

MANAGEMENT MANUAL

PHOEBE PRESENTATION

PHOEBE has been supporting major industrial players for over 20 years in the telecoms, defence and industrial sectors.

Based in Les Ulis, France, we have 700 m² of office space, 3,500 m² of warehouse space and 300 m² of laboratory space, as well as regional offices in Aquitaine and the PACA region.

PHOEBE has two subsidiaries abroad:

- PHOEBE Telecom Limited in England occupying office space, storage space and a laboratory for preparing equipment
- PHOEBE OPSEACOM in the United Arab Emirates.

Today, PHOEBE has just under 100 employees and employs almost 50 partner consultants, with a turnover of just under 20 million euros.

Our services focus on the following areas:

- **TURNKEY MANAGEMENT AND DEPLOYMENT OF WDM, IP AND ACCESS NETWORKS**
As an integrator of fixed terrestrial and submarine networks, Phoebe supports telecoms equipment manufacturers and operators, as well as new global digital players.
- **TECHNICAL ASSISTANCE, SKILLS DELEGATION AND CONSULTING**
Our ambition is to provide you with a technician or engineer with the technical skills and know-how you need, but also to do everything we can to create the conditions for a successful partnership.
- **DISTRIBUTION OF IT SOLUTIONS**
Active and passive equipment for industrial computing and telecommunications networks (PCs, IP, WDM, chassis, fibre optic cables, etc.), as well as added value (remote inventory management, hardware/software integration, etc.).

25 ans
d'expérience

+ de 100
techniciens et
consultants

+ de 50
pays
d'intervention

+ de 2000
sites déployés

+ de 10
ans
de confiance

PHOEBE Marketing strives for customer satisfaction through quality of work, respect for commitments, trust and innovation.

PHOEBE Management creates the conditions for employees to enjoy their work, through collective adventure, fulfilment, conviviality and respect.

To formalise everyone's commitments at Phoebe, we have of course subjected our day-to-day practices and processes to certification audits (ISO, Qualiopi, Ecovadis, etc.), but we have also put in place several voluntary behavioural charters on the environment, respect for others and shared working conditions (UN Global Compact).

Some of our customers:



Management Policy

PHOEBE's performance is based on :

- The skills of its human resources and their ability to innovate.
- The integrity and probity of its employees
- The efficiency of its organisation and its responsiveness in mobilising the appropriate resources.
- Long-term vision in its relations with customers and partners

Aware of the importance our stakeholders attach to these values, PHOEBE implements an integrated management system based on ISO 9001, ISO 14001, ISO 45001 and ISO 27001 standards, and has it certified to maintain its effectiveness.

- To maintain a sustainable level of performance while relying on an ambitious strategy, PHOEBE has formulated its policy around 7 axes:

Quality	Environment	Anti Bribery and Corruption	Responsible Purchasing
<ul style="list-style-type: none"> ✓ Greater customer satisfaction ✓ Efficient services ✓ A desire to maintain a good corporate image 	<ul style="list-style-type: none"> ✓ Monitoring our CO2 impact ✓ Optimising waste management ✓ Compliance with current laws and regulations 	<ul style="list-style-type: none"> ✓ Raising employee awareness ✓ A specific risk assessment for certain projects 	<ul style="list-style-type: none"> ✓ A selection of suppliers to encourage the most responsible purchasing possible
HR	Health and safety	Cyber	
<ul style="list-style-type: none"> ✓ Updating the skills and knowledge of our teams ✓ Good quality of social dialogue 	<ul style="list-style-type: none"> ✓ Preventing accidents in the workplace ✓ Compliance with current laws and regulations ✓ Carrying out health and safety audits on telecoms projects 	<ul style="list-style-type: none"> ✓ Compliance with legal and regulatory texts, in particular the RGPD ✓ Raising employee awareness ✓ An information protection strategy 	

Based on this policy, objectives are set annually by management and reviewed at each Management Review.

PHOEBE has placed exemplarity, risk management and compliance with current laws and regulations at the heart of its management system.

In addition to the policy, each area is broken down as follows:

QUALITY

As set out in the code of conduct signed by all our employees, the demand for a high level of quality must be anchored in our day-to-day work.

To deliver on its policy commitments, PHOEBE :

- Monitors customer satisfaction.
- Carries out self-assessments of its telecoms projects.
- Organises steering committees for customers who so wish.
- Selects and evaluates its partners.
- Seeks to develop its practices.

