

Document title	Cellnex UK Site Access Policy		
Document Code	UK-SA-POL-0001	Version 7.0	<b>Date</b> 19-Sept-2025

# Cellnex UK Site Access & Accreditation Policy

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## 1. Introduction / Background

As a site owner, Cellnex UK recognises its duty of care to all visitors to its sites whether they be employees, customers, contractors or others. It recognises that work activities undertaken by site visitors may potentially impact Cellnex UK, site providers, neighbours and the general public outside a site boundary. It also understands that in allowing visitors to access its sites there is a risk to Cellnex UK and its customers, assets and operations.

The nature of Cellnex UK business is to provide site share facilities including the use of masts towers and rooftops as a platform from which its customers transmit RF signals. These activities are supported by equipment installation and removal, fault response and maintenance activities which are undertaken by or on behalf of Cellnex UK, its customers and their nominated contractors.

These activities may present a number of hazards to individuals accessing Cellnex UK sites and to the wider public outside its site boundaries. Cellnex UK recognises it holds the primary responsibility for putting in place controls to ensure that the risks to staff visiting site, other site visitors and the public are minimised.

#### 2. Purpose and Scope

The purpose of this document is to set out the Cellnex UK strategy for controlling and managing access to its operational sites to ensure the safety of all site visitors.

This policy applies to all Cellnex UK employees, customers, contractors and all other persons undertaking visits to Cellnex UK owned and managed sites.

## 3. Basic Principles

The following statement is intended as a high-level summary outlining the Cellnex UK position for this policy:

#### Aims:

- To ensure the safety of all persons accessing Cellnex UK or Cellnex UK managed sites.
- To provide a structured system of control for access to minimise the risk of injury to persons by limiting access to those who are competent.
- To provide a process by which all visitors to Cellnex UK sites can be advised of all known permanent and temporary hazards present on site.
- To set out the processes to be followed which will ensure that all competent and legitimate visitors to Cellnex UK sites can obtain safe access with minimal delay.
- To provide a single point of reference for all persons wishing to access Cellnex UK sites.

Cellnex UK is committed to ensuring that risks: to its neighbours and the wider public; to both Cellnex UK employees and its customers; to assets and operations, are controlled as far as is reasonably practical.



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To meet our commitments, we will apply the following principles:

- Take all realistic steps to process accurate and reasonable site access requests in line with customer contractual Service Levels.
- Protect the environment through the employment of considerate working methods.
- Set clear standards for persons accessing and attending site and measuring subsequent compliance.
- Work closely with site providers to maintain a productive and harmonious relationships.
- Assess visitor competence and provide accreditation to ensure they can safely complete the tasks they intend to undertake on site.
- Provide attendance/supervision at sites with significant hazards which cannot be reasonably mitigated by other means.
- De-conflict site activities to ensure a safe working environment.
- Document residual hazards and make them available via the Site Access Request Portal.
- Manage policy breaches to understand and take the actions necessary to prevent reoccurrence.

Cellnex UK actively promotes continual improvement by:

- Continuous review of its policies, processes, rules, procedures and systems; identifying
  areas of potential improvement and putting in place changes to implement those
  improvements.
- Actively seeking alternative, more effective and efficient methods by which it can reduce risk to site visitors.
- Implementing periodic audits that ensure breaches of access arrangements are identified, subsequently investigated and where necessary, further steps taken to ensure compliance in the future.

## 4. Site Access Policy

# 4.1. Summary

- All site visitors must be pre-accredited through the Cellnex UK Accreditation processes.
- Cellnex UK will make reasonable endeavours to provide timely approval of a site access request for its customers and their approved contractors.
- All visits to all Cellnex UK sites must be supported by an approved access request from the Site Access Request Portal.
- All access must be undertaken in accordance with the access provisions for the site.



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- Cellnex UK will manage the timely resolution of any site access issues which prevent an accredited company or persons with an approved access request to access site.
- Any works undertaken on site must be in accordance with the relevant customer agreement and approved access request.
- All site visits are to be planned to take account of the published residual hazards for the site.
- All site visits for structures and rooftops are to be carried out in accordance with <u>UK-SHE-POL-0003 Climbing & Working at Height.</u>
- All potentially overlapping site activities will be identified, and risks mitigated.
- Cellnex UK will provide site attendance to oversee higher risk site visits or operations.
- All site visitors will ensure that the site environment and relationships with neighbours and local site providers are protected.
- All work undertaken on Cellnex UK sites or Managed sites will be undertaken against <u>UK-SHE-POL-0003 Climbing & Working at Height.</u>
- Any accidents, incidents, near misses or unsafe conditions at site must be reported to Cellnex UK at the earliest opportunity via the <u>UK Service Desk Portal</u>.
- All visits to Cellnex UK portfolio sites must be taken in accordance with the access rules that apply to those specific portfolios.
- Non-compliance with the above will be dealt with using the Site Access Breach Management Process.

#### 5. Accreditation Process

#### 5.1. Overview

The Access Accreditation process ensures, as far as is reasonably practicable, that visitors to Cellnex UK sites hold appropriate training and can demonstrate that they understand and can implement Cellnex UK access requirements. Entry to Cellnex UK sites is permitted by preaccreditation of companies and all individuals who require access.

