

Health Safety, Environmental & Quality Management System

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1.0	09-08-2024	First publication
2.0	27-09-2024	Addition to considerations and exclusions, link to design management change

Introduction

General

The aim of this document is to highlight the systems and processes necessary to maintain and continually improve Health Safety, Quality & Environment (HSQE) performance, including HSQE efficiency. The aim of the system is to support HSQE performance improvement at all levels of the organisation.

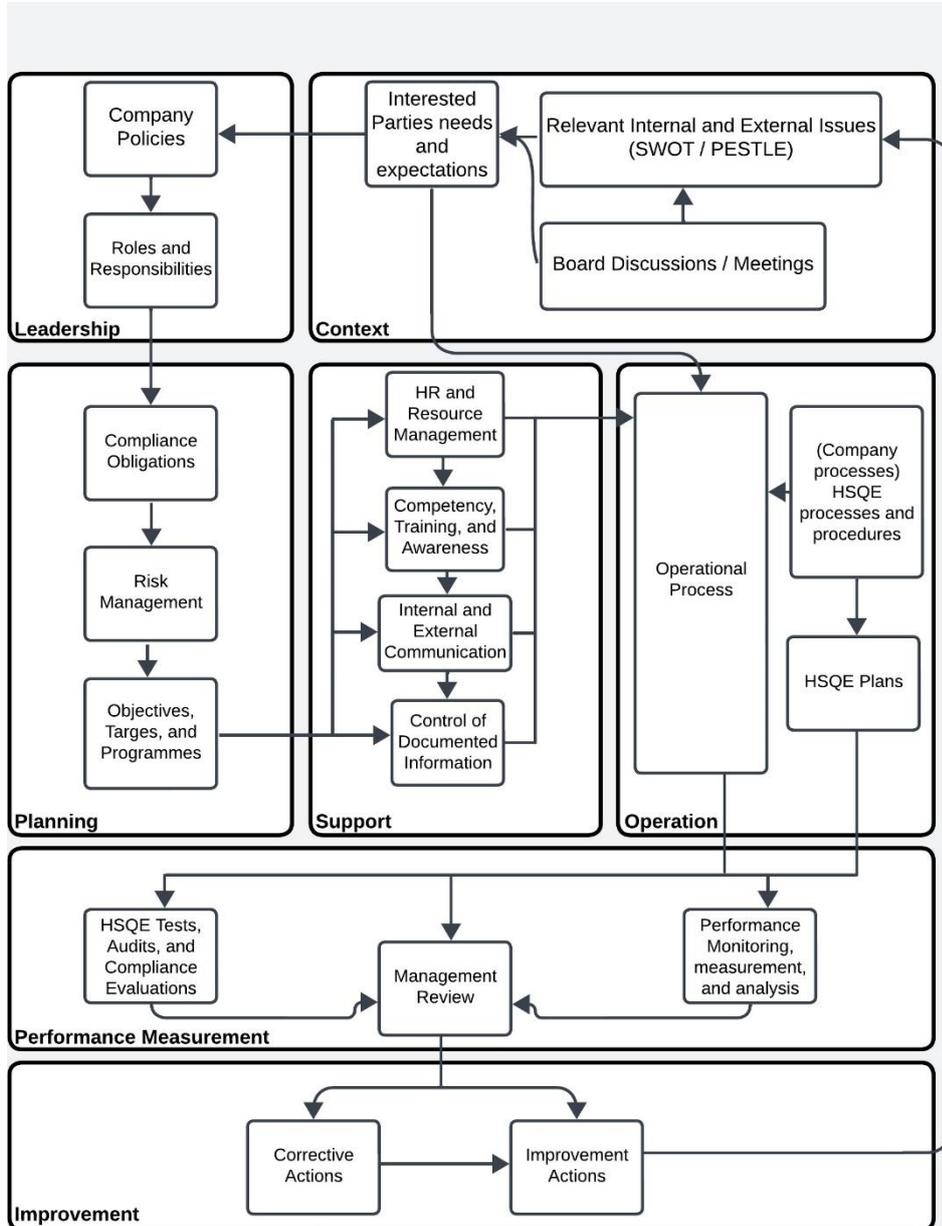
The implementation of this management system (MS from here on) includes the Health & Safety policy, Quality Policy & Sustainability & Environmental Policy, objectives, and action plans while meeting applicable legal requirements and other requirements. This MS enables Yondr to set and achieve objectives and targets, to take actions as needed to improve its systems, and to demonstrate the conformity of its system to the requirements of the ISO 45001, 14001 & 9001 standards.

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The following diagram shows the process flow of the HSQE management system.



Document: HSQE Management System
 Version: v2.0
 Effective Date: 20240927

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General	2
Interested Parties	6
Determining the scope of the management system	6
Considerations	6
Exclusions to the system	7
Yondr Values	8
HSQE Principles	9
Policies	9
Organisational Roles, Responsibilities, and Authorities	10
Central HSQE & Top Management Team	10
Decentral HSQE management	12
Actions to address risks and opportunities	14
Environmental Aspects & Impacts	14
Compliance Obligations	14
Objectives and Targets	15
Change Management	15
Quality Assurance and Commissioning	16
HSE Global D&C Expectations	16
Yondr HSE Global Ops Performance Standards	17
Mobilization Plan	17
Resources	19
Competence	20
Awareness & Training	20
Communication	20
Documented information	21
Control of documented information	26
Operational planning and control	27
Yondr Ops HSE Framework Plan	27
Maintain and Operate Model	28
Emergency Preparedness and Response	28
Design	29
Design & development of products and services	29

Document: HSQE Management System
Version: v2.0
Effective Date 20240927

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Requirements of products and services	29
Control of externally provided processes, products and services	29
Release of products and services	30
Control of non-conforming outputs	30
Procurement	30
Monitoring, measurement, analysis, and evaluation of HSQE performance and the MS	31
ESG – Environmental, Social and Governance	32
Internal Reviews	32
HSQE reviews	32
Management review	33
Outputs of the management review	33
Nonconformity and corrective action	34
Continual improvement	34
Learning teams	34
Rapid Insights	34
Acronym & Glossary	36

Document: HSQE Management System
Version: v2.0
Effective Date 20240927

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Context of the organisation

Interested Parties

The interested parties that are relevant to HSQE performance and the MS are determined, as are the relevant requirements of these parties and if and the way in which they will be addressed through this MS.