The elements implemented must enable PHOEBE to :

- ✓ Building customer loyalty in each of the Business Units.
- ✓ Handle customer requests as quickly as possible.
- ✓ Involving our partners in our progress initiatives.

Our ambition: We aim to contribute to Goal 8 of the UN Sustainable Development Goals for all BUs and to Goals 9 and 11 through our telecoms activities.



HUMAN RESOURCES

As an essential foundation for the company's development, our ambition is to create the conditions for employees to enjoy their work, through a collective adventure, fulfilment, conviviality and respect.

To deliver on its policy commitments, PHOEBE :

- Welcomes its employees with an induction day.
- Avoid as far as possible the use of precarious contracts.
- Takes into account the human dimension by paying attention to social links and preserving the quality of life at work.
- Combating all forms of harassment in the workplace.
- Monitors employee authorisations.

The elements implemented must enable PHOEBE to :

- ✓ Respect gender equality in terms of equal pay, working conditions and access to positions of responsibility.
- ✓ Promoting equal opportunities through gender diversity in the workplace and initiatives to help people with disabilities.
- ✓ Building employee and customer loyalty.

Our ambition: We want to contribute to goal 5 of the UN's Sustainable Development Goals. Even if, for this goal, compliance with legal and regulatory requirements is our main contribution.



ENVIRONMENT

Aware that every activity has an environmental impact, a sustainable approach necessarily includes vigilance and action to reduce impacts.

To control and reduce its impact, PHOEBE :

- Take out a subscription to monitor legal and regulatory developments.
- Evaluates its environmental aspects to select the most significant ones.
- Promotes environmental sobriety in its welcome booklet.
- Implements waste sorting at head office.
- Tracks its CO2 emissions.
- Track the building's energy consumption.

The elements implemented must enable PHOEBE to :

- ✓ Limiting the progression of impacts despite growth.
- ✓ Raising employee awareness so that they become part of the collective approach.
- ✓ Reduce as far as possible the proportion of waste subject to the TGAP.
- ✓ Effectively manage any unwanted events that may occur, in particular by reporting them quickly.

Our ambition: to contribute to targets 12 and 13 of the UN's Sustainable Development Goals



HEALTH AND SAFETY

It's impossible to promote your employees without implementing a system to protect their health and maintain a high level of safety. That's why PHOEBE :

- Maintains its single occupational risk assessment document, together with its action plan to reduce residual risks
- Organises a dedicated meeting with the Social and Economic Committee 4 times a year
- Analysis of workplace accidents
- Raising employee awareness
- Follows the supply of Personal Protective Equipment

Every effort is made to :

- Providing safe and healthy working conditions
- Comply with current health and safety legislation
- Eliminating hazards and reducing risks
- Continuously improving employee health and safety
- Involving employees and their representatives to improve the system

Our ambition: to contribute to UN Sustainable Development Goals 3 and 8



CYBER

With a view to continuous improvement in cyber and data protection, PHOEBE has :

- Mapping risks and formalising safety objectives using the EBIOS method.
- Define and implement a basic foundation for securing fixed and mobile PCs.
- Mapping the processing of personal data.
- Draw up a data processing register.
- Appoint a Data Protection Officer.
- Backed up its data in a French data centre with ISO 27001 and 50001 certification.

The elements implemented and maintained must enable PHOEBE to :

- ✓ Showcasing and demonstrating your commitment to respecting the rules.
- ✓ Helping our employees and stakeholders to understand the challenges of cybersecurity.
- ✓ Offer a high level of data security.
- ✓ Effectively manage any unwanted events that may occur, in particular by reporting them quickly.

ABC

As part of an ISO 9001-certified system, process 1.2 ABC (Anti-Corruption and Bribery) defines the rules applicable within the company.

To further improve its ethical approach, both in anticipating and reacting to unwanted situations in this area, Phoebe has: Mapped its risks of corruption and bribery and keeps this map up to date.

- Drawing up a code of conduct signed by each employee.
- Drawing up a code of conduct for subcontractors, who are stakeholders in our operational processes.
- We have signed up to the UN Global Compact and publish our Communication on Progress every year.

The elements implemented and maintained must enable PHOEBE to :

- ✓ Promote and demonstrate your commitment to respecting the rules.
- ✓ Helping our employees and stakeholders to understand the issues involved in fighting corruption.
- ✓ Fight against all types of corruption and bribery.
- ✓ Effectively manage any unwanted events that may occur, in particular by reporting them quickly.