In order to achieve this, Cellnex UK requires both companies and individuals to become accredited through the Access Accreditation process prior booking access via the Site Access Request Portal. Different levels of assessment are required dependent on the work types to be undertaken, for example, ground or structural based work and/or the site type to be visited. In addition, further accreditation such as security vetting will be needed if access is required to certain portfolio types, for example MOD or Police sites.

#### **Access Accreditation Process:**

The process is operated by a two-tier system:

- Companies
- Individuals



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It is mandatory for all persons requiring access to a site to complete the online Site Access Induction Course to ensure that they are familiar with Cellnex UK regulations for accessing sites and the importance of having safe access to sites.

Accreditation in both tiers will be valid for a period of two years and individual accreditation will only be possible for direct employees of accredited companies. Site activity is defined as one of the below:

Access Level	Description of activity		
Heights/Structural work/Rooftop	Any activity which involves the climbing of a mast, tower, stub tower or climbable pole on a roof, a pylon or any similar structure. Or any activity which involves work on a rooftop.		
	An activity which involves working inside the Site Sharer's equipment building/cabin.		
Compound	Or any activity which involves working outside of a building without working at height. e.g. grass cutting, trenching, fence repairs, etc.		
	Or any activity which involves taking special equipment to site e.g. MEWP, Crane, Cherry Picker, etc		
	Please do not use, unless you are undertaking drone activities.		
Whole Site	Please note this will block the site completely and companies that are working in conjunction with you will not be able to submit access requests.		

Each accredited company, and its employees, must be accredited to the appropriate level for the work they wish to carry out. All persons visiting site must be registered by the accredited company and Cellnex UK's induction process must be completed by the individual(s) working on site.

#### **5.2.** Accreditation Process for Companies

A company wishing to either apply to Cellnex UK for, or in order to renew its, accreditation to become an approved access company will need to fully complete the relevant application forms, available via the Cellnex <u>UK Service Desk Portal</u> in their Limited Company name as documented on Companies House. A fee will be charged for this accreditation by Cellnex UK and a Purchase Order must be supplied with the completed application form. Please refer to Appendix A for Accreditation charges. Cellnex UK will then review and assess the information provided, along with any history of activity where a previously accredited access company is applying for reaccreditation. Company Accreditation fees may be waived, if the applicant company carries out more than 50% of their works on behalf Cellnex UK.



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Following successful assessment by Cellnex UK, a two-year accreditation to the company shall be granted. At this point Cellnex UK will request details of persons who require an Site Access Request Portal login. This will allow the company to submit requests for access through the Site Access Request Portal. Logins are issued per individual and are not permitted to be shared. Any breaches in the use of logins will be investigated in line with the Site Access Breach Management Process and may result in a termination of their profile.

If a company ceases trading or is liquidated, it is their responsibility to inform Cellnex immediately of this change, Cellnex will then make the appropriate system changes to ensure continuity of service and/or remove accounts. This also includes companies changing their Limited Company name as documented on Companies House.

#### 5.3. Accreditation Process for Individuals

All individuals who require access to Cellnex UK sites must directly work for a company accredited by Cellnex UK. Individual engineer accreditation must also be obtained from Cellnex UK. The engineer accreditation application forms must be completed on line and the supporting information required provided.

If only ground access is required no fee is applicable, should access be required for the individual at any height, i.e. rooftop or structure applications, then fees will apply and a Purchase Order document must be provided. Please refer to Appendix A – Accreditation and Site Access Fees. Please note, access to rooftops, satellite dishes or structures for engineers under between the age of 18 and 21 will be subject to additional approval, engineers between the age of 16 and 17 are not permitted to access rooftops, satellite dishes or structures. Once accredited, all registered individuals are required to complete the Site Access Induction course. The accreditation of individuals will be valid for two years and must be renewed if access is still required.

Individual Accreditation fees may be waived, if the applicant works for a company that carries out more than 50% of their works on Cellnex UK sites on behalf Cellnex UK.

If a mandatory certificate of competence expires within the two-year accreditation period, in order to ensure accreditation continues and individual remains active on the Site Access Request Portal, evidence of re-certification must be supplied to Cellnex UK. Please refer to the Cellnex UK website under the code of practice for a list of accepted training providers. For certain site activities for example; abseiling, additional evidence of competency must be supplied to Cellnex UK

Please note, an individual may only be accredited to one company at any one time.

Please visit the UK Service Desk Portal for the relevant application forms.



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# 5.4. Merger/Amalgamation of Companies or Transfer to Employees from Two Accredited Companies

In the event of companies merging or employees being transferred from one accredited company to another, Cellnex UK shall require written confirmation from both companies, detailing the required transfers and effective date. The individual accreditation fees are transferable for the duration of the accreditation period remaining. A new Purchase Order document for the accreditation fee would need to be supplied from the new company when renewing accreditation. Cellnex UK does not accept third party Purchase Order documents.

Please note, previously booked access requests will not be visible once the individuals and Site Access Request Portal log ins have been moved over to the new company.

#### 5.5. Use of Temporary Resource/Agency Employees

Cellnex UK recognises the requirement for temporary resource to be used from time to time. Cellnex UK will permit an accredited company to use temporary employees providing the below conditions are satisfied:

- The accredited company assumes responsibility for the induction of the individual and ensuring they work in accordance with their company policies and procedures.
- The accredited company provides all relevant PPE such as RF monitors.
- The temporary resource must become accredited to Cellnex and will be subject to the standard technician accreditation fee (if applicable).

