

Question 1 – Infrastructure Delivery

Introduction

WHP is the largest supplier of professional, infrastructure support and deployment services to the UK telecommunications industry, having grown the company on repeat business through delivering excellent outcomes for our valued customers.

Our clients operate in a dynamic market where change is constant. Using our 30 years' experience WHP helps shape clients' understanding of the future so they can thrive in these demanding conditions. We deliver a high class professional consultancy service coupled with engineering solutions to satisfy clients' requirements. WHP has built a deep and specialist knowledge of the UK's mobile and wireless network infrastructure and has been instrumental in influencing design rollout of new technologies across the country's vertical estate. Utilising over 400 staff, we offer multi-disciplined turnkey solutions to our telco and utilities clients enabling the delivery of high quality, swift solutions.

Our core Professional Services team includes Estate Management, Acquisition, Design and Planning (Town & Country) Capability. Employing over 200 staff in these departments, we work UK wide and have experience of working in every planning authority across Scotland, including rural regions, sensitive areas and National Parks. WHP has solid experience of deploying sites in volume across Scotland and as such has developed close working relationships with all the necessary stakeholders. WHP has been the largest contributor to EE's Emergency Services Network (ESN) Project, achieving the most voluminous rollout of vertical estate in challenging rural areas in condensed timescales in the history of mobile communications.

WHP has the largest dedicated property team in the industry with average commercial property experience level of more than eleven years. To understand and maximise the opportunity presented with the New Code, WHP will provide the best advice available (We are a CTIL Tier 1 supplier for New Code Services and have been issued the largest site portfolio in MBNL's Trial incorporating New Code acquisition).

WHP has representation on the RICS Telecoms Board and the RICS Telecoms Forum Board (working with the Law Commission for the past two years). WHP has a track record of tackling the toughest commercial property challenges head on in a refreshing and constructive manner, balancing the issues of brand and the need for cost effective solutions, demonstrating that WHP are uniquely positioned to obtain the optimum outcome most frequently.

WHP's in-house skill sets are broad, offering a turnkey approach, covering all the disciplines necessary to plan, deploy, augment, upgrade, refresh, maintain and optimise a network. In addition to WHP's delivery on the Macro layer of their customer's network, WHP has extensive experience of delivering microcell solutions in both urban and rural environments. WHP also serves the utilities sector, providing services to support their telecommunications networks and microwave needs as well as shaping wireless strategy for the coming decades. Relevant projects that demonstrate our capabilities relative to the Authority's requirements are:

Case Study 1 - Emergency Services Network (ESN) Project

WHP Telecoms were awarded a contract in late 2015 by EE to provide a turnkey service (site search, site acquisition, design, build, power) to deliver mobile telecommunications sites in very remote areas, including National Parks and Designated Areas in Scotland's Highlands and Islands, to extend the reach of their mobile coverage footprint and to address coverage gaps in certain areas in preparation for the transition of Police, Fire and Ambulance communications services from Airwave to EE. Overall 385 sites have been instructed to date covering new site builds and site share upgrades (site shares comprising Maritime and Coast Guard, BT and Forestry Commission Scotland etc). The value of the project to date to WHP is in excess of [REDACTED]

WHP were initially instructed by EE in the last quarter of 2015. Since then, WHP has acquired, designed and built 172 sites in total, 155 of which have been new tower sites, 125 of which have been in Scotland, 48 of which are on Scottish Islands (in approximately 2 ½ years).

The Authority anticipates approximately 60 sites will be built as part of this programme between June 2018 and March 2022 (approximately 3 and ¾ years). WHP has delivered more than double this volume in 2½ years. Figure 1 below shows the 16 initial sites in red, and the new towers WHP have searched, acquired, designed, built and powered for the ESN Project in yellow, demonstrating the areas where WHP have developed relationships with site providers, Local Authorities, Communities and local build contractors. WHP now has successful sub-contractor relationships and we have the capability to deliver services to all islands in Scotland.

