

LIBERTY LATIN AMERICA

HEALTH & SAFETY (H&S) POLICY

Our guide to creating a safe

H&S POLICY

HEALTH & SAFETY MANUAL



INTRODUCTION

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		2.0

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OVERVIEW

In the performance of all activities inside and outside the company, there are risks that can cause illness, damage and injuries to employees due to unsafe acts and conditions caused by noncompliance and ignorance of the rules and procedures of Health and Safety at Work. For this reason, for Liberty Latin America (LLA), and each of its direct or indirect majority owned subsidiaries it is essential that all its employees are properly oriented on the importance of complying with all safety rules at work.

PURPOSE

The purpose of this manual is to promote a culture of prevention among all LLA personnel in order to provide safe working conditions and raise awareness of the importance of carrying out their duties in compliance with the safety standards and rules established in each work area. In addition, the manual aims to promote our safety philosophy and our commitment to the well-being of all our employees, as well as to present our proactive attitude in addressing this important issue.

This manual also aims to promote preventive measures not only at the use of protective elements, but also at promoting safe practices to avoid occupational risks and dangerous conditions at work in order to reduce accidents and occupational diseases that compromise the health and life of employees.

This manual aims to establish the standards, rules and procedures, as well as guiding and educating all company personnel to avoid unwanted events and maintain efficient and productive operations.

Our commitment to you is to provide you with a safe work environment, where you can perform your tasks and functions effectively and efficiently. To avoid or minimize the occurrence of any risk factor that may cause an incident, accident or adverse event to your health and well-being.

SCOPE

This manual is part of the workplace safety program and is framed in accordance with any applicable legal or regulatory requirement, to each employee of Liberty Latin America and each of its direct or indirect majority owned subsidiaries, wherever they may be located. Any of these companies may be referred to herein as the "Company". Individual LLA OpCos may have additional requirements, but these must not conflict with the requirements laid out in this Framework.



POLICY FOR HEALTH AND SAFETY

H&S policy is a statement of intentions and principles of action and expresses the vision of the organization in H&S matters. It is based on the company's Statement of General Business Principles and the Policy Guidelines on Health and Safety.

LLA HEALTH AND SAFETY

Liberty Latin America (LLA), is dedicated to the development, design, implementation and operation of telecommunications networks, we recognize health and safety (H&S) management as an integral part of its business performance and is committed to ensuring – so far as is reasonably practicable – the health, safety and welfare of our employees, contractors, customers, stakeholders, and the communities in which we live and work. That is why our commitment is to fully comply with all laws and regulations related to health, safety, and the environment within each market we operate.

We require active commitment to and accountability for H&S policies and standards from all employees, suppliers and contractors. Whilst overall governance for H&S management remains at the LLA board level, each market leader is responsible for establishing, implementing, maintaining and ensuring performance of the H&S management system in his/her respective country. Line management has a leadership role in communicating, implementing and ensuring compliance with H&S policies and standards.

We are committed to – so far as is reasonably practicable:

- a) Providing and maintaining safe and environmentally sustainable:
- b) Ensuring that H&S risk assessments are conducted when new methods, processes, equipment, or premises are considered or planned to ensure that:
- c) Ensuring consultation with employees on H&S matters and encouraging their active involvement with, and commitment to, the Company's effort to raise and maintain the H&S standards in its business activities.
- d) Providing adequate H&S information, instruction, and training – on induction courses – for managers, supervisors, and employees to enable them to fulfil their responsibilities, including their right to stop unsafe work.
- e) Providing adequate training and control of suppliers, contractors and visitors by giving appropriate advice regarding H&S matters and any necessary precautions – such as use of Method Statements and Permit to Work – to be followed whilst working on, or at a site.
- f) Ensuring that all emergency matters – fire precautions, firefighting, emergency evacuation, first aid equipment and supplies – are adequate to meet the needs of the staff and properties are sufficiently maintained.
- g) Providing leadership, the necessary resources and safe conditions to promote a preventative culture of accidents and occupational diseases amongst our staff, contractors and environmental protection through the reinforcement of healthy, safe, and environmentally responsible attitudes and behaviours.
- h) Ensuring all near misses, incidents, or accidents are reported and recorded – where necessary to the appropriate enforcing agency – fully investigated and all steps necessary, as far as is reasonably practicable, are taken to prevent a recurrence.
- i) Introducing programmes which aim to minimize – material and energy waste, their safe and reasonable disposal, and use continuous improvements in managing our environmental impact.
- j) Continually improve all aspects of company policy, objective, goals, risk assessments, procedures, guidance, and training, as part of our commitment to ensure compliance with all H&S legislation. This will be reviewed at least annually and when a significant change occurs in legislation or within the organization.
- k) Conducting regular audits and inspections to verify compliance with LLA policy, relevant regulatory requirements, international agreements, and company standards.