Should an accredited company wish to use the resource of another accredited company or agency the company supplying the temporary resource must provide evidence in writing to the Accreditation team including the names of resource being temporarily being transferred and the duration of the transfer. Engineers being temporarily transferred must be accredited to the level in which they are required by their parent company and this will be transferred over. Transfers can be made for a maximum of 3 months.

On managed site portfolios there may be circumstances in which employees of the portfolio owner require access into the Cellnex UK managed demise. This eventuality will be managed on a case-by-case basis. The granting of access for non-accredited persons will be approved on a case-by-case basis by Cellnex UK through the submission of a one off access request, approval can be provided by the Cellnex Site Access Management or Cellnex SHE Management.

#### 5.6. One Off Access Request Process

Cellnex UK recognises that there may be occasions where a company may be required to attend a site as a one-off visit only and therefore it is not practical to undergo the accreditation process.

For example, where a MEWP or scaffolding company is required to attend site, Cellnex UK appreciates that these companies may be sourced locally or on an ad-hoc basis and therefore accreditation is not practical. A one-off access request must be completed giving a minimum of 5 days' notice and the company instructing this activity must be sufficiently accredited and will



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act as sponsor, they will be required to arrange the access and take ultimate responsibility for the subcontractor company being used. RAMS must be supplied and site attendance/supervision may be required under the site access provisions.

Please note that each supplier is entitled to five One Off Access Request before they will be compelled to complete the accreditation process. Alternatively, any one off access request above the five is chargeable as per Appendix A as well as any supervision/site fees that may be applicable.

To submit a one off one-off access request, please use UK Service Desk Portal.

#### 5.7. Accreditation Renewal Process

Notification will be sent to the company's nominated main point of contact three months prior of expiry date of the company's accreditation. This will be followed up with reminders sent two and then one month(s) prior to the accreditation expiry date.

If the renewal process has started when the expiry date is reached, then the accreditation will continue uninterrupted until the renewal has been completed.

Should the company accreditation not be renewed before the expiry date be met and no submission is made to renew, then the company will be suspended from the Site Access Request Portal. Future access requests will not be able to be booked, and any access requests post the company accreditation expiry will be cancelled.

All requests to become re-accredited must be accompanied by all documentation required. If there are any errors in the documentation, then new documentation must be submitted within 30 days of submission of the initial request. Please note, if the correct documentation is not supplied within the time frame stated then the request will be cancelled and a new request must be raised, this may result in a temporary suspension from the Site Access Request Portal.

#### 6. Site Access

#### **6.1. Site Access Requests**

All site access requests must be submitted through the Cellnex Site Access Request Portal. Access to site is not authorised without an approved access request within the portal in the name of the person(s) and company undertaking the works on site, this must be available on site via the person(s) accessing site as either a hard or soft copy.

Access to a Cellnex UK site without an approved access request will be deemed as unauthorised access and a breach of this policy. Cellnex UK will investigate any instances of unauthorised access, if an accredited company is found to be taking access without a valid approved access request, then Cellnex UK will take action in line with the Site Access Breach Management Process, which may include revoking accreditation.



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Access to site is permitted solely for the purpose detailed in the job description on the approved access request, no other works are to be undertaken on site. Any works undertaken on site not detailed in the approved access request will be deemed as a breach of the approved access request and will be investigated by Cellnex UK and action taken in line with the Site Access Breach Management Process.

Cellnex endeavours to hold current access arrangements for each site within the Site Access Request Portal, however these details are set at a point in time, Cellnex is not responsible for alterations to site circumstances that temporarily impede access nor does it offer compensation in these instances. Cellnex will work with Site Providers as quickly as possible to re-enable site access, but a same day resolution may not be achievable.

## 6.2. Providing Timely Access

Cellnex UK access process and portal is designed to ensure that an access request can be reviewed, and authorisation can be issued to a requester with minimal delay. The Site Access Request Portal differentiates between fault response and routine planned visits, Cellnex UK ensures that priority is given to the processing of fault response site access requests. All requests for access must be made via the Site Access Request Portal by the accredited company requesting the access and attending site. Each company must have an access request in their own name, if working in conjunction with another supplier, the secondary access requests must refer to the Principal Contractor access request ID.

Cellnex UK does not offer compensation for access requests that are not approved for the time/date requested, it is the responsibility of the requester to work within their own abort windows and re-arrange requests where approval has not been possible.

All access requests will be approved according to the access provisions detailed in the site lease agreement and Site Access Request Portal, all access requests must be submitted in accordance with these provisions. It should be recognised that sites have varying access restrictions e.g. site opening hours, safety restrictions, site attendance requirements, notice period requirements, access cost and that approving access for these sites may take longer due to adherence to these access provisions.

For non-fault work, a minimum of 7 days' notice plus any Advanced Notice Period required by the site provider listed in the Site Access Request Portal, should be allowed for application processing time, the start date of the access request should not be before this timescale.

The Site Access Request Portal prevents block bookings of sites for more than 5 days concurrently. Multiple site access requests should be submitted if longer periods of site access are required. All access requests for longer periods of time must include the references to each other (access request IDs).

This policy recognises that, at times, access to some sites may be restricted for extended periods due to maintenance requirements or major re-engineering works being undertaken. During these extended periods the access control of certain sites may be novated to Cellnex's delivery



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partners. Cellnex UK will take all reasonable steps to negotiate access, particularly for customers with services affecting faults, during the restricted period. If not successful and the Requester believes that access is being unreasonably denied, then the matter can be escalated following the escalation process set out in Appendix B.