In order to be as transparent as possible on this subject, the company publishes an annual Ethics Report which includes the following indicators:

- ❖ The number of employees who have signed the Code of Ethics
- ❖ Number of exposed employees* made aware of corruption
- ❖ The number of non-exposed employees made aware of corruption
- ❖ The number of internal or external ethics-related reports
- ❖ Ecovadis score on Ethics
- ❖ The number of data breaches identified

* employees at risk are managers, sales staff, employees working abroad and employees who place orders

Our ambition: to contribute to Objective 16 of the UN's Sustainable Development Goals



RESPONSIBLE PURCHASING

Purchasing is essential to our operations, whether for internal needs or to help satisfy our customers through sales or service provision.

PHOEBE buys products and services. For each purchase, the following questions are asked:

- Do I really need to buy, to buy only what is necessary?
- Can I encourage responsible purchasing? In other words, one that seeks to optimise cost, environmental impact and societal impact, in order to strike the best balance.
- Once I've decided to make a purchase, can I optimise the delivery or service process to reduce the environmental impact?

The elements implemented and maintained must enable PHOEBE to :

- ✓ Use purchasing as a lever to reinforce its CSR actions;
- ✓ To use our purchases, particularly of services, to encourage our partners to adopt our CSR approach.

To measure the progress made, the company will draw up a purchasing review based on the following indicators:

- ❖ The number of service providers who have signed our code of conduct (which includes ethical, social and environmental aspects)
- ❖ The percentage of service providers who have followed the due-diligence process
- ❖ The percentage of products purchased that are recycled, reused or considered environmentally friendly
- ❖ The volume of products or services purchased from social economy organisations.

Our ambition: to contribute to objectives 8, 9 and 12 of the UN Sustainable Development Goals



MANAGEMENT COMMITMENT

Management undertakes to :

- ✓ Ensuring the integrity of every employee, not only in France but also in the UK and Dubai.
- ✓ To ensure that an integrated management system is implemented in accordance with the requirements of ISO 9001, 14001, 45001 and 27001, to enforce compliance with its provisions and to periodically assess the progress made in order to continuously improve the effectiveness of the management system,
- ✓ Ensuring that the resources needed to achieve the expected results are actually deployed,
- ✓ Unite our teams around the continuous improvement of our activities and the reduction of our environmental impact,
- ✓ Implement actions to reduce digital risks.

So by working together with the same vision, we'll be helping to improve quality and demonstrating our skills and expertise to our customers.

The Integrated Management System (Quality, Safety and Environment, IS) covers all Phoebe's services.

- Telecom Engineering BU
Services consist of the installation of equipment selected and supplied by the customer. All installation and/or test instructions (locations, cabling, marking, etc.) are provided by the customer for PHOEBE ILE DE France and PHOEBE Telecoms Limited.
- Industrial Engineering BU
Consulting services and the provision of skills. Design activities are the responsibility of our customers.
- IT Solutions BU
Sales of customised and non-customised products, sourcing and qualification of hardware
- The Training activity can be carried out by all the BUs - Preparing, running and evaluating inter- or intra-company training sessions.