The following link below identifies stakeholders across the business rather than HSQE specific. This document linked below is reviewed twice a year with the relevant HSQE Management team.

[Interested parties](#)
[PESTLE](#)

Both internal and external issues that are in relation to the HSQE Management System are regularly reviewed and updated and can be found within the management reviews for ELT/SLT reporting.

Determining the scope of the management system

This document is the main document for the Yondr ISO 45001, 14001 & 9001 HSQE management system. The Yondr MS is set up as a digital system and stored on the Yondr SharePoint.

The purpose of the Management System is to establish a governance structure which will enable Yondr to continually improve performance. Yondr will also aim to continually improve the Management System itself.

The scope of the HSQE Management System covers the Development, Design, project management and development of scalable technology real estate. Research and development for implementation into scalable technology real estate. Asset management including operational and maintenance support to scalable technology real estate.

[Link to Entity overview](#)

Considerations

- / Future data centres shall be managed based on the HSQE Management system.
- / Future data centres shall be managed based on the global Yondr Operations Framework of processes and procedures.
- / Not all entities have the full management system scope. I.e operational datacentres follow the scope "Asset management including operational and maintenance support to scalable technology real estate."
- / Organisation structure for future sites shall be based on identical models – however local laws and regulations shall be considered and implemented.
- / Technical structure for future sites will be based on identical models.

Document: HSQE Management System
Version: v2.0
Effective Date 20240927

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Exclusions to the system

- / Joint ventures where Yondr are not the primary authority for decision making onsite are not included in this system.
- / Yondr Operations UK limited are not included in this system.

Document: HSQE Management System
Version: v2.0
Effective Date 20240927

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Leadership

Yondr Values

Yondr values are at the heart of everything we do. They guide how we approach our work, how we act each day to create a strong, differentiated brand, and how we behave towards clients and our fellow Yondr-ites.

Value:	Traits:	Do:	Don't:
Focused Explorer	<ul style="list-style-type: none"> / Drive efficiency in projects and processes / Conserve time and resources / Simplify complexity / Make decisions quickly and confidently 	<ul style="list-style-type: none"> / Hit deadlines / Say no to things you can't do / Turn up to meetings on time / Follow company processes 	<ul style="list-style-type: none"> / Waste time / Complicate matters / Attend pointless meetings
Everyday Inventor	<ul style="list-style-type: none"> / Challenge convention / Spread great ideas / Make things happen / Champion the big picture 	<ul style="list-style-type: none"> / Communicate own ideas / Listen to other people's ideas / Escalate good ideas / Make ideas scalable 	<ul style="list-style-type: none"> / Say 'we've always done it this way' / Belittle bad ideas
Quiet Hero	<ul style="list-style-type: none"> / Listen more / Learn from and teach others / Do what's right for all / Offer your time and skills 	<ul style="list-style-type: none"> / Listen to understand, not to respond / Share your experiences to help others / Be humble / Lift up others 	<ul style="list-style-type: none"> / Bulldoze over others' opinions or ideas / Be arrogant, ego-centric, glory-seeking or selfish / Disregard health and safety / Ignore issues
Candid Friend	<ul style="list-style-type: none"> / Show everyone the same level of respect / Admit wrong doing and /or ignorance / Have the difficult conversations / Support others' successes 	<ul style="list-style-type: none"> / Respectful candour / Say 'I don't know' / Admit mistakes / Help each other 	<ul style="list-style-type: none"> / Bullshit / Do politics / Avoid tough conversations

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 Version: v2.0
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HSQE Principles

At Yondr we believe that health, safety, environmental (HSE) excellence is our goal not only because it is the right thing to do, but it creates strategic value for the organization. To that end, we want to embed an approach to HSE excellence that brings out the best in people, fosters resilience in our operations, and that creates the conditions for human flourishing for our stakeholders.

The following are our guiding principles we will use to create this HSE excellence. We strive to embed these ideas in everything we do. They inform our decision making and guide us in those moments where the path forward is not clear.

HSE performance is defined by its presence.

Typically, HSE performance is defined, and therefore measured by the absence of negatives (number of accidents, illnesses, spills, errors, etc.). However, this leads to reactivity and confusion about what actually leads to successes and failures in our operations. We can't define HSE by what does or does not happen. We have to define HSE by the presence of those things we are doing to enable the creation of human thriving for our stakeholders.

We improve HSE performance by improving work.

The normal approach to HSE is to focus on these as issues separate from the work, as if these are issues that must be dealt with to allow people to do the real work. But the only place where HSE sits separate from how people do work in our organization is on our org chart. Where the work happens people must find a way to effectively perform while balancing these goals and other goals (e.g., productivity, efficiency, quality, and personal goals) at the same time with constrained resources. We achieve HSE excellence by helping people manage this complexity reliably.

People are the solution.

Typically, in HSE people are seen as the problem to be managed by adding more controls or constraints to their work, or by trying to eliminate them altogether through technology, because the variability of people is inherently hazardous. However, this approach ignores the fact that we rely on that same variability to manage the complexity of work, to avoid failure, and to create success. We believe that by creating systems in processes that release and support people using their creative potential at work not only creates a better place to work, but also creates excellent HSE performance.

Policies

All HSQE policies shall be displayed in the relevant office and site locations via a QR code (where possible). This allows for ease of access to both external and internal stakeholders. All policies across the business will be reviewed on an annual basis to ensure relevancy.

Document: HSQE Management System
Version: v2.0
Effective Date 20240927

Other Yondr policies in relation to People (human resources), IT, Risk, Security can be found Sharepoint. These shall undergo a yearly review.

Yondr Global Policies

Organisational Roles, Responsibilities, and Authorities

Central HSQE & Top Management Team

The central HSQE management team consists of people from the Operations pillar of the organisation, which is led by the Chief Operations Officer - Global Data Center Operations (COO) as representative for the top management. For each individual and future data center, a decentral team will be added to this central team for the HSQE management of that specific activity. For more detailed roles and responsibilities please refer to the HSE PEP.