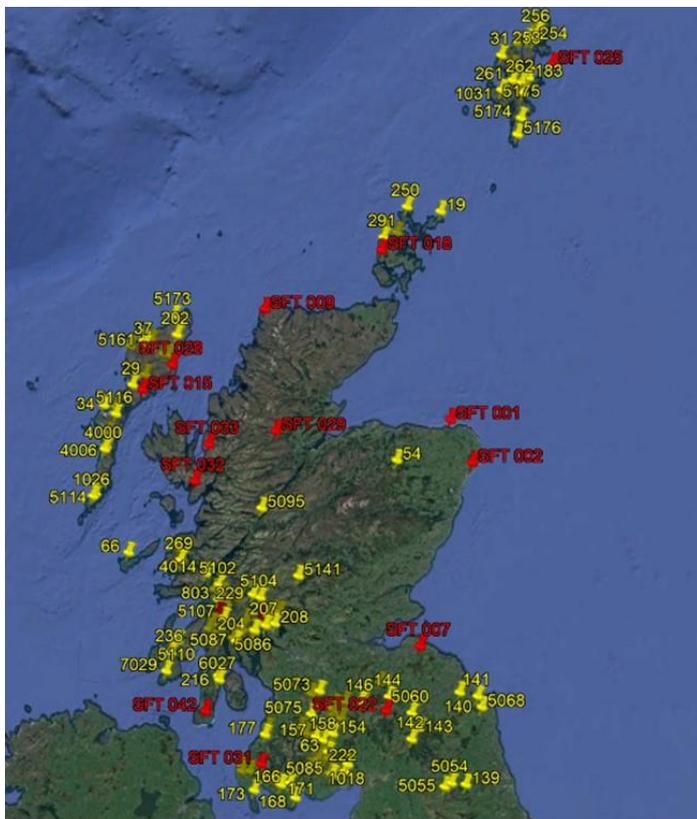


Figure 1 – WHP EE ESN Project new tower sites built in Scotland

WHP Telecoms can clearly demonstrate from this project alone that we have the capacity and capability to successfully deliver this project. We are convinced that other bidders will be unable to compare to WHP's track record in when it comes to Scottish rural new tower builds and H&I new tower builds. WHP's performance with this project has been outstanding, delivering more sites than our client's other suppliers combined. Our client asked WHP to work with our competitors to assist them improve their processes and we were invited by our client to present best practice to their client, the Home Office.

We have also been passed "problem" sites where other suppliers have failed to deliver. One of these was in Pennan, approximately 500m from SFT001 Pennan. Our competitor was unable to acquire a suitable site in this area. WHP completed the survey in November 2017, Heads of Terms agreed December 2017, Planning was approved in January 2018 and the site was legally accessed in February 2018 which provides a measure of the skills of our Property and Town and Country Planning specialists. We have also managed issues such as Crofting Laws and Agricultural Tenancies on over 35 sites to date (one recently requiring over 40 signatures!).

Case Study 2 – MBNL's Notice to Quit (NTQ) Project

WHP provides a turnkey managed professional service to support MBNL's Notice to Quit operations, responsible for Scotland (and areas of England). WHP are instructed once MBNL Estates Department have concluded that the Notice to Quit issued by their site provider is irrecoverable and a replacement site is required. This project highlights WHP's dynamic property services and deployment capabilities. The objective is to maintain radio coverage throughout the transition of removing a site from the network and replacing it. This can involve a combination of temporary sites, equipment lift and shifts, hot swaps of microwave links, site decommissioning and reinstatement and new site deployment. Notice to Quit scenarios present challenging deadlines and require careful management of the Notice to Quit site provider and their professional advisors. WHP have been MBNL's preferred supplier for many years and we have built over 60 replacement sites in Scotland for them.

WHP's Approach to delivering this Project

This section specifically addresses the Authority's key questions having provided the broader picture in our case study above.