#### 6.3. Cellnex UK Access Team Operating Hours

Cellnex UK operates a Site Access team responsible for processing access requests through the Site Access Request Portal.

The working hours of this team are Monday to Friday 07:00 - 18:00, outside of these hours Cellnex UK provides an on-call phone escalation service providing assistance for emergency fault site access requests only.

#### 6.4. Site Access Provisions

Site access must only be taken in accordance with the access provisions detailed on the approved site access request, following the designated access route and following the site access instructions. All visitors are expected to take a common-sense approach to changing conditions at site e.g. weather, seasonal crops or moving of livestock. Visitors should use the <a href="UK Service">UK Service</a> <a href="Desk Portal">Desk Portal</a> to provide feedback about issues related to a site or a visit.

An Accredited Company must only complete works on site that are detailed in the job description of the approved access request and within the date and timings on the Site Access Portal. Any deviation from the activities stated in your job description may be considered as a Breach and will be managed as per section 8 of this Policy, Breach Management Process.

Cellnex UK classifies each site according to the site lease provisions and access characteristics for ground standard (e.g. no major works are taking place, no special equipment is selected and no height access) access, these categories are referred to as Site Banding. The Site Banding can vary from time to time, depending on site characteristics and access procedures. Cellnex will ensure that the Site Banding given either improves upon or aligns to the lease provisions for ground access.

#### Site Bandings:

Ground Access Banding	Banding Definition	Access Provision
А	No notification required to the Site Provider, site access request will automatically approve.	24/7
В	One way notification required to the Site Provider, on an FYI basis.	24/7



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С	Two way communications and approval required from the Site Provider.	24/7
D	Two way communications and approval required from the Site Provider.	Non-24/7

Cellnex UK will investigate any instances of access taken at site outside of the access provisions detailed on the Site Access Information form (SAF). If an accredited company is found to be taking access to sites without following the access provisions set out on the approved access request, then Cellnex UK will take action in line with the Site Access Breach Management Process, which may include revoking accreditation.

Access keys or cards provided by the Cellnex UK Accreditation Team must be kept safe and secure at all times and returned within the relevant requested time scales. Keys and access cards must only be used by the person to whom they have been issued, tailgating is not permitted. If it is identified that an individual is misusing an access or key card then Cellnex reserves the right to disable the card/key and/or request it is returned.

OBASS cards must be used in accordance with BT's Terms and Conditions, including only being used by the person to whom the card is registered, also ensuring the PIN number is kept confidential. All engineers accessing a BT site should hold their own OBASS card, tailgating is not permitted.

Where non-Cellnex UK locks are fitted, it is the responsibility of the visitors on site to ensure that they do not impede other users, and that where required, padlocks are fitted in a way to allow all locks to be opened. Visitors to site are not permitted to change any locks on site, unless a cabin lock owned by a customer. Fences, anti-climbs and gates must not be climbed over or removed under any circumstances. Site keys can be requested via the Accreditation team, notice periods are required to allow for keys to be sent prior to an approved site access request.

Sites are secured with a variety of locks, Cellnex UK are undertaking a programme to switch out manual combination locks with smart iLOQs. Persons accessing Cellnex sites must be registered for iLOQ ahead of the start time and date of the access request.

Please note that cabin locks are not the responsibility of Cellnex UK. Where equipment is located within a shared room, on completion of the installation project, keys will have been issued to the Cellnex customer to facilitate cabin access. Any replacement keys and/or replacement locks will be issued or installed at the customer's cost on a case-by-case basis.

CCTV is operated on some of Cellnex UK sites, the CCTV operator will check that there is an approved site access request in place. Please follow the access guidance to contact the CCTV Operator or acknowledge the CCTV operator if challenged via the site public address system and/or follow the access conditions for the site and call the CCTV company to alert them to your presence on site.



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#### 6.5. Site Access Issue Resolution and Temporary Access Restrictions (TARs)

Cellnex UK will endeavour to work with the site provider, landlord, portfolio owner and/or agent to resolve site access issues preventing an accredited company or persons carrying out works in accordance with an approved access request.

If there is an issue that affects engineers' ability to access site or to include or has Health, Safety or Environmental implications then a Temporary Access Restriction (TAR) will be placed on the site whilst Cellnex resolves the problem.

TARs may be restrictive, partial or total. A restrictive TAR provides temporary site guidance. A partial TAR will allow ground-based access. A total TAR will prevent all site access. The Site Access Request Portal will automatically refuse any requests on sites that have a full TAR in place. Requesters are able to view the details of the TAR via the Site Access Request Portal. If required the Requester may contact Cellnex via the <a href="UK Service Desk Portal">UK Service Desk Portal</a> for an update on scheduled resolution works that will lead to the TAR being lifted if they urgently require access to the site.

## 6.6. Site Share Agreements

Cellnex UK will provide authorisation to access site in accordance with the relevant access provisions in the lease. Prior to accessing a site, it is the responsibility of the site sharer or the requesting company to ensure that Cellnex UK has confirmed any relevant third-party consents have been obtained and the sharer will ensure it has the necessary rights and/or consent from Cellnex UK under the relevant Site Share Agreement before carrying out any works on site. An approved access request does not provide confirmation that the proposed works are permitted under the relevant Site Share Agreement.