Chief Operations Officer - Global Data Center Operations

The COO is the top management representative for the HSQEMS. From that role they shall assign the responsibility and authority to the central HSQE management team for:

- / Ensuring that the HSQEMS scope and boundaries are established.
- / Ensuring that the policies are relevant to the HSQEMS, objectives and targets are established and compatible with the direction of the business.
- / ensuring that the HSQEMS is established, implemented, maintained and continually improved.
- / ensuring that the HSQEMS conforms to the requirements of this document.
- / Ensuring action plans are approved and implemented to continually improve HSQE performance.
- / Ensuring the formation of an HSQE management team and that resources needed are available for the HSQEMS.
- / Communicating the importance of conforming and an effective management system
- / reporting on the performance of the HSQEMS and improvement of HSQE performance to top management at determined intervals.
- / establishing criteria and methods needed to ensure that the operation and control of the HSQEMS are effective.
- / Ensuring processes are established and implemented to identify and address changes to the HSQEMS.
- / Promoting continual improvement

Yondr and individual department organisational charts can be located on HiBob under People. (note, HiBob is only available to Yondr staff)

Top management ensures that the responsibilities and authorities for relevant roles are assigned and communicated through job descriptions, banding allocation and the below.

Document: HSQE Management System
Version: v2.0
Effective Date 20240927

The members of the central HSQE management team are:

VP HSE

- / Accountable globally for legal compliance and obligations in regard to health, safety, quality and environmental management, and ensure control measures are in place.
- / Accountable for the effectiveness of Yondr's HSQE management systems
- / Responsible for the deployment of HSQE policies across the organisation and that they are compatible with the strategic direction of Yondr
- / Supporting other relevant management roles to demonstrate leadership

Continuous Improvement

- / Manage and lead the Group Audit Programme
- / Lead and prepare multi-disciplinary teams for company audits, assessments and inspections from all accreditation bodies.
- / Ensure the company remains compliant with ISO 9001, 14001, 45001, 27001, 23201 & 50001.
- / Budget setting and control of external auditing and consultancy
- / Lead and develop the Continuous Improvement Programme delivery.
- / Create, assign and manage Continuous Improvement plans following external and internal reviews.

Environmental Manager

- / Conduct Continuous Improvement Reviews based on ISO 14001
- / Provide subject matter expertise advice to projects and support the HSE Directors
- / Provide input into the development of appropriate local objectives, plans and actions.
- / Support the delivery of the Yondr ISO 14001 Environmental Management Systems on projects.
- / Work with the Directors of HSE to ensure environmental and sustainability is embedded into contractor management and evaluation.
- / Support with the development of the reporting, evaluation and analysis of environmental performance data including environmental KPIs.

HSE Regional Directors

- / Responsible for legal compliance for HSE in respective region
- / Implementation of Yondr's Management system across, projects, facilities, and corporate offices
- / Manage local HSQE team members.
- / Lead regional HSE Steer Groups and be a part of the regional senior leadership teams.
- / Contribute and share best practices with the global HSQE team.

HSEQ coordinator

- / HSQE administration
- / Data collection, consolidation, and analytics
- / Team communications and internal Yondr communications
- / Team coordination

Document: HSQE Management System
 Version: v2.0
 Effective Date 20240927

- / Management of Safety Culture
- / Legal and regulatory reviews and forecasting.
- / Supplier reviews and early-stage onboarding.
- / Ownership of HSQE internal intranet page.

Continuous Improvement Coordinator

- / Administration of the Group Audit Programme.
- / Facilitation of internal audits and improvement events.
- / Development of reports and dashboards on CI.
- / Improving and implementing CI tools.
- / Management of CI communications.
- / Management of ISO corrective actions.
- / Assist with new and existing accreditation readiness to ensure compliance

Apart from the above-mentioned roles, both COO and VP HSE can request support from other roles within the Yondr organisation when needed to contribute to their tasks.

Decentral HSQE management

The following roles and responsibilities listed below are localised to the design & construction and operations. The roles below support the project and site teams as well as the central HSQE management team members listed above.

Data Center Operations Manager

- / Ensure operations are Healthy & safety compliant - including all environmental aspects
- / Deliver Yondr data center service as contracted by our customers.
- / Maintain and operate the data center to establish optimal availability of the infrastructure against minimum costs.
- / Site organisation including third party service provider.
- / Customer relation and satisfaction
- / Reporting to all stakeholders: customer, management
- / Drive and share continuous improvement of design, delivery and all operations aspects: reduce costs, improve revenue.
- / Site operations and project budgets (P&L)
- / Provide continual support to the team and audit these procedures to ensure continual improvement and enhanced customer experience.
- / Develop / build / support Yondr operations activities globally.

Regional Operations HSE Manager

- / Represent Yondr in its capacity as a client / owner.
- / Monitor, observe and support the operational facility to deliver and maintain HSE excellence in line with its Global HSE Performance Expectations for DC Operations
- / Complete timely inspections and audits in line with project/facility schedules
- / Support Yondrs' Campus Operations Managers and operational team in subject matter expert advice regarding HSE.

Document: HSQE Management System
 Version: v2.0
 Effective Date 20240927

- / Support Vendors and General Contractors in reviewing of adverse events.
- / Maintain Client / Customer relationships in regard to their respective areas.

Site and Senior HSE Manager (D&C)

- / Represent Yondr in its capacity as a client / owner specific to Design and Construction
- / Daily Monitoring, observe and support the project / facility to deliver and maintain HSE excellence through the General Contractor in line with Yondr's Global HSE Performance Expectations DC Construction
- / Complete timely inspections and audits in line with project/facility schedules
- / Support Yondr's' Project Directors and site teams in subject matter expert advice regarding HSE.
- / Support Vendors and General Contractors in reviewing of adverse events.
- / Maintain Client / Customer relationships in regard to their respective areas.

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Version: v2.0
Effective Date 20240927

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Planning

Actions to address risks and opportunities

In this section the actions to address risks, issues, and opportunities (RIO) that apply to the whole scope are described. There is now a single register of all RIOs developed using Smartsheet, providing filtered views, reports and dashboards for each function, department, and project. All RIO owners, project and leadership teams have access to the register. You can request access using this [form](#).

For the individual project sites and data centers, the access to separate documents are held by the site teams, however access shall be made available to the HSQE management team upon request.

The following links are the risk policy and framework, the framework includes the risk conformance rating which is used as a standard across the business.

[Risk Management Policy](#)

[Risk Management Framework](#)

Environmental Aspects & Impacts

Yondr has established, implemented, and maintains an aspects and impacts register for each location that is included under the management system. The register is updated based on changes in the operations and offices environment, and items are immediately controlled and implemented.

