets and Reputation.** We recognise that HSSE is everyone's responsibility and that we each have a duty to intervene to prevent unsafe condition and actions, and to reinforce good behaviours. We believe Risk Management to be the foundation stone of our HSSE performance. Each worksite is different and only by assessing the risks at each site can effective control measures be put in place. We will periodically assess the risks of our activities, set priorities and develop action plans to reduce risks and minimise HSSE consequences. The safe delivery of projects and operation of facilities is a critical success factor – it is not just the end result that matters, we care about how we get there.
- c. **Protection of the Environment.** We will protect the environment by seeking to minimise the impact of our activities. We will strive for progressive improvement in the environment performance of our facilities by reducing emissions, waste and the use of energy. We will evaluate the opportunities for preventing or minimising pollution and waste and take action. New facilities and plant will apply best available pollution control methods that are commercially viable. Effective plans will be maintained to deal with all foreseeable emergencies.

1.2 We will conduct our business in a responsible manner and go beyond compliance with local regulation to meet internationally accepted good practice in health, safety, security and environmental protection.

2 Policy Rationale

2.1 We believe that outstanding business performance requires outstanding HSSE performance. The safe delivery of projects and operation of facilities is a critical success factor for our business.

3 Applicability

3.1 Every employee, director or officer of every PDCG company and in every joint venture company under PDCG control must follow this Policy. Contract personnel working for PDCG companies must also follow this Policy. Contractors and consultants are required to act

consistently with this Policy when working for PDCG companies as our agent, on our behalf or in our name on any business activity including when delivering outsourced services.

- 3.1.2 We apply this Policy in all joint operations where PDCG is the operator. When participating in joint venture companies not under PDCG control we encourage the adoption of a similar policy requirement.
- 3.1.3 Breach of a Company Policy may result in disciplinary action, up to and including dismissal. Contracted personnel who fail to comply with this Policy may have their contract terminated, not renewed, or be subject to other appropriate action. The Company reserves the right to amend or update this Policy as required from time to time.

4. Policy Implementation

- 4.1 To meet our HSSE Policy and goals, PDCG shall:
 - a. Maintain and communicate Standards and Guidelines, which reflect best industry practice and are consistent with legal and regulatory requirements in all operating areas.
 - b. Establish clear accountabilities and performance expectations for HSSE in the management structure and for all employees in the organisation.
 - c. Ensure that our employees and contractors understand their HSSE accountabilities and are aware of the behaviours expected during performance of duties and service delivery.
 - d. Promote a supportive culture where people are encouraged and feel able to intervene and report on HSSE issues of concern and where continuous improvement is fundamental to the way we work.
 - e. Ensure that the organisation is properly resourced, commensurate with the risks involved to enable effective management of HSSE risks.
 - f. Provide a safe working environment which protects against injury and minimises incidents of work-related ill health.
 - g. Provide appropriate security protection for our employees and contractors against threats which may occur when they are working and travelling on Company business, in line with our duty of care obligations.
 - h. Adopt a risk-based approach to the design, construction and operation of facilities; where necessary develop and implement appropriate plans to ensure that HSSE risks are as Low as Reasonably Practicable (ALARP).
 - i. Maintain Emergency Response, Crisis Management and Business Continuity plans and test these regularly to ensure their effectiveness.
 - j. Operate in accordance with the environmental management standard ISO 14001 in all facilities, which PDCG operates.
 - k. Work to reduce environmental emissions, waste and the use of energy relative to activity.
 - l. Investigate HSSE incidents and act on the results to ensure that key lessons are learnt across the organisation.
 - m. Consult with all interested stakeholders (including governments, employees, partners, customers, contractors, local communities and industry organisations) to understand and take account of their concerns.

- n. Publicly report on appropriate HSSE objectives and performance, fully co-operate with relevant government agencies, and work with the industry to improve HSSE practices and learn from each other's experiences.

5 When Working with the Company

5.1 Employees must:

- a. Understand their HSSE accountabilities as specifically detailed in their job descriptions.
- b. Familiarise themselves with the Company HSSE Policy relevant to their role and with applicable legal and regulatory requirements.
- c. Carry out their duties in accordance with the HSSE standards, policies and regulations applicable to their role, ensuring that they take appropriate care of themselves and others at all times.
- d. Plan work to ensure safe delivery of activities for which they are responsible, stopping the job when unsafe situations arise.
- e. Ensure they wear appropriate Personal Protective Equipment (PPE) where required and report any defects.
- f. Not interfere or tamper with equipment provided to protect HSSE.
- g. Intervene to promote good HSSE behaviours and stop unsafe acts by others, recognising that they should not put themselves at risk in so doing.
- h. Promptly report hazards, hazardous conditions and near misses that they observe could lead to health, safety or security incidents, damage to the environment or damage and loss of company assets.
- i. Promptly report incidents and contribute to investigations when required.
- j. Seek advice and guidance if they are required to carry out activities for which they have not been trained or that are beyond their level of competence.