For project works the Cellnex UK Project Team undertaking the works will ensure that consent has been granted by the Site Provider to undertake the works prior to the submission of an access request to deliver the project. This is especially relevant for intrusive work that may impact the site provider's business or use of the property or where special equipment is required at site to deliver the project.

Anyone accessing a site shall not carry out any unauthorised works or otherwise tamper with or cause any damage to any Site or Mast or Other Sharer's equipment, this includes but is not limited to:

- Physically disrupt, interrupt or interfere with the emissions of any other sharer.
- Permit any act at any Site which causes or is reasonably likely to cause any nuisance, annoyance, disruption, loss or damage to the Cellnex UK, Other Sharers and any Landowner or Owner or Occupier of any property adjoining or nearby.

#### **6.7. Project Planned Works**

Where works are part of a Cellnex UK project, it is the responsibility of the project and supplier to discuss the scope of works with the Site Provider as per UK-SM-GUI-0023: Rights Acquisition



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Guide available in Engage. The Site Access team will agree the on-site dates from the detail provided on the site access request but Site Access is not responsible for agreeing the schedule of works, explaining the extent of intrusive works, discussing use of special equipment, road/car park closures or required consents etc. These details should be confirmed by the project during the access phase and the request for site access only provides official confirmation that Cellnex UK consents to the requestors being on site.

#### 6.8. Customer Self-Install/Build

Should access be required to undertake a Self-Build or Self-Install project, then all parties involved in such a project should adhere to the Cellnex Self-Install and Self-Build Standard.

#### 6.9. Published Residual Site Hazards

Cellnex UK will collate information relating to residual hazards that exist on its sites, these will be listed in the approved access request Risk Register. Cellnex UK encourages all site visitors whilst on site to note and pass back to Cellnex UK any additional residual hazards that they encounter. All urgent hazards should be escalated following Appendix B, all non-urgent hazards this should be reported by completing a post works report via the <a href="UK Service Desk Portal">UK Service Desk Portal</a>. The Site Access Request Portal is the central repository for residual risks and hazards and will be updated as new information is provided.

All visitors to Cellnex UK sites are required to ensure that the Residual Risk information provided with the approved access request is used in the detailed planning of the work to be undertaken on site.

For site access requiring site attendance, the representative will hold a site safety meeting before the work starts, this will record the condition of the site and all relevant safety matters that have been discussed and agreed.

Risk Assessments and Method Statements (RAMS) may be requested and site attendance may be required as part of the access request process if required by the site access provisions or if a special activity is due to be undertaken on site.

#### Special activities include:

- lifting and lowering of dishes which have a diameter of 1.2 metres or more
- use of derricks
- use of a crane
- use of a helicopter for installation activities
- use of an erection and man riding winch
- use of a capstan winch
- use of a drone
- excavations at a managed portfolio
- hot works on structures
- installation of generators (whether temporary or permanent)



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- removal of a structural member
- electrical works which impact distribution boards or circuits owned by the Site Provider
- installation of scaffolding at a site

If site attendance is required, an applicable a Purchase Order will also be requested to cover the Site Attendance fees. The release of the approved access request may become delayed if RAMS are incomplete/unsatisfactory or not submitted in a timely manner and/or a Purchase Order is attached that is not in the name of the requesting company. Cellnex UK may supply these documents to a Site Provider or Landlord. RAMS documents must be made available on site by the accredited access company/persons for a site inspection by the site attendance.

## 6.10. Structures and Rooftops Visits

All site visits for structures and rooftops are to be carried out in accordance with UK-SHE-POL-0003 Climbing & Working at Height. For further information refer to the <u>Cellnex UK website</u> under Code of Practice.

#### 6.11. Outages

Please note that requests for planned activities should be submitted with a minimum of 48 hours processing time in addition to the following notice periods for outages:

- Sites with Broadcast equipment require a minimum of 17 days.
- Sites with Mobile Network Operators equipment require a minimum of 18 days.
- Sites with other Operators equipment require a minimum of 10 days.

For emergency access requests shorter notice periods may be negotiated at the Broadcast and Mobile Operator's discretion. It is the responsibility of the requester to identify the required outages for the works in which they are undertaking at site, outages must be requested via the site access request at point of submission.

## 6.12. Identifying and Mitigating Overlapping Site Activity Risks

Often, due to the nature of the work carried out with respect to installation, maintenance and fault response, the coincidence of activities being undertaken by different parties at the same site may present significant hazards. It may not be practical for Cellnex UK to permit more than one party to undertake work at a site, simultaneously. Cellnex UK will review overlapping access requests and attempt to deconflict, if the activity is low risk Cellnex UK may allow multiple activities to be undertaken at the same time on the same site by different accredited access companies ensuring all parties are informed in advance. Where one or more of the activities are higher risk, it may be possible for the overlapping activities to proceed, as long as all parties on site work together to mitigate risks and ensure works are delivered safely. The first company on site is deemed as responsible for coordinating and cooperating with subsequent parties.



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Overlapping activities are often required due to access requests for urgent fault works, Cellnex UK will, to the best of its abilities, coordinate the access requests to ensure that higher priority works are able to proceed as requested through the Site Access Request Portal.

Cellnex UK will provide an online site diary for each site, visible to all accredited companies when requesting site access through the Site Access Request Portal.

If persons are encountered on site unexpectedly then the escalation process as detailed in Appendix B must be enacted immediately.