Aspects and impacts for the operational sites are maintained by the FM provider/GC and local HSE manager and the Aspects and impacts for office locations are reviewed by the environmental manager and office managers. The registers are stored locally and access to these are given by the central HSQE management team.

The register at a minimum reviewed every year by the FM Provider and local HSE manager/Environmental Manager.

[Aspects and impacts Guidance](#)

Compliance Obligations

Yondr uses a system called Enhesa to monitor compliance obligations. Enhesa is used in each region and country Yondr operates in unless it is a hot desk shared facility with less than 5 people.

The central HSQE management team is accountable for ensuring Enhesa is kept up to date, however the responsibility for reviewing and providing evidence of compliance to local regulations sits with the local HSE managers.

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Effective Date 20240927

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Enhesa compliance rates are reviewed every month by the central HSQE management team, the system automatically calculates the compliance against applicability. This then forms part of the monthly reporting to ELT and SLT.

Enhesa goes through a review every 3 months to ensure applicability and compliance. This is conducted manually via an excel spreadsheet and is owned by the Central HSQE management team.

[Link to Enhesa manual](#)

[Link to Enhesa](#)

Objectives and Targets

Objectives and targets are set at the end of Q4 for the following year by each department, these are then reviewed live on Culture Amp throughout the year and formally every 6 months for progress updates. The progress on the objectives contribute towards yearly performance. Objectives and targets shall be set by all functions, departments, and sites within the system CultureAmp. Objectives should feed into ELT objectives that are set each year. Functional, departmental and site owned objectives are sat with the team owners.

[Link company wide objectives & Guidance](#)

Change Management

Change management is managed differently dependant on what the change is, listed below are different variations of change management used throughout Yondr.

Governance Committees

Governance is established for key processes ensuring key commercial controls are in place and effective for achieving business growth and regulatory compliance. Governance committees provide a forum for collaborative, collective and strategic decision making, while ensuring appropriate documentation is maintained for financial, audit and administrative purposes. The corporate governance framework at Yondr provides enhanced Yondr decision making, improved financial performance, mitigation of risks and ensures alignment of resources and activities to deliver business plans.

There are 8 committees within Yondr as detailed below;

- / Audit Committee – Is Chaired by the CFO. The objective of this committee is to monitor and ensure the integrity of financial reporting and its processes. Approve the selection of an external auditor.
- / Capital Committee – Is chaired by the CFO. The objective of this committee is approval of all capital expenditure relating to development and construction projects.

Document: HSQE Management System
Version: v2.0
Effective Date 20240927

- / Deal Pricing Committee – Is chaired by the CFO. The objective of this committee is approval of pricing requests at each decision gate leading up to the disclosure of a price to a customer.
- / Finance Committee – Is chaired by the CFO. The objective of this committee is to set financial goals, objectives, and annual budget. Track audit and tax compliance.
- / Risk Committee – Is chaired by the CFO. The objective of this committee is to review company risks and approve mitigation measures.
- / Remuneration committee – Is chaired by the CPO. The objective of this committee is to review and approve any changes to financial impact as it pertains to compensation.
- / Sustainability Committee – Is chaired by the CDO. The objective of this committee is to deliver the Yondr sustainability strategy with board level accountability on driving progress and strategic decision making.
- / Technology and Business change committee – Is chaired by the CFO. The objective of this committee is for approval of all technology and business change requests.

To access meeting minutes, process flow diagrams and to submit a change request through a governance committee the follow link should be used.

[Yondr Corporate Governance Landing Page](#)

Design Management Change

Details of the [design management change process](#).

Quality Assurance and Commissioning

Yondr is committed to a Safe Quality Right the First-Time project through a predictable quality culture from initial design through commissioning to promote an environment for all workers to speak up, take pride in their work and their contribution to the delivery of the facility.

The linked document below outlines the Yondr expectations for Quality Assurance in Design & Construction projects. The essence of quality is at the heart of performing work safely, most cost effectively and on schedule. Reducing cost of rework, applying lessons learned for Improvement, and planning one's work are key tenets to Good Manufacturing Practices.

Yondr, the Owner is defining the Quality Assurance expectations for building construction through the Division. The GC/CM will then provide Quality Control in response to verify our expectations are met.

[Link to Quality Plan](#)

HSE Global D&C Expectations

The central HSQE management team owns and maintains a set of HSE performance expectations for the design and construction team supply chain. Performance expectations in each region shall be reviewed by a local SME to ensure that all local regulations are also included. The expectations are included in the supplier contract to highlight what is required in terms of HSE before they arrive on site.

Document: HSQE Management System
Version: v2.0
Effective Date 20240927

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During the project kick off the Yondr team shall run through the expectations to ensure contractors fully understand what is required of them.

Once the expectations have been included into the contract they cannot be changed unless it is a major change. Any other changes shall be included into the contract which is issued at a new project stage. The performance expectations shall at a minimum be reviewed annually by the central HSQE management team.

Yondr HSE Global Ops Performance Standards

The HSE performance standards are owned by the central HSQE management team, they outline what Yondr expects from the FM provider and how the data center should be run from an HSE perspective. The Performance standards are issued to the FM provider at contract stage and are explained through the kick off meetings.

Once the expectations have been included into the contract they cannot be changed unless it is a major change. Any other changes shall be included into the contract which is issued at a new project stage. The performance expectations shall at a minimum be reviewed annually by the central HSQE management team.

Mobilization Plan

The Global Mobilization Program develops and maintains processes, procedures, and supporting tools to facilitate a complete and timely transition of a data center construction project into an operational campus in collaboration with all Yondr business pillars and functional areas using a global approach that is consistent, efficient, and scalable.

Key Stakeholders:

- / Executive Sponsor: VP DC Operations – Americas
- / Program Leads: Mobilization Manager
- / Primary Internal Customers: D&C, People, and DC Ops Teams
- / Primary External Customers: Facilities Management Service Providers

The Mobilization program activities ensure that Ops is ready to operate and maintain each data center to safely meet contractual obligations (including but not limited to Early Access and Ready for Service milestones). The mobilization program toolkit ensures that each site builds operational readiness in a consistent manner, with the ability to adapt to local conditions when required. This consistency aligns with Yondr's vision and is highly valued by our clients. The program activities include key hand-off points with our XFN partners (e.g., delivery of as-built drawings, planned hiring dates). With schedules integrated with the main construction schedule, the mobilization program ensures a coordinated approach across Yondr functional pillars to ensure Operational Readiness.