(i) Approach to undertaking site surveys and coverage predictions;

Communication between the acquisition specialist carrying out the search, the radio planner, the community and the Local Planning Authority is key to a successful outcome as the decision on the location, tower design and tower height will have an impact on coverage and visual amenity and may require compromise in the more challenging areas. We begin by discussing the coverage requirements with the radio planner. Typically, we only work into one MNO radio planner but in this instance, we may be dealing with multiple MNOs. Our Technical Lead who will be responsible for delivering the Authority's coverage requirements will act as our interface between the Authority and MNOs and our acquisition surveyor who will be searching for suitable sites. Having understood the brief, our acquisition surveyor will liaise with our Town

and Country Planning specialists to understand the sensitivities prevalent to the area and will carry out a desktop study to see if there have been previous applications in the area for similar schemes. Planning failures will highlight sensitive areas for further discussion with the Local Planning Authority. Planning successes may uncover unutilised Planning consents that could be utilised or adapted, and it may uncover an ongoing application that could negate the need to progress the site or may offer a collaborative opportunity that may interest the Authority. The desktop study will also include a review of land ownership in the area, so precedents and existing contacts can be leveraged and some research on local interest and community groups such as Parish Councils. WHP's policy is to undertake extensive desktop research as this pays dividends and assists in obtaining the best outcome for our clients and for the community the tower will serve. We utilise Google Earth as a tool to review potential sites prior to visiting the area so appointments can be made in advance with prospective site providers. Once appointments have been made, we will also contact local interest groups and Local Planning Authorities to explain our requirements (in layman's terms), provide information requirements and to initiate the collaborative process of site selection.

Where required, we offer to meet with all stakeholders at a local venue in the form of an informal public meeting or roadshow event to make sure that we listen to local concerns and address them accordingly. We have found that the key to success is through collaboration and that once local people better understand the technical requirements and constraints such as heights required, access, power and transmission, which dictate which locations work and which do not, they are able to make informed judgements. In most cases this brings about a positive result with the benefits of having 4G coverage outweighing the visual impact of a mast

Our Technical Lead will utilise the ADTI Planning tool (this is the same as the tool used by the Authority), complemented by MNO Radio Planning tools where required.

Once candidate site options have been identified, the acquisition surveyor will visit the site to capture site provider details, requirements and expectations and take detailed photographs showing the agreed site access route, the site area itself and panoramic photographs showing the coverage potential from the site or a suitable vantage point showing the coverage from an elevated position where possible.

The report will be submitted to WHP's Technical Lead for review. The Technical Lead will produce a prediction plot for the location to determine minimum height requirements and to confirm coverage from the standard 30m tower height. These will be utilised when providing a recommendation to MNOs and the Authority to complete the site selection process, the outcome being a preferred site option and confirmation of the minimum height requirements.

(ii) Approach to obtaining necessary consents (including planning, landowner permission and any other regulatory consent);

Having invested time and effort in the search phase to engage the local community to assist in the selection process, the Local Planning Authority and landowner will already be engaged and informed, the idea being that once a site has been selected, Planning and Legal consents should just be a case of completing the formalities. In remote rural Scottish areas, such formalities can be considerably more demanding and

complex, especially when wider community and statutory consultation is required to obtain planning consent (World Heritage, Scottish Natural Heritage, Archaeology and Ecology studies, photomontages) and when Crofting Laws, Agricultural Tenancies and Superior Landlords are required for Legal Consent. It is WHP's responsibility to coordinate and drive the process which typically requires on-site meetings to maintain positive momentum, but our property team have the skills, experience and know-how to craft a successful outcome. Having already delivered many sites recently in the target areas, WHP can utilise existing contacts with the authorities and with specialist local partner companies which will accelerate delivery.