## 6.13. Site Attendance - Higher Risk Site Visits or Operations

The majority of access to Cellnex UK sites can go ahead without requiring site attendance, however Cellnex UK requires site attendance if the planned site works present significant risk or if the site access provisions stipulate it.

To manage an elevated level of risk, access will be provided in the form of site attendance by a competent person, this ensures that Cellnex UK mitigates the risk to persons on site during the access period.

Where a site requires attendance a minimum of 10 days' notice is required when submitting your site access request.

Cellnex UK may require site attendance and/or RAMS for the following activities:

- Managed portfolios
- High levels of Radio Frequency (RF) present (red structures) and/or sites where antenna shutdowns or reduced power is required
- MF sites
- Power lifting
- Use of cranes
- Use of MEWPs
- Use of Drones
- Lifting large items (including dishes of 1.2m or greater)
- Use of derrick, winch or hoist
- Site activities requiring man riding
- Lifting by Derrick or Helicopter
- Self-installation of Antennas, Feeders and Ancillary Equipment
- Unaccredited companies
- Priority broadcast transmitters and the link sites which feed them
- Other hazards or abnormalities
- Community relations issues
- Site type and site provider requirements
- Site security
- Excavation on all Medium Frequency (MF) and Platinum classified sites, or where deemed necessary by Cellnex UK



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- Hot works
- Structure painting
- Generator deployment and refuelling
- Pedestrian traffic management

In addition, site attendance can be requested via the access request process for reasons such as not holding keys or security clearance.

#### 6.14. Site Attendance Purchase Orders

Site attendance shall be charged to the accredited company requesting access and a valid Purchase Order must be supplied in order for the site attendance to be booked, site attendance charges are listed in Appendix A. The method of invoicing will be agreed between Cellnex UK and the accredited access company through the accreditation process.

Cellnex UK do not accept third party Purchase Orders, the Purchase Order supplied must be in the name of the Accredited Company requesting the access. A Purchase Order document must be attached to the access request and the Purchase Order number must match the number supplied into the POID field.

An approved access request requiring site attendance can be cancelled by the requesting company without incurring a charge, provided that one clear working days' notice is given between cancellation and commencement of the access request. If the cancellation of an approved access request is made by the requesting company with less than one clear working days' notice then the site attendance charges will still apply. If the approved access request is cancelled due to inclement weather or other safety concern outside of Cellnex UK control, any site attendance fees will be charged in full.

Where the works are related to a Cellnex UK project, the Cellnex project number must be added to the access request alongside a dispensation letter from the Delivery Manager agreeing the supervision re-charge to the project. If this is not completed, then the Accredited company requesting the access will be liable for any site attendance charges.

Where the works are related to a Cellnex UK activity and supplier e.g. maintenance activities or structural projects the supplier will be issued with a dispensation letter at the beginning of each year, this must be attached in lieu of a Purchase Order document.

## 6.15. Environment, Neighbours and Local Site Providers

Cellnex UK is fully committed to maintaining good relations with its site portfolio owners, site owners, landlords and neighbours. In order to ensure continued good relations, all visitors are required to plan their visit, ensuring that it can be undertaken without causing unreasonable disturbance, damage or nuisance caused, including but not limited to:

 Straying from prescribed access routes, blocking access, speeding or driving discourteously.



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- Physical damage or degradation to land either on the permitted access route or not.
- Littering, failing to remove materials, cable drums and packaging.
- Shouting and the use of offensive language.

All persons accessing a site must be sensitive at all times to local circumstances and the local environment and community. If visitors to a site are approached by neighbouring residents with complaints, then dependent on the circumstances, they are to invoke the escalation process as detailed in Appendix B or if non-urgent, complete the relevant section on the Report Facilities Issue page via the <a href="UK Service Desk Portal">UK Service Desk Portal</a>. Sites must only be accessed for the purpose detailed in the approved access request.

It is the responsibility of the persons attending site to ensure that no damage is caused to the site or neighbouring area. Any minor damage found on site must be reported via the Report Facilities Issue in the <u>UK Service Desk Portal</u>, and photographs supplied where possible. Major damage, such as missing gates/fences must be reported as soon as possible using the <u>UK Service Desk Portal</u>.

Any minor damage found on site must be reported via the Issue and Incident reporting on the <u>UK Service Desk Portal</u>. It is the responsibility of the accredited company to rectify or reimburse the portfolio owner, site provider, landlord or neighbour for the damage via Cellnex UK processes. Cellnex UK advise that in the event that damage is caused at site, the attending persons should create an accurate record of the damage, including pictures or video where possible.

#### 6.16. Works at Cellnex UK sites or Managed sites

All works at Cellnex UK or Managed sites shall be undertaken in-line with UK-SHE-POL-0003 Climbing & Working at Height. For further information, refer to the <u>Cellnex UK website under the Code of Practice</u>.

#### 6.17. Accidents, Incidents and Near Misses

Any accidents or serious incidents on site must be reported to the Cellnex SHE Team at the earliest opportunity. All work must stop until Cellnex UK have made any necessary enquiries and are satisfied that it is safe for the work to continue. Any accidents, incidents or near misses must be reported to using the Cellnex Operational Escalation Procedure in Appendix B.

Should any environmental hazards be found or suspected on site, then work must cease immediately and if requested by Cellnex UK, the site vacated. A Near Miss must be raised following the process set out as above and Site Access must be informed immediately to ensure that any further access can be restricted until the issue has been investigated and resolved.