Document: HSQE Management System
Version: v2.0
Effective Date 20240927



The plans are held locally for each project and contained within Smartsheets.

Document: HSQE Management System
Version: v2.0
Effective Date 20240927

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Resources

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Procore

Is a construction management software tool that Yondr use to manage construction projects (it is used alongside SharePoint & or other tools used by either the GC or Yondr). Procore is used as the reporting platform for all activities, not just HSE. From a HSE perspective, Observations, Incident notifications, inspections progress meetings/minutes are stored on this platform (if SharePoint or Safety Culture is not used)

Aconex

Can also be used alongside Procore within the D&C environment (not all) and stores all the documents during the different stages of the project, it is managed by all the stakeholders involved in the project and controlled by the GC. It has a repository of all documents and its different versions across the lifecycle of the project, Aconex will provide the appropriate tools to create the workflows for the revision and approval of the documents, it also incorporates comments and markups.

YondrONE

Automates Yondr's Operations maintain and operate model and is the platform. Yondr's very own CAFM system.

SafetyCulture

A mobile and web-based application that is used to carry out inspections, audits and action management that are stand-alone outside of Construction Projects and live data centers.

ENHESA

A web based regulatory forecasting tool that we use to check the legal requirements for all entities, facilities and construction projects that are under control by Yondr.

Smartsheet

A web based collaborative work management tool. It can be used to assign tasks, track projects, management shared document and other works using a tabular interface. Smartsheet is used to manage various items across the business for example (not limited to) – Audit programme, continuous improvement plans and the mobilisation plan.

CxAlloy

Aa highly effective and intuitive cloud-based commissioning software. This is the tool used by the QA Cx program to execute required checklists and manage the resolution of identified deficiencies.

People

To run the HSQEMs, human capacity is needed for the execution of the various tasks. The roles identified are listed and described in the Organisational roles and responsibilities section of the MS.

Document: HSQE Management System
Version: v2.0
Effective Date 20240927

Competence

Job descriptions given at Yondr which are owned by individuals and/or the People team identify the necessary competence of persons doing work under its control that affects its HSQE performance and HSQEMs.

Competences within locations under the management system are reviewed through the internal audit.

Individual competences are reviewed formally every 6 months through performance reviews, these reviews take place against meeting objectives, banding requirements (linked below), Yondr values and peer reviews.

[Yondr Employee Banding](#)

Awareness & Training

All Yondr staff shall undergo mandatory training within the Yondriversity platform. The mandatory training must be conducted by all Yondr staff, and a refresher shall be undertaken each year.

[Yondriversity Onboarding Must Haves](#)

All new Yondr Ops staff shall undergo ISO and Environmental awareness training which shall be given by the Environmental Manager and Continuous Improvement function before handover to ensure the team is fully aware of all requirements.

All staff working on a project, site or office shall undergo an induction – all inductions are given and held locally. For induction requirements please refer to the HSE Performance requirements for construction and operational sites.

Each construction and operational data centre shall keep and maintain their own training matrix of what is required for high risk works and shall be held by the local teams.

Communication

The HSQE team shall manage a community's page on the company intranet – Yondrverse – this shall allow employees to make comments, suggest improvements or to highlight any HSQE issues or best practices. The communities page shall also house the HSQE policies and HSE expectations. (note. Yondrverse is only available to Yondr employees)

The comms plan is owned by the communications manager and determine the internal and external communications relevant to the HSQEMs

[HSQE Yondrverse](#)

Comms plan & process

Document: HSQE Management System
Version: v2.0
Effective Date 20240927

Documented information

ISO 45001, 14001 & 9001 mentions two types of documented information to be available:

- / information required by the standard itself;
- / documented information determined by the organisation as being necessary for the effectiveness of the HSQEMS and to demonstrate HSQE performance improvement.

All documentation listed in the below tables are issued and managed through the document control procedure (linked below).

All documents shall be created in the English language unless specified otherwise (in the description).

Procedure	Policies
Description / action(s)	All policies shall be reviewed each year by the policy owner and by ELT for sign off. Policies are housed within SharePoint and are available within Yondrverse. Policies applicable to the MS are also shown within locations via QR codes (where possible).
Link to separate document	Link to Policy Central Link to Policy Register
When	Every year
Accountable	Policy owners

Procedure	Objectives, targets and planning to achieve them.
Description / action(s)	Objectives and targets shall be created at the beginning of each calendar year and progress shall be reviewed quarterly by each department.
Link to separate document	Link to ELT objectives Link to HSQE Objectives
When	Every year, with quarterly reviews
Accountable	Everyone working with the system

Procedure	Monthly reporting and evaluation
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Document: HSQE Management System
Version: v2.0
Effective Date: 20240927

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Description / action(s)	<p>Each month, for each site and operational data center an evaluation shall be conducted to monitor progress on the execution of the plans and HSQE performance.</p> <p>On a central level, these evaluations shall be aggregated to one document, which shall be given to ELT for presentation in the monthly company wide meetings.</p> <p>The reports shall be kept as documented information on a data center and central level.</p>
Link to separate document	Link to ELT regional business updates
When	Once every month
Accountable	<ul style="list-style-type: none"> • Data center level: Site Manager • D&C: Project directors • Central level: VP HSE

Procedure	Yearly review – Business Planning
Description / action(s)	<p>Each year reviews shall be conducted for each business unit. This shall be done using given document for this purpose.</p> <p>Each review shall be handed to the ELT as input for the company wide business review.</p> <p>The reviews shall include but not limited to; Objectives – past and future Resource planning Risks & Opportunities Budget setting</p>
Link to separate document	Held locally
When	Q3 each year
Accountable	∅ SLT & relevant teams

Procedure	Aspects & Impacts
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Document: HSQE Management System
 Version: v2.0
 Effective Date: 20240927

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Description / action(s)	Aspects and impacts register for each location that is included under the management system. <ul style="list-style-type: none"> / The register is updated based on changes in the environment. / Items are immediately controlled and implemented. / Operational sites are maintained by the local HSE manager. / Office locations are reviewed by the environmental manager and office managers.
Link to separate document	Sits locally within each location
When	Continuously with an annual review
Accountable	Local HSE Managers Environmental Manager

Procedure	Permit Consent Licence (PCL)
Description / action(s)	The PCL register shows all permits and compliance regulations. D&C – Managed by consultant mentioned within D&C HSE expectations. Ops – PCL register is reviewed once per year and is audited once by year by the Environmental Manager. PCL is through smartsheets. To ensure no changes to actions required.
Link to separate document	HSE Permit Consents & Licence Process
When	Continuously
Accountable	D&C – Consultants Ops – Local Ops team Environmental Manager

Procedure	Suggestions for improvement of the MS and performance
Description / action(s)	<ul style="list-style-type: none"> • Every person doing work under the organisation’s control can comment or suggest improvements to the MS and HSQE performance if they identify them.

