**PRIVATE CAPITAL BELGIUM ESG TEMPLATE**

**DISCLAIMER:**

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**INSTRUCTION MANUAL**

* **There is a set of ESG templates for portfolio companies in a private equity context and a venture capital context. This set covers these for private equity portfolio companies.**
* **Each template covers a specific ESG topic indicated in the title of the template. The full set of templates includes the following documents:**
  + **Employee Code of Conduct**
  + **Suppliers Code of Conduct**
  + **Anti-corruption & anti-bribery policy**
  + **Anti-discrimination policy**
  + **Whistleblowing policy**
  + **Privacy policy**
  + **Health & safety policy**
  + **Environmental policy**
* **Fields marked in yellow are cross-references to templates with other topics in the BVA ESG template set.**
* **Fields marked in green require policy discretion from the portfolio company.**

**Health & Safety Policy**

[*Portfolio company*] (the **Company**) is committed to creating a secure workplace for its staff.

**All places where the Company’s staff is working must be secure and safe.**

All guidelines to ensure an effective implementation of the Company’s commitment regarding health and safety within the workplace are incorporated in this Health and Safety Policy (this **Policy**).

The Company’s executive management is responsible for the effective implementation of the guidelines.

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| --- | --- |
| To which aspects of the Company’s business and for which persons within the Company is this Policy intended? | See section 1 (Scope). |
| **Guideline 1**: ensure compliance with laws, regulations and standards | See section 2 |
| **Guideline 2**: ensure preparedness of staff with emergency situations | See section 3 |
| **Guideline 3**: regularly identify and assess hazard and risks allowing for proactive measures to minimise or eliminate workplace hazards | See section 4 |
| **Guideline 4**: implement on-going internal control measures | See section 5 |
| **Guideline 5**: provide sufficient training and resources to as to cultivate a safety culture | See section 6 |
| **Guideline 6**: ensure that incidents are reported and corrective actions are taken | See section 7 |
| **Guideline 7**: ensure regular monitoring, review and testing | See section 8 |

This Policy has multiple targets:

* compliance with health and safety laws, regulations, and standards;
* proactive implementation of measures that minimise or eliminate workplace hazards;
* cultivation of a safety culture;
* organisation of health and safety training initiatives;
* implementation of a robust incident investigation and analysis process.

1. **Scope**

This Policy applies to all employees, contractors, visitors, and stakeholders who interact with the Company’s operations and premises and covers all aspects of health and safety within the workplace and any activities under the Company’s control.

1. **Compliance with laws, regulations and standards**

The Company is dedicated to full compliance with all applicable health and safety laws, regulations, and industry standards.

All staff members are expected to adhere to applicable laws and regulations in the area of health and safety, whether expressly notified by the Company or not.

1. **Emergency preparedness**

Executive management shall ensure that procedures to identify the potential for and the response to accidents and emergency situations are established and maintained, including mitigation of associated environmental impacts.

Where necessary, the emergency preparedness and response procedures are reviewed and revised by executive management, in particular, after the occurrence of accidents or emergency situations. The organisation shall periodically test such procedures where possible.

1. **Identification and assessment of hazards and risks**

Executive management must ensure that a thorough and ongoing process is in place of identifying workplace hazards and assessing associated risks and control measures. This includes regular evaluations of operations and premises to proactively address potential safety concerns.

On the date of this Policy, the Company has identified the following hazards and risks:

|  |  |  |
| --- | --- | --- |
| **Hazard** | **Risk** | **Control measures** |
| [*Please describe any hazards that may arise in the workplace*.] | [*Please describe the risk presented by this hazard.*] | [*Please describe the measures implemented by the Company to mitigate this risk.*] |

1. **Implementation of control measures**

The Company’s dedication to maintaining a safe working environment goes beyond mere identification of hazards; it extends to the implementation of tailored control measures. The Company employs a combination of engineering controls and administrative measures to minimise or, when possible, eliminate identified risks.

The Company’s executive management can decide to take the following measures to control the identified risks:

* Engineering controls: physical modifications to the workplace, such as ventilation systems or noise reduction barriers.
* Administrative controls: implementation of policies, procedures, and work practices to minimise exposure to hazards. This may include job rotation, scheduling breaks, or limiting the time spent in high-risk areas.
* Training and education: regular training sessions to educate employees about potential hazards, safe work practices, and emergency procedures.
* Emergency response plans: development and practicing of emergency response plans to ensure that employees know how to respond effectively in case of accidents, fires, or other emergencies.
* Ergonomic design: design of workspaces and tasks to minimise ergonomic risks, preventing musculoskeletal disorders and injuries.

1. **Provision of training and resources**

The Company believes that knowledge is the key to maintaining a safe workplace. Therefore, executive management will provide training and resources to ensure that all staff members are well-versed in safety procedures and practices, empowering them to contribute actively to the health and safety commitment.

1. **Incident reporting, investigation, and corrective actions**

All staff members are encouraged to promptly report any incidents, near misses, or unsafe conditions to their supervisor, human resources, or through the procedure set out in [the Whistleblowing Policy].

The Company will investigate any reports by means of a thorough examination of the root causes.

In the event of an incident, the Company’s executive management shall ensure that corrective actions are promptly identified and implemented to prevent recurrence. Such corrective actions may range from revising existing procedures and providing additional training to enhancing engineering controls or modifying work processes. The Company’s goal is to learn from incidents and to continuously improve its safety protocols.

1. **Regular monitoring and review**

The Company is expected to engage in regular monitoring and review of its health and safety performance to assess the effectiveness of its measures. This includes periodic evaluations, audits, and feedback mechanisms to adapt and enhance our practices as needed.

1. **Approval, amendments and entry into force**

This Policy has been issued and approved by [the Board of Directors] who is responsible for the adequacy and appropriate overall implementation of the Policy.

Additions, revisions, amendments and abolishment of this Policy are to be approved by [the Board of Directors]. This Policy will enter into force upon its adoption by [the Board of Directors].