Any damage to fencing, buildings, or the structure, any evidence of trespass or theft at site must be reported to Cellnex UK as a Near Miss following the process set out above. All visitors must ensure that they do not facilitate access to the site for any other individual either intentionally or by accident, and that the site is kept secure during and upon completion of all works. If any



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part of the site cannot be locked and secured, the Site Access Team must be informed before leaving the site, visitors may be required to remain on site until the site is secured.

## 6.18. Strategic Sites – Specific Portfolio Rules

The Cellnex UK site portfolio is large and varied. Significant elements comprise sites owned by landlords with whom Cellnex UK has valued strategic relationships. Often, the core operations undertaken by landlords are not broadcasting or communications. Those landlord operations present residual hazards to site visitors over and above those related to dedicated communications sites. Cellnex UK has committed to work with those landlords to put in place safeguards and processes to ensure that access restrictions to those sites are minimised for mutual benefit.

As part of its undertakings with its strategic landlords, Cellnex UK is responsible for providing an approved access request via the Site Access Request Portal to be used by or on behalf of Cellnex UK or its customers.

Cellnex UK will work with Site Providers through its Portfolio Management team to ensure that in each case it agrees a procedure with the landlord for the granting of individual site access authorisations. This will also include details of the competences required by both individuals and companies requiring access and the definition of documentation to be presented to the landlord for approval, prior to the access commencing.

#### 7. Site Access Electrical Categories

The below electrical categories are to be used on access requests requiring electrical works:

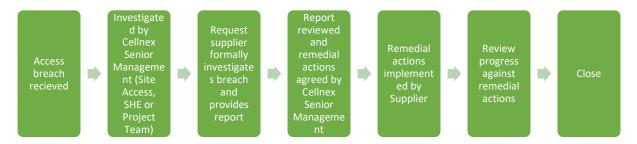
- Category CE1: Electrical Designer Electrical system design and specification for technical & domestic installation.
- Category CE2: Low Voltage Electrical Installation and Decommissioning.
- Category CE3: Electrical and Electromechanical Maintenance Examples AC, lift, HVAC etc.
- Category CE4: High Voltage AC Electrical Installation and Maintenance.



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## 8. Breach Management Process

Any breaches of this policy will be managed via the below process:



All breach(es) will be investigated by a Cellnex Senior Manager. Any access related near miss or accidents will be investigated in conjunction with the Cellnex UK SHE team and managed in accordance with UK-SHE-PRO-0026 SHE Event Management Procedure.

Breaches may be brought to Cellnex UK's attention by way of public or landlord, other visitors on site, comments via Post Work Report and internal Cellnex Teams e.g. Finance.

The Accredited Company will be asked to investigate the breach and provide remedial actions to ensure the breach does not occur again. Where a breach relates to non-payment of access and accreditation fees that are 30 days overdue based on Cellnex's payment terms, Cellnex will notify the Accredited Company to request that payment is made within 14 days. If payment is not received within 14 days, Cellnex reserves the right revoke Accreditation status.

Any Accredited Company responsible for persistent breaches of the site access policy will be invited to a Breach Hearing to discuss the matter as per the below process. The Accredited Company will be responsible for implementing mitigating actions to ensure further breaches do not occur.



Depending on the severity of the breach or in the case of persistent breaches relating to site access or health and safety concerns, Cellnex UK may put in place requirements for additional supervision at the cost of the Accredited Company. The ultimate sanction shall be for a company or an individual to be permanently prohibited from accessing Cellnex sites and their Accreditation status to be permanently revoked.



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# 8.1. Example Breaches

The following is a list of example scenarios which Cellnex UK deem as a breach. This list is not exhaustive but to be used as an indication of the situations that Cellnex UK would deem to be a breach.

Severity 1	Severity 2	Severity 3
Accessing site without an approved access request	Non-payment of access or accreditation fees longer that are 30 days overdue on the required invoice payment date	Providing the incorrect Purchase Order cover or a Purchase Order addressed to a company other than Cellnex UK
Incorrectly categorising or significant omissions in the description of the work type/ work being undertaken	Improper use of site access account e.g. account/password sharing	Unintentionally leaving a gate / building open on site
Causing legitimate complaint from landlord, neighbour	Not reporting damage made to site during the undertaking of approved works e.g. damage to crops or land	Non abidance to the SAF provisions e.g. taking the incorrect vehicle or using incorrect access route
Fraudulent use of the site access system, such as attempting to carry out climbing works on a ground level permit	Use of offensive language or threatening behaviour being used on site	Persistent unnecessary site access requests or Service Desk tickets
Defecating at site	Parking or staying on site overnight	
Assisting unauthorised persons accessing site		
Persistent severity 3 breaches e.g. consistent use of incorrect Purchase Order documentation		
Fraudulent submission of engineer certification		



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Risk to life due to unsafe working practice or non- conformity to H&S policies	
Completing works or any activities on site that are outside of the job description of your approved site access request	

#### 8.2. Breach Reporting

Cellnex will review on a periodic basis the number of breaches a company / individual has incurred. And may implement the sanctions set out in this document as a result of high severity or continuous breaches to this policy.