Document: HSQE Management System
Version: v2.0
Effective Date: 20240927

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	<ul style="list-style-type: none"> • There is an email address on which all personnel can make suggestions on how to improve the MS on the HSQE YondrVerse page and on how to improve HSQE performance in general.
Link to separate document	-
When	On occurrence, continuously.
Accountable	<ul style="list-style-type: none"> ∄ Doing suggestions: Every person doing work under the organisation's control. ∄ Receiving and evaluation of comments / suggestions: HSQE team

Procedure	Complaints and Satisfaction - Internal
Description / action(s)	<p>Speak Up Policy – for colleagues and third parties to raise genuine concerns. A review and investigation shall take place and Yondr shall decide on the outcome.</p> <p>Yondr Talks survey allows Yondr to get employee feedback on how they are doing and how they can further improve. Results are communicated across the business and goals are set based on results of the survey.</p>
Link to separate document	Speak Up Policy Yondrtalks Info
When	<p>Speak Up – Continuously</p> <p>YondrTalks – every 6 months</p>
Accountable	<ul style="list-style-type: none"> ∄ Yondrtalks – all Yondr employees ∄ Speak Up – all Yondr employees, third parties & People team for follow up

Procedure	Complaints & Satisfaction - External
Description / action(s)	<p>Managed on an ad-hoc basis. Where Yondr has specific customers, we have ongoing cadence with customers during each phase of the project.</p> <p>Meeting minutes are kept and tracked by the project lead of the specific project.</p> <p>Any problems/issues are raised in these meetings. Category of problems/risks are based on yondr risk category.</p>

Document: HSQE Management System
Version: v2.0
Effective Date: 20240927

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	<p>Client solutions is responsible for the tool Hubspot this tracks all customer engagements and circulating meetings. There is a QBR section for critical items which is circulated to the client.</p> <p>Surveys are given to the client yearly this owned and responsible by client solutions team. Marketing will issue the surveys to the client. Client solutions to manage the responses and create action plan.</p>
Link to separate document	=
When	Continuously
Accountable	<p>≠ Project Leads</p> <p>≠ Client Solutions Team</p>

Procedure	Evaluation of compliance with requirements
Description / action(s)	Yondr shall evaluate the compliance with legal requirements and other requirements within Enhesa.
Link to separate document	Link to Enhesa
When	Continuously
Accountable	HSQE Coordinator Local Operations teams

Procedure	Internal Audit (Internal Review)
Description / action(s)	<p>Internal Reviews (Audits) are conducted on each location, site and operational data centre as per scope of the business.</p> <p>Internal reviews are set via the review schedule which is planned 2 years in advance.</p>
Link to separate document	<p>Link to audit procedure</p> <p>Link to audit schedule</p>
When	As per audit schedule
Accountable	Continuous Improvement

Document: HSQE Management System
Version: v2.0
Effective Date: 20240927

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Procedure	Corrective action on non-conformities
Description / action(s)	<p>On non-conformities that are identified during the internal and external audits, corrective action shall be taken.</p> <p>Continuous Improvement Plans shall we used to track corrective actions raised from root cause analysis workshops after internal and external audits.</p> <p>Non-conformities raised on a D&C location shall be raised, tracked and monitored via Procore (or the tool of choice on the project)</p>
Link to separate document	Link to CIP Register
When	On occurrence, when nonconformities are identified.
Accountable	Continuous Improvement

Control of documented information

Documented information required by the HSQEMS and by this document shall be controlled to ensure:

- / it is available and suitable for use, where and when it is needed.
- / it is adequately protected (e.g., from loss of confidentiality, improper use, loss of integrity).

The documented information is available in various locations depending on the type of document and dependant on the function. Most documents are stored on the organisation's SharePoint storage, with links to them provided in this document.

The HSQE monitoring data is kept within the YondrOne system for Operational datacentres and Procore and or Sharepoint/Safety Culture for construction projects. Access to documents can be assigned on an individual basis on all systems listed.

Documented information of external origin determined by the organisation to be necessary for the planning and operation of the HSQEMS shall be identified, as appropriate, and controlled.

[Link to Procore User Guide](#)

[Link to HSE Document Control Procedure](#)

Document: HSQE Management System
 Version: v2.0
 Effective Date 20240927

Operations

Operational planning and control

Yondr has established, implemented, and maintains operation control procedures to manage HSQE. The following procedures are relevant to the operational facilities only. For construction projects, refer to the planning section.

Yondr ensures that all operations and its activities carried out by both employees and/or contractors are properly controlled and all procedures are communicated.

Asset Management

An asset is an item, thing or entity that has potential or actual value to an organization. The value will vary between different organizations and their stakeholders, and can be tangible or intangible, financial, or non-financial. Furthermore, assets consist of systems and components with capital value that are needed to ensure SLA (Service Level Agreement) uptime to the facility, to sustain/maintain statutory compliance, or identified to be exceptional enough to be managed. For tracking purposes, assets are managed within an asset register.

[Yondr Ops Asset Register Requirement](#)

Yondr Ops HSE Framework Plan

Yondr has created and maintains an Ops Framework plan which identifies all expectations, deliverables, and actions for the Yondr Operations team in terms of health, safety and environmental requirements. This document is given to the Yondr operations team and to the FM provider via a kick off meeting where the central HSQE management team run through all expectations, this is done within a minimum of 4 months before RFS.

The document contains various categories that need to be met such as; Audit and assurance, Communication and consultation, Contractor Management, Environmental and Waste Management, Health and Wellbeing Management, Incident and Emergency Management, Legislative and Statutory Requirement, Performance Management and Reporting, Risk Management, Training and Competency Management. The framework plan shall be split into regions to ensure all regional/local requirements are met and highlighted.

The deliverable dates are set, monitored and tracked by the central HSQE management team, however it is the local Yondr operations and FM providers responsibility to ensure evidence is uploaded within the set time frames.