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H&S KEY PRINCIPLE



MAIN COMPONENTS OF OUR H&S MANAGEMENT SYSTEM

Our H&S management principles start at the very top of the organization level and from there, visible management commitment throughout the organization. The key elements are as follows:



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H&S LIFE SAVING RULES



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OVERVIEW

GENERAL REQUIREMENTS

The following general requirements apply to all eleven Life Saving Rules and multiple Life Saving rules may apply to an activity or work task.

1. Critical Controls are identified for each Life Saving Rule and are the minimum requirements. These controls help in the prevention of events that we can't recover from or allow us to fail safely.
2. Prior to each Life Saving Rule activity a risk assessment must be performed. The scope of the risk assessment must be appropriate for the task.
3. Prior to and during each Life Saving Rule activity a system must be in place to:
 - 3.1. Identify hazards
 - 3.2. Provide mitigation for those identified hazards
 - 3.3. Ensure the ongoing effectiveness of mitigations
 - 3.4. For control of work activities, ensure that acceptable work conditions are communicated to affected personnel.
4. For any changes in work scope and/or conditions:
 - 4.1. Stop the work
 - 4.2. Reassess the hazards
 - 4.3. Verify effectiveness of existing and/or any new safeguards prior to recommencing work.
5. Prior to any Life Saving Rule activity, confirm that all workers are trained and/or competent for the task they are to perform.
6. Prior to any Life Saving Rule activity, confirm that all workers are fit for duty.
7. Each Business Unit must have in place a Life Saving Rules Verification process that addresses the Critical Controls and all Minimum Requirements.

RULE
#1

Personal Responsibilities

01

Conduct oneself in a manner to protect oneself and others.

02

Comply with safety instructions and procedures.

03

Ensure you are appropriately trained to perform assigned tasks and participate in the safety training offered.

04

Use all personal protective gears and safety equipment properly and do not tamper with it.

05

Report any situation which you believe could be a hazard.

06

Report any work-related accident or ill health.

For further guidance, see local HSE Management System requirements. Or contact HSE@lla.com

RULE
#2

Working Onsite

- 01 You are **responsible** for your own and others safety.
- 02 Wear the necessary **Personal Protective Equipment (PPE)** for the job.
- 03 Use the **right tools and equipment** and use them in the right way.
- 04 **Lift properly** using your legs and not your back.
- 05 Maintain a **clean and orderly work area**.
- 06 Report any **unsafe conditions** or injuries
- 07 **Alcoholic beverages and drugs** are **prohibited** during working hours.