(iii) Approach to design and build of the mast (including construction);

WHP has a dedicated internal design team of 40 staff with established specialist partner companies available as and when required. Our team contains structural specialist and we utilise the MS Tower design tool. Our approach to the design and build of the mast begins at the initial search stage, incorporating community and Local Planning Authority interests into the design and siting of the site. In addition to the visual amenity aspects, environmental, sustainability, site access and maintainability considerations must be incorporated into the design to produce an effective solution. We also consult local specialist construction firms where required to discuss the pros and cons of how to design and build the sites including:

- **Tower base** – Traditional concrete base or are their rock anchor solutions?
- **Site access** – Is a permanent access required? Will a temporary access track suffice? Minimising the impact and reinstatement
- **Site location** – Can the siting minimise the visual impact? Can trees be removed to accommodate an improved amenity (sometimes edge trees cannot be removed due to the environmental impact on neighbouring trees)
- **Tower height** - What are the minimum height requirements? Larger base for future proofing (for this project we may have to implement a lower tower utilising a 30m base to future proof opportunities to extend the tower for further sharers).
- **Site maintenance** – Operators visit sites more often than you would assume so a sustainable solution for site access is required. This is particularly pertinent in areas of ecological interest.

For build, WHP has its own, dedicated Civils team that will build sites on the mainland and islands sites for Mull, Skye, Arran, Bute. WHP's approved civils subcontractors cover islands including Shetland, Lewis and Harris, North and South Uist, Benbecula, Orkney and Islay.

We undertake minuted project 'kick off' meetings that that identify all HSEQ inputs as well as reporting, escalations, subcontractors, day to day requirements etc. This contributes to a Construction Phase Health and Safety Plan which is developed for each project. Site specific Risk assessments, Method Statements and site inductions are undertaken, site activities are audited (both self-audited and independently) and tool box talks are delivered by the appointed site Person in Charge of Works who has sole responsibility for overseeing all activities and visitors to the site.

Our management and HSEQ approach remains constant throughout all our projects and customers. We operate a documented and processed sub-contractor

management regime, that runs from new sub-contractor status, business induction, adherence to WHP policies and processes, and on-going management system audits.

Health and Safety is at the forefront of everything that we do at WHP. Our impeccable H&S build record has been achieved through thorough design reviews (designing H&S considerations into our sites) and via our 18001 accredited processes led by our HSEQ team.

The project will be monitored throughout (initiated at the Project Kick off meeting and Project Initiation Document) by our HSEQ team who are:

[REDACTED] – HSEQ Manager

-Diploma NVQ Level 6 in Occupational Health and Safety

[REDACTED] – HSEQ Advisor

-NEBOSH National General Certificate in Occupational Health and Safety

[REDACTED] – HSEQ Advisor

-NEBOSH National General Certificate in Occupational Health and Safety

[REDACTED] – HSEQ Coordinator

-PPE Qualified Inspector
-LOLER

[REDACTED] – PPE Field Inspector

-PPE Qualified Inspector
-Latchways Inspector
-PAT
-LOLER

- **Site Auditors** – Project Team based (APs and Build Supervisors)

WHP's HSEQ team provide ongoing support to the company personnel including subcontractors. They work closely with our clients' HSEQ teams and are heavily involved in industry policy development. They keep our staff updated on all HSEQ matters (changes in legal and other requirements), outcomes of investigations etc. via H&S alerts via e-mail. WHP's HSEQ team also provide training for all new employees, both office based and site personnel, as part of their induction.

For field-based staff we provide training to ensure they have met the company training requirements for:

- First Aid
- Asbestos Awareness
- Manual Handling
- Street works
- CDM 2015 (subject to regular refresher training through tool box talks and targeted safety briefings)

For those who are required to work at height, they will also undertake:

- Rooftop training
- First Aid at Height
- Advanced Climber
- RF Awareness
- Climbing Medical Certificate.

To conclude, our design and build objective is to provide a sustainable solution which incorporates all appropriate stakeholder requirements to minimise the impact and maximise the benefits taking the longer-term view in providing an asset that can be utilised by 4G MNOs and local community initiatives to bring benefits to the residents and businesses in the target areas.