Document: HSQE Management System
Version: v2.0
Effective Date 20240927

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Reviews are conducted annually by the central HSQE management team to ensure dates and evidence of each requirement has been met/in place. The items are then marked as complete as they are compliant. co

[Link to Yondr HSE Framework Plan](#)

Maintain and Operate Model

Maintain and operate model is a holistic strategy that combines proactive maintenance practices with effective operational procedures. This integrated approach aims to minimize downtime, enhance reliability, and ensure the continuous availability of critical systems. Each piece of the model has a unique meaning and purpose of the overall strategy.

Maintain: This aspect involves activities related to the ongoing care, upkeep, and preservation of the critical facility.

Maintenance tasks include routine inspections, preventive maintenance, repairs, and upgrades to ensure that all systems and equipment are in optimal condition over the entire life cycle of the asset. The goal is to identify and address potential issues before they cause disruptions to the critical operations.

Operate: This involves the day-to-day operational activities necessary for the smooth functioning of the critical environment.

Operational tasks include monitoring critical systems, responding to alarms and alerts, managing resources such as power and cooling, and ensuring overall security. The focus is on maintaining optimal conditions for the equipment and systems to operate efficiently.

[CEM Maintain and Operate Model](#)

Emergency Preparedness and Response

Yondr has established, implemented and maintains emergency preparedness and response procedures which identify potential emergency situations and responses to those situations in order to prevent and/or mitigate any HSQE impacts and/or issues that are associated.

Each Yondr office and data centre holds its own Emergency Preparedness and Response procedure.

[Link to Incident Management](#)

The D&C function utilises the main general contractor procedure as they are the main contractor on the sites, however the requirement for implementing this is contained within the Yondr D&C HSE Expectations.

Version: v2.0
Effective Date 20240927

Incident and Escalation

The purpose of the incident escalation and management process is to facilitate efficient and effective responses to incidents by creating a consistent language and sets of responses to incidents. As defined by the Yondr Business Continuity Plan (BCP), an incident may be any situation which might or could lead to a disruption, loss, emergency, or crisis affecting the normal operations of Yondr.

This process applies to all unplanned events / incidents that occur within Yondr offices / data centers and/or involve Yondr employees.

Note that in some instances, specific Yondr teams (e.g., operational and/or construction sites) will generate tailored incident / event management processes to provide additional detailed guidance and ensure consistent responses across various locations.

[Link to Yondr Business Continuity Plan and Policy](#)

Design

Design & development of products and services

Yondr has an established Design Process for the delivery of Data Centres on a Global Scale as well as established Products (Blueprint Designs) for use within this design process. The Design Process is a 'continuous improvement' process which takes account of HSQE lessons learned on each Yondr Project.

The 'Hyperbloc' Product is utilised globally to ensure a repeatable, predictable, dependable (RPD) design and outcome for each Yondr Project. Using this product, the Yondr Design Delivery team manage our supply chain to ensure the delivery of Design in line with the RPD strategy.

Requirements of products and services

Yondr has implemented the Design & Development Procedure which defines the activities that are required to provide effective products and services.

The organisation considers HSQE performance improvement opportunities and operational control in the design of new, modified and renovated facilities and equipment that can have a significant impact on its HSQE performance over the planned or expected operating lifetime.

Where applicable, the results of the HSQE performance consideration shall be incorporated into specification, design and procurement activities and captured in updated 'Hyperbloc' design standards for incorporation in new projects moving forward.

Control of externally provided processes, products and services

During the Design Process – the external supply chain is managed/tracked by several standard Design Management Documents;

Document: HSQE Management System
Version: v2.0
Effective Date 20240927

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Design Management Tracker (Lessons Learned, Permit Tracking, Project Risk Tracking)
Design Deviations Tracker
Global Standards
Change Management

The above ensure consistency in delivery of design through Yondr's Design & Development process and ensure consistency in internal reporting across the business.

Release of products and services

Yondr utilises Procore and or SharePoint for all projects – this enables a consistent, centralised platform for information release with the correct responsibilities assigned for workflow review. The design supply chain generate and release design information to the Procore platform (or another that is used) while adhering to the Yondr Global Standards which include, but are not limited to, Design, Reporting, Deliverable Naming, Asset Naming, Risk allocation.

Yondr's Global Standards are updated and released periodically – based on the lessons learned, continuous improvement and emerging sustainability target updates from the Yondr Sustainability team/regional sustainability legislation.

Control of non-conforming outputs

The Design Delivery team lead the conformance of the project to design, permitting, sustainability and quality utilising the tools mentioned above. Non-conformances should be reduced upon delivery of the service/product as a result of Design Team leadership, however the Design Deviations Tracker and Technical Quality Review forms are in utilised to record non-conforming deliverables.

These non-conformances are registered on Procore (or another platform that is used) for action/closeout by the supply chain and are reviewed by the design team on an iterative basis to ensure products/services adhere to the Yondr Global Standards.

Procurement

Yondr uses a system called Canopy to manage contractor onboarding. Canopy conducts credit and legal requirement checks before a contractor is uploaded onto the system. Yondr currently does not have a preferred supplier list. Each supplier once they go through the question set will automatically set which questions are relevant to them i.e. a smaller business with lower risk will answer different questions to a main contractor – it will be based on risk.

The central HSQE management team reviews all contractor's compliance against the HSE set questions. These reviews are done per new release of contractor. Information that expires will automatically get released back to the contractor so there is no manual review process. Evaluation checks will be conducted throughout the relationship to highlight risks, performance on and ongoing basis.

Version: v2.0
Effective Date 20240927

Performance evaluation

Monitoring, measurement, analysis, and evaluation of HSQE performance and the MS

Yondr has an established reporting process which consists of the following;

- / Monthly HSE project report
- / Monthly HSE board report

Aside from the following the central and decentral HSQE team also feed into the following reports on an adhoc basis.

- / Client specific reports
- / Yearly ESG report (owned by the Sustainability team)

The HSE managers are responsible for issuing all information for the reports. The HSQE central management team are responsible for gathering all information and creating the report. The data that is input into the Monthly HSE project reports is consolidated for the monthly board report.