For further guidance, see local HSE Management System requirements. Or contact HSE@lla.com

RULE
#3

Personal Protective Equipment (PPE)

- 01 Safety helmet
- 02 Glasses / eye protection
- 03 Gloves (linesman and rubber insulated gloves)
- 04 Traffic / hi-visibility vests
- 05 Line-man's belt complete with pole strap
- 06 Full body harness and lanyard
- 07 Safety boots / shoes
- 08 Voltage tester

For further guidance, see local HSE Management System requirements. Or contact HSE@lla.com

RULE
#4

Emergency Response

- 01 Stay calm. Protect yourself and property.
- 02 Assess the situation. Determine what happened, what the emergency is, and how to control.
- 03 Take command. Call for help/emergency services and safeguard the area.
- 04 Provide protection voluntarily. Protect victims, equipment, materials, environment, and accident scene from continuing damage or further hazards.
- 05 Provide first aid voluntarily (if you are trained) or help those already doing so.
- 06 Maintain contacts. Alert your manager/supervisor and keep them informed.
- 07 Guide emergency services. Lead them to emergency scene.

For further guidance, see local HSE Management System requirements. Or contact HSE@lla.com

RULE
#5

Road Safety and Driving

- 01 Be aware of your surroundings.
- 02 Full PPE must be worn.
- 03 Cordon off areas with high pedestrian traffic.
- 04 Use caution when working near live traffic.
- 05 Use proper traffic control devices and measures (e.g. cones).
- 06 Ensure you are licensed and authorized to drive the vehicle.
- 07 Pre-operational checks of equipment must be completed.
- 08 Report any problems or faults immediately (company vehicles).
- 09 Do not use your phone while driving and use seatbelts while operating a vehicle.

For further guidance, see local HSE Management System requirements. Or contact HSE@lla.com

RULE
#6

Electrical

01

It is important that non-conductive tools are used around all 'live' electrical equipment.

02

Visually inspect work site before beginning the work to identify power lines.

03

Report any defective equipment or electrical problem immediately.

04

Do not complete the job until the issue has been corrected.

05

Work on utility poles should NEVER be conducted when it's raining or when poles are wet.

06

Use voltage detector to determine presence of hazardous voltage without contacting the electric source.

For further guidance, see local HSE Management System requirements. Or contact HSE@lla.com

RULE
#7

Ladders

- 01 Read and follow all the manufacturer's instructions and labels on the ladder.
- 02 Remember to inspect your ladders before each use.
- 03 Pay attention to power line distance, identify if there is a high risk of contact and take appropriate action, and always use your electrical safety hardhat and electrical gloves.
- 04 Place ladder on a stable and level surface.
- 05 Use the '1 in 4 Rule' (e.g. set the ladder out one foot for every four feet up)
- 06 Extend the top of the ladder three feet above the landing.
- 07 Maintain a three-point contact (two hands and one foot, or two feet and one hand) while ascending and descending the ladder.
- 08 Don't hold items while climbing (where possible), instead use utility belts or other methods to keep your hands free.
- 09 Only use non-conductive ladders like fiberglass.

For further guidance, see local HSE Management System requirements. Or contact HSE@lla.com

RULE
#8

Hoisting Operations

01

When cranes / hydraulic lifts are required, ensure they are certified. Only trained persons are allowed to operate this equipment.

02

Pre-operational checks of equipment must be completed.

03

Visually inspect work site before using equipment or vehicles.

04

A minimum of two (2) employees must carry out the operation (the equipment operator and the assistant or helper).

05

Wear high visibility clothing when working near moving equipment or vehicles.

06

Keep a safe distance when working near overhead power lines.

For further guidance, see local HSE Management System requirements. Or contact HSE@lla.com

RULE
#9

Confined Space

- 01 Only trained, authorized personnel can perform the task, not only in operating within such, but in rescue procedures.
- 02 Generate the necessary Confined Space Entry Permits as required.
- 03 Personnel must have appropriate equipment to enter confined spaces.
- 04 Ensure that air is tested for hazardous atmospheres prior to entry and monitored routinely before and during entry.
- 05 Station an attendant trained in rescue and CPR outside confined space at all times before and during confined space entry.