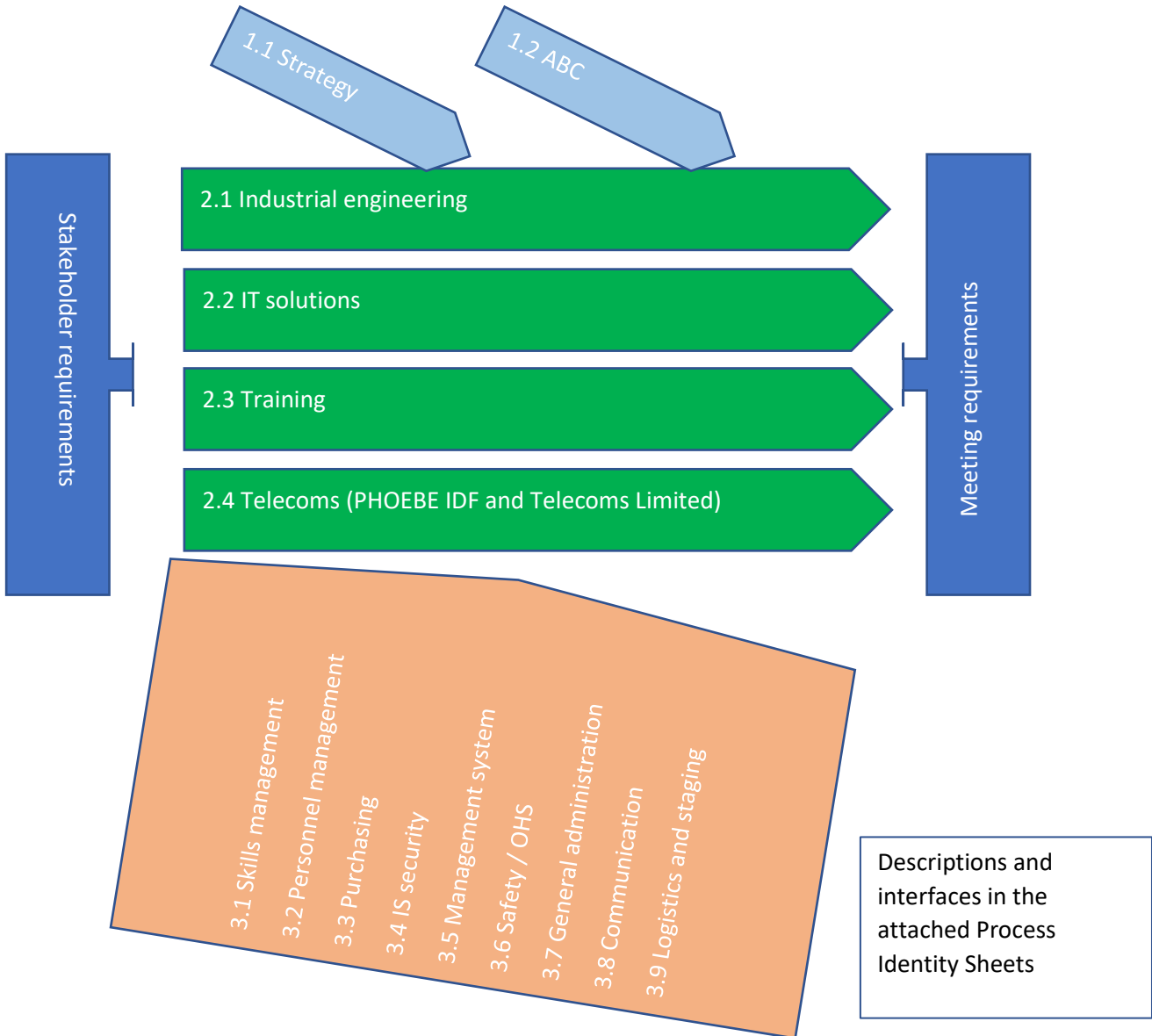
Our training services are Qualiopi certified.

Les Ulis, 7 May 2024

Pascal HELIE
Managing Director



PROCESS MAPPING



Interactions with processes :

- The management process (1.1: strategy) defines the policy and management system for the other processes.
- The support processes (3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8 and 3.9) support the operational processes.

Process	Internal or external issues	ISO 9001/ 14001/45001
1.1 : Strategy	Define and evaluate company, HR and quality policies	4,1 5,1/ 5,2/5,37.19.3
1.2 : ABC (Anti-Bribery & Corruption)	Ensuring compliance with ABC rules and anticipating risks	5.2 ; 6.1 ; 7.1
2.1: INDUSTRIAL ENGINEERING	Develop and implement actions to achieve optimal contracts Implement, monitor and evaluate projects	6.1 8.1/8.2/8.3/8.4/8.5/8.6/8.7 9.1
2.2: DISTRIbution		
2.3 : Training		
2.4: TELECOMS		
3.1: skills management	Optimising skills management	7.2
3.2: personnel management	Ensuring compliant personnel management	7.1
3.3 : Purchasing	Controlling purchasing	7.1 8.1.4(45001)
3.4: Information systems security	Managing risks and optimising information systems	6.2 7.1
3.5 : Management system	Monitor the implementation of the quality policy, implement the principle of continuous improvement and monitor it	4.2/4.3/4.4 ; 5.3/5.4 ; 6 8.2 ; 7.2/7.3/7.4/7.5 ; 9 ; 10
3.6: Safety / OHS	Ensuring compliance with Occupational Health and Safety rules	4.2/4.3/4.4 ; 6.1/5.4/6.1/6.2 7 ;8.2(14001) ; 9 ; 10
3.7: General administration	Managing the day-to-day running of the company, providing support to the various departments	7.1/7.2/7.3/7.4 8.4
3.8 : Communication	Ensuring good communication	5.2.2 ; 7.4 ; 8.2.1
3.9: Logistics and staging	Receiving, dispatching and monitoring stocks, preparing equipment	7.1 8.5