The monthly project reports are issued to the project director and team on the project. It consists of the following (but is not limited to);

- / Capacities
- / Global HSE Performance
- / Inspection scores & breakdown
- / Critical control effectiveness
- / Planned vs Action HRA & Leadership tours
- / Observations and closeout rate
- / HRA Observations
- / Events – Details & Learnings
- / Reactive and Proactive Learning
- / PLC (Proactive Learning Capacity) & RLC (Reactive Learning Capacity)
- / Monthly HSE Inspection – Environmental breakdown
- / Recycling rates

The monthly board report is issued to the executive leadership team and consists of the following (but not limited to);

- / Events
- / Client project breakdown
- / Event Categories
- / Workhours
- / Events - details & learnings
- / HRA Event Matrix

Document: HSQE Management System
 Version: v2.0
 Effective Date 20240927

- / Inspection Scores
- / ISO / Audit Status

ESG – Environmental, Social and Governance

Environmental, Social and Governance (ESG) is led by our ESG Manager but delivered by the business. It involves ensuring we have the policies, processes, controls, and data collection methods to ensure we are acting ethically, responsibly and sustainability. This touches on all parts of the business and issues can include our carbon footprint, labour standards, responsible procurement, and several other areas. We are in scope of ESG regulation, including the Corporate Sustainability Reporting Directive (CSRD) and the EU Taxonomy, which will require us to report publicly on ESG issues that are material to Yondr.

Internal Reviews

Internal audits shall be referred to as internal reviews.

The internal review is owned and led by the Continuous Improvement function. The internal review schedule is based on needs/requirements from the business, risk and results found from previous reviews. At a minimum each project shall be reviewed once every year.

All continuous improvement plans shall also undergo an evaluation after closure to ensure it's effectiveness, details of this are contained within the review procedure.

[Review procedure](#)

[Review schedule](#)

All internal review findings shall undergo a root cause analysis workshop, this ensures that findings are being effectively closed and ensures the outcome is resolved across the business and not only locally.

All continuous improvement plans shall also undergo an evaluation after closure to ensure it's effectiveness, details of this are contained within the review procedure.

HSQE reviews

HSQE reviews shall also be conducted monthly and 6 monthly on both D&C sites and operational sites by the HSQE and leadership teams.

These reviews shall be contained and tracked within the system Safety Culture. The purpose of these reviews is to ensure compliance to HSE requirements/expectations, ELT/SLT and HSQE leadership and to act as an impartial party for the site teams. The following reviews currently take place;

- / Yondr leadership site safety walk – This is conducted by the ELT/SLT/Senior site management
- / Monthly Construction audits – This is conducted by the HSE site managers
- / Monthly Ops audits – This is conducted by the HSE site managers

Document: HSQE Management System
Version: v2.0
Effective Date 20240927

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- / 6 monthly HSE Performance audits – This is conducted by the HSE Directors of region, this is a comparison on how site is doing against performance requirements.
- / Spot checks – This is conducted by the HSE Managers on site or by GC

[Link Safety Culture](#)

Management review

Top management shall review the organisation's HSQEMS once a year to ensure its continuing suitability, adequacy, effectiveness and alignment with the strategic direction of the organisation. This is done alongside the reporting requirements and business planning.

Outputs of the management review

All actions raised within the HSQE management review shall be documented and tracked within Safety Culture.

[Link to Management review guidelines](#)

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Version: v2.0
Effective Date 20240927

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Improvement

Nonconformity and corrective action

External audit non conformities raised are logged on the linked NCR Log and are controlled via continuous improvement plans (linked register). This is managed and maintained by the continuous improvement function. These are checked twice upon closure, the time frame for the effectiveness check is dependent on type of finding and whether it was internally or externally raised. The time frames can be found within the audit procedure.

[NCR Log](#)
[CIP Register](#)

A NC raised on an operational site shall be controlled via YondrOne. There is engagement with the facilities provider (CBRE) to undertake a RCA and raise a ticket via YondrOne to ensure closure of any actions.

Continual improvement

Yondr strives to continually improve its HSQE performance by using the following tools;

[Internal reviews and root cause analysis](#)

Learning teams

A Learning Team is an ad hoc team of subject matter experts who are brought together to discuss a particular task or process with the goal of understanding how it is working in practice (not just how it is supposed to work) and opportunities to improve the task or process.

Actions that arise from a learning teams session are tracked and monitored on Smartsheet's or applicable tool used on location (i.e. YondrOne, Procore).

[Link to Learning teams procedure](#)

Rapid Insights

Rapid Insights is a process where a group of people with unique experience or insight on a given problem, challenge, or opportunity are engaged to identify how effectively existing processes are working and what opportunities there may be for improvement. The process is designed to be flexible, quick, and actionable.

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Version: v2.0
Effective Date 20240927

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After the Rapid Insights session, the facilitators should meet with the responsible person to discuss the outcomes of the session and develop an action plan. At a minimum the action plan must include:

- / Follow-up activities with due dates on those critical factors discussed in the session that require improvement.
- / A plan to communicate outcomes of the follow-up activities to attendees of the session within a reasonable time frame, but not more than one week after the session.

It is not expected that the responsible person will know the fixes to all the problems or challenges identified during the session.

All actions are tracked and monitored on the preferred system that is used at that location/site/project.

[Link to Rapid Insights procedure](#)

Project Management Office (PMO)

The PMO partners with teams across Yondr to deliver change and improvements to processes, policies, tools, controls, and organisation.

The PMO portfolio of projects will vary depending on business needs. Typically, the projects are cross-functional in nature, and drive business change that impacts people, process and technology. The comprises mainly of contractors, who are brought in to lead or support specific projects which require skills and experience that does not exist in Yondr.

[PMO Toolkit](#)

Anyone can submit a project initiation through the PMO by using the PMO Project Initiation Document (PID) template.

[PMO PID template](#)

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Version: v2.0
Effective Date 20240927

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Acronym & Glossary

CIP	Continuous Improvement Plan
CX	Commissioning
D&C	Design and Construction
ELT	Executive Leadership Team
FM Provider	Facilities Management Provider
GC	General Contractor
HSE	Health Safety & Environmental
HSQE	Health Safety, Quality & Environmental
HSQEMS	Health Safety, Quality & Environmental Management System
HRA	High risk activity
KPI	Key Performance Indicators
MS	Management System
NCR	Non Conformance report
PCL	Permit Consent Licences
PLC & RLC	Proactive learning Capacity & Reactive learning capacity
Ops	Yondr Operations team
RIO	Risk Issues Opportunities
SLT	Senior Leadership Team
VP	Vice President

Document: HSQE Management System
 Version: v2.0
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