For further guidance, see local HSE Management System requirements. Or contact HSE@lla.com

RULE
#10

Lifting and Material Handling

- 01 Make your environment safe, ensure a clear walk path.
- 02 Stand close to the load.
- 03 Get a proper grip of the load, use the palms of the hands and roots of your fingers.
- 04 Lift with your knees avoid bending over, use a slight bend of the knees, hips, and back.
- 05 Keep a good posture, look straight ahead, and keep your back straight, your chest out, and your shoulders back.
- 06 Get help when you need it, but make sure all parties know how to lift safely.
- 07 If available, use the right tools/equipment designed for lifting loads.

For further guidance, see local HSE Management System requirements. Or contact HSE@lla.com

RULE
#11

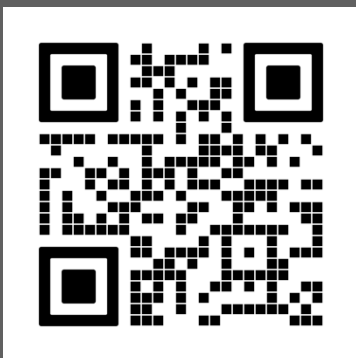
Tools and Equipment

- 01 Read and follow all the manufacturer's instructions and labels for that specific tool/equipment.
- 02 Ensure you are properly protected with all necessary PPE: safety glasses, hard hat, and potentially ear protection.
- 03 Report any problems or faults immediately.
- 04 Do not use portable hand power tools with damaged cords or faulty mechanism.
- 05 Ensure the voltage detector is working properly.

For further guidance, see local HSE Management System requirements. Or contact HSE@lla.com

Report Accidents and Unsafe Conditions

It is vital that all employees report any accidents or incidents or near misses immediately to your manager/supervisor and complete the required forms within 24 hours.



Scan the QR code to
report an accident / incident



HEALTH
& SAFETY

THINK SAFE
WORK SAFE
BE SAFE

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H&S

EXTERNAL

WORKFORCE



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INTRODUCTION

“Contractor” shall also mean “Vendor or Supplier” as the context requires.

HSE COMMITMENT

We are committed to creating a safe work environment and maintaining the highest environmental standards in the performance of our operations. We consider HSE performance to be a cornerstone of this business. Meeting the commitment to HSE excellence is a responsibility shared by everyone working with LLA and its subsidiaries, including Contractor and Subcontractors.

Contractor maintains primary responsibility for the safety of personnel and members of Contractor Group while performing Work.

GENERAL APPLICATION

Contractor shall ensure that all requirements of this policy are communicated to and complied with by all workers and/or members of Contractor Group. Unless expressly stated below, compliance with the requirements shall be solely at Contractor’s expense and at no cost to LLA.

ADDITIONAL DEFINITIONS

“**Contractor**” - An individual or organization performing work for the Company, following an executed agreement.

“**Contractor Group Personnel**” shall mean all individuals employed by or under contract with Contractor or a member of Contractor Group who are engaged in the performance of the Work.

“LLA” – means Liberty Latin America group, including all of its subsidiary companies.

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KEY EXPECTATIONS FOR CONTRACTOR GROUP PERSONNEL

Recognizing that Contractors play a vital role in Company's ability to be an industry leader in H&S performance, Company strives for continuous improvement in its H&S program and has established "key expectations" for all personnel working on Sites (including personnel of the members of Company Group), set out below.

All personnel working at a Site shall comply with the following, as identified as applicable or made applicable by Applicable Laws:

	Contractor shall ensure that all Contractor Group Personnel engaged in the Work at a Site can safely perform the essential functions of their job assignment.
1	Participate in on-site safety programs, meetings, inspections, etc., as applicable.
2	Correct hazardous situations immediately if it is within the individual's capability to do so and can be done safely; otherwise, stop the job and notify the senior representatives of Contractor and Company.
3	In the event of an Incident, notify a Company representative/ supervisor immediately.
4	Use appropriate PPE to conduct Work safely.
5	Be familiar with Site-specific emergency procedures and follow those procedures during an emergency.
6	Maintain good housekeeping practices, including proper storage, handling, and disposal of all Wastes.
7	Comply with all applicable health and safety programs and practices.
8	Practice job safety planning in order to work without risking injury to oneself or others.
9	Ask for clarification or help before conducting any task if the work procedures, work layout or job requirements are not known or are unclear; and
10	Be familiar with the LLA's H&S Critical Activities Protocols as they apply to the Work.
11	Contractor shall ensure that all Contractor Group Personnel at a Site are instructed and empowered to report all potential hazards, unsafe conditions, unsafe acts, and near misses to the appropriate supervisor or person in charge