## 8.3. Example Sanctions

- Invitation for senior representatives of the accredited company invited to Breach Hearing Access Meeting
- Implementation of agreed remedial actions
- Audit undertaken of accredited company management processes and process for adherence to the Access Policy
- Supervision of all visits for a specified period, costs to be met by the accredited company
- Temporary loss of accreditation of company and/or individuals
- Permanent removal of company and individual Accreditation

## 8.4. Appeal

If at the conclusion of a breach investigation and / or breach hearing the company of individual or company concerned believes that the matter has not been dealt with reasonably, through by this procedure, they may appeal the decision by writing to the Head of Service Assurance within 28 days of the breach outcome.

#### 9. Site Access and Accreditation Fees

Cellnex UK operate a diverse portfolio of sites, depending on the works being undertaken at site as per 6.9 the Published Residual Site Hazards site attendance may be provided to manage site specific H&S risks.

In some circumstances site attendance may be provided to facilitate access and meet the site provider access requirements e.g. attendance of site provider or site fees.



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The fees are set out in Appendix A – Accreditation and Site Access Fees and subject to an annual review and uplift in line with RPI or as otherwise reasonably required to reflect increases in the Supplier's costs, changes in the Supplier's business model or to bring Fees in line with market standard rates. Any changes to the Fees will be communicated via an update to this policy.

Cellnex UK do not accept third party Purchase Orders, the Purchase Order document supplied must be in the name of the Accredited Company requesting the access. A Purchase Order document must be attached to the access request and the Purchase Order number must match the number supplied into the POID field.

Where the works are related to a Cellnex UK project, the Cellnex project number must be completed on the access request alongside the dispensation provided by the Project Delivery Manager. If this is not completed, then the Accredited company requesting the access will be liable for any site attendance charges.

Please note that the requester company is liable for all charges incurred by their site access request or accreditation, the requester shall pay each invoice submitted to it within 30 days of the date of the invoice to the Supplier's nominated bank account. Cellnex UK reserves the right to invoice a requester for services incurred within the statutory limitation period.

For any non-payment of site access or accreditation invoices Cellnex UK will take action in line with its debt collection process, which may include passing the debt to a debt collection agency and/or statutory interest being charged. The Breach Management Process may be used as a mechanism to resolve debt, which may include revoking company accreditation.

#### 10. Measures

The effectiveness of and compliance with the Site Access Policy will be continuously assured and measured through the following activities:

- Access Breach Management
- Investigation of near misses
- Trend analysis of site access data

#### 11. Change Control

This document is controlled as part of the Cellnex UK IMS via the Engage platform which maintains history of changes / version control. Downloaded or printed copies are uncontrolled.



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## Appendix A – Accreditation and Site Access Fees

Please note that all Site Access and Accreditation fees listed below are subject to an annual review and uplift in line with RPI or as otherwise reasonably required to reflect increases in the Supplier's costs, changes in the Supplier's business model or to bring Fees in line with market standard rates. Any changes to the Fees will be communicated via an update to this policy.

Please note that all Purchase Order documents supplied must be that of the accredited company. Cellnex UK do not accept third party Purchase Order documents. Cellnex UK operate a strict 30-day payment terms.

## **Accreditation Fees**

Category	Net Fee	Renewal Period
Individual (Heights Access)	£250	24 months
Company	£1,000	24 months
One off permit above 5 requests (Requests 1-5 are non-chargeable)	£250	One off payment per request

#### **Site Access Site Attendance Fees**

Site Attendance will be provided to manage site specific H&S risks, due to the nature of the work being undertaken, or to meet some site provider access requirements e.g. attendance of site provider or site fees.

Where an access request is cancelled, any Site Attendance fee will be waived providing more than one full working days' notice has been provided.

Category	Net Fee	Period
More than 5 working days' notice	£550	Per SAR & per day
Less than 5 working days' notice	£800	Per SAR & per day
Out of hours or weekend access	£800	Per SAR & per day
Pylon Site – less than 5 working days' notice	£1,500	Per SAR
Pylon Site - More than 5 days' notice	£900	Per SAR
Pylon Site - Out of hours or weekend	£1,500	Per SAR

<sup>\*</sup> Please note all fees are subject to VAT charged at the standard rate.



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Please note that Cellnex UK operates sites that fall outside the charges listed above, these sites have their own specific rate card or site specific charges will be provided once the details of the access request have been reviewed. These sites include but are not limited to:

- BT High Tower Sites
- Network Rail Sites
- Aviemore Sites
- Specific site provider access fees



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## Appendix B

The following documents and processes can be found on the  $\underline{\text{Cellnex Code of Practice}}\ |\ \underline{\text{Cellnex}}\ |\ \underline{\text{UK}}$ 

## **Operations Escalation Processes**

- UK-SA-PRO-0011 Cellnex Operational Escalation Procedure
- UK-SA-PRO-0012 Cellnex MBNL Operational Escalation Procedure

These processes contain guidance escalation related to Site Access, Accreditation, SHE and NOC teams.

## **Site Access Request Guide**

UK-SA-GUI-0001 – Site Access Request (SAR) User Guide

The guide provides the information required to submit an access request on Cellnex's Site Access Portal (Agora).

#### **UK Service Desk Portal**

UK-SA-GUI-0004 - Jira User Guide

The UK Service Desk portal is to be used to:

- Escalate SAR requests
- Log post work reports
- Report unsafe acts, conditions, near misses, incidents & accidents
- Complete accreditation forms

Link to the portal - <u>UK Service Desk Portal</u>

## IT Service Desk (for problems logging into Site Access Request Portal)

Telephone: 0333 240075

Email: support@freestyle-ts.co.uk