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GENERAL H&S REQUIREMENTS

These principles are supplementary to any H&S Site-specific requirements.

1	Contractor shall have a documented corporate H&S policy. Contractor shall document the name, title, and experience of the most senior person in the organization responsible for ensuring that this policy is observed. Contractor shall also document who has overall and ultimate responsibility for H&S matters within its organization.
2	Contractor is expected to have independent knowledge and expertise to manage the health, safety, and environmental aspects required to perform the Work. Nothing contained in this Manual is intended to affect, or shall be construed as affecting, the independence of Contractor or Contractor's responsibility for all health, safety, and environmental aspects of performing the Work.
3	Contractor shall obtain for itself a full understanding of the Work to be performed, including operations that may pose a hazard to persons, property, or the environment. Contractor shall, using its own experience and knowledge, ascertain that the Site is safe for the proposed Work before commencing Work.
4	Contractor shall maintain its own documented H&S MS, as further described in Section 1: H&S KEY PRINCIPLES herein. Contractor's H&S MS will apply to the Work and, at a minimum, meet or exceed Company's requirements. The company may review any aspect of Contractor's H&S MS and may provide suggestions for improvement and areas of focus to achieve a zero Incident culture at Company's Sites.
5	Contractor shall ensure that all Contractor Group Personnel are aware of, trained on, and competent in all aspects of Contractor's H&S MS, LLA's H&S Life Saving Rules, and Company's H&S MS as it relates to the Work performed on behalf of for Company.
6	Contractor shall undertake reasonable steps to ensure all Contractor Group Personnel are made aware of and comply with the governing procedures and programs established.
7	Contractor shall have a comprehensive assurance system to ensure that equipment and tools are designed, constructed, monitored, maintained, and operated in accordance with applicable industry standards and regulations.
8	All Contractor Group Personnel performing Work shall complete an H&S orientation delivered by Company prior to entering a Site, regardless of their prior experience with that Site or generally. Such H&S orientation will include, but is not limited to, the following items: H&S expectations, policies, procedures, systems, alarms, and any Site-specific hazards.
9	For any inexperienced Contractor Group Personnel performing Work (defined as those with less than one (1) year experience in a similar role, working in similar conditions), Contractor shall have a documented program to manage the health and safety of inexperienced workers. Contractor shall ensure such individuals are adequately supervised by a member of Contractor Group Personnel who is experienced in and qualified to perform the Work.

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10	<p>If relevant to the Work or identified as required by Company, Contractor Group Personnel may be required by Company to complete training in relevant topics prior to arriving at a Site, including but not limited to: Fall Protection, Confined Space Entry (including a practical component), Aerial Work Platform, Standard First Aid, etc. Unless otherwise expressly agreed by the Parties and documented in writing, such training shall be conducted at Contractor's sole expense.</p>
11	<p>Contractor shall establish a Stop-work process to ensure that all Contractor Group Personnel are aware they have not only the authority, but also the obligation, to stop Work if an unsafe act is taking place or an unsafe condition exists. Contractor shall provide a preliminary Incident report to Company within twenty-four (24) hours of the occurrence of a Work stoppage and a full report in an agreed time between the Contractor and Company</p>
12	<p>When requested to do so by Company, prior to the commencement of Work, Contractor shall provide Company a risk-assessed JHA with adequate controls and mitigations to ensure the safe and execution of the Work. In addition, Contractor must demonstrate that the JHA is regularly reviewed and updated as modifications to the design, procedures, or H&S MS occur.</p>
13	<p>Contractor shall provide its emergency response plan to all Contractor Group Personnel to ensure familiarity with the appropriate emergency response procedures.</p>
14	<p>Conduct job-specific H&S meetings and conduct "toolbox" meetings at individual work locations before commencement of daily activities; meetings should include but is not limited to addressing critical or particularly hazardous Work prior to commencement of such Work, with the fact and content of such meetings being documented, and with copies of such documentation being available to the Company Site Representative upon request</p>
15	<p>When requested to do so by Company, Contractor shall submit H&S policies and procedures for Company's review.</p>
16	<p>Contractor shall conduct regular H&S inspections and reviews of the Work and, insofar as they are related to the Work, of its premises and equipment, and shall submit documentation of the inspections and reviews to Company's H&S Representative upon request. Company may request Contractor to self-inspect and review its Work or premises as described above at any time during the performance of the Work. If requested, Contractor shall complete such requested inspections within two (2) working days.</p>
17	<p>Company reserves the right, at any time, to independently conduct, via Company personnel or through an internal or third party auditor, H&S inspections and audits of a Site, of equipment used or to be used in the performance of the Work, and of Contractor's H&S MS to verify compliance with Applicable Laws and the Agreement (including this Manual). Contractor shall fully cooperate with Company or Company's third-party auditor with respect to such H&S inspections and audits.</p>
18	<p>Contractor has the right to have a representative be present during any such inspection or audit. Findings may be discussed with Contractor and a resulting report may be made available after it is complete. Within five (5) days of the receipt of a written report (or sooner under urgent circumstances), Contractor shall either submit a written dispute of any finding or shall submit written notice of its intent to implement corrective action in respect of findings in a timely manner and at no cost to Company.</p>

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19	In the event of an Incident, a Company supervisor-level representative and Company H&S Representative shall be notified immediately, and Contractor shall take the necessary steps to rectify the situation.
20	Contractor shall have an Incident reporting system that is compatible with all Applicable Laws. All Incidents, Work-related injuries, near misses, occupational illnesses, environmental spills, damage to equipment, security threats, fires, explosions, toxic releases and spills, as well as any Governmental Authorities' notices of violations, warnings or compliance inspections, arising out of performance of the Work, shall immediately be reported to Company. Written preliminary incident report to Company is required within twenty-four (24) hours of the occurrence of an Incident.
21	Contractor shall proactively monitor the adherence of all Contractor Group Personnel engaged in the performance of Work with the Life Saving Rules. Should either of Company or Contractor observe a Life Saving Rule being violated, the observing Party shall determine if the non-compliance could lead to an Incident and shall immediately stop Work until compliance with the Life Saving Rule is achieved. The observing Party shall provide a written report to the other Party's H&S Representative within one (1) working day.
22	Contractor shall provide, at no additional cost to Company, Contractor Group Personnel with all safety equipment and PPE as defined by legislation or indicated specifically as Contractor's responsibility in an applicable contracts, Live Saving Rules and this manual.
23	Contractor shall ensure that all PPE provided is appropriate for the nature of the risks and health hazards (including noise) to which the Contractor Group Personnel may be exposed. Contractor shall provide Contractor Group Personnel with appropriate training and certifications for the use and care of all PPE and shall maintain the PPE in good condition.
24	Contractor shall be responsible for the medical welfare of Contractor Group Personnel and shall make arrangements for medical treatment, insurance, and transport suitable for the Work and the geographical area of the Site.
25	Company reserves the right to require Contractor to remove any Contractor Group Personnel if in Company's sole opinion any Contractor Group Personnel is performing unsafe work practices; is not complying with Applicable Laws, good industry practice, or the terms of the Agreement (including this Manual); or is not competent to perform the Work in a safe and diligent manner. Notwithstanding the foregoing, Contractor shall retain all authority and control over Contractor Group Personnel.