(iv) Approach to securing and managing the installation of power and backhaul;

WHP has established DNO relationships which we have used to order and manage power supplies for numerous clients and projects, including the case studies above. In addition to working with the DNOs to minimise the excavation works, WHP has innovated to enhance the DNO process specifically for rural areas. For the EE ESN project, we have six of our electricians trained and qualified to allow them to install electrical meters on behalf of Meter Operators (MOPs). We did this because MOPs were reluctant to visit remote sites given the commercial restrictions of the set fee and the travel time and costs associated. This caused delays initially. WHP electricians now have the capability to install the meter on behalf of the MOP which has helped improve delivery timescales by weeks.

For the Arqiva Smart Meter project, WHP has also innovated, capitalising on the low power equipment requirements. WHP has the Arqiva radio equipment tested and authorised for unmetered connection. The administrative work involved in obtaining this approval proved more challenging than initially anticipated, but this allows us to connect directly to the DNO supply whilst we are building the site. This improves delivery timescales, reduces disruption to the community and the environment and reduces costs.

WHP has an extensive backhaul capability using both fixed and Microwave solutions.

In addition to carrying out Microwave Link installations and Line of Sight surveys for MNOs, WHP also provides a turnkey service to some of our utility clients covering remote areas. For Scottish Power, WHP provides a turnkey microwave link backhaul service covering surveys and Line of Sight Surveys, the Ofcom Licence application, the Link Design (using the same ADTI planning tool as the Authority), site/tower structural calculations, steelwork installation and finally the dish and microwave equipment supply, installation and commissioning. We also provide maintenance services for the links once installed. These often include remote areas including Wind Farms.

WHP has over 100 riggers, about 15% of these are specialist Microwave Riggers and Installers. WHP are approved and accredited to work on sites owned and operated by Arqiva, MBNL, Wireless Infrastructure Group (WIG), Vodafone / TEF (CTIL) BT. WHP have access to Arqiva's Gateway and WIG's OCAMS site access portals. This

universal accreditation means WHP can plan, acquire, design and deliver Microwave links using existing sites given our relationships and access to these sites.

In addition to high capacity Ethernet microwave transmission works in rural areas, WHP also have experience in delivering fibre transmission solutions directly and via 3rd party providers. This experience has been gained primarily through involvement with rural broadband initiatives such as Pathfinder North & South (Scottish Government 2007-2009) in conjunction with Scottish Telecom (THUS), D & G council, Argyll and Bute and Highlands Council.

The implementation of 3rd party fibre circuits from BT was a significant element of this project and included the management of LES / WES 100 circuits, engagement with BT's Pre-Sales Engineering and Feasibility Engineers as well as placing and tracking wholesale orders (and invoicing) through BT's 'eCo' system. This included management of network termination installations, reporting on SLAs, managing dependencies, removal of blockers (wayleaves etc) and facilitating engineer access to allow survey and installation works to take place. In particular, tight control over 'excess engineering costs' was crucial in order to maintain budgetary compliance.

WHP also worked closely BT through the Carillion-Telent joint venture (Project Beck) which entailed WHP carrying out the survey and planning of over 12,000 street cabinets to facilitate Fibre to the Cabinet upgrades. Besides working directly with BT on previous rural broadband projects, WHP have regular workstreams with Virgin Media and City Fibre in connection with transmission upgrades and live cut-overs for the MNO community who are enhancing their existing fibre connectivity to support 4G backhaul and future proof their systems in readiness for 5G deployment.

For fixed connections WHP works in tandem with BT on the Arqiva Smart Metering Project, using BT's cost estimate templates to calculate connection costs and Excess Construction Charges (ECCs) for budget approval prior to instruction. For this project, WHP has already engaged with BT's R100 team in Scotland to initiate discussions. WHP will consider all backhaul solutions available (SSE, BT, Microwave) and will submit a recommendation to the Authority for review prior to implementation.

(v) Approach to bringing mast into operation and securing mobile operator and other third-party users (including how deal with incentivising use);

WHP provides services for all UK MNOs including the installation and commissioning of both transmission and radio equipment. This includes carrying out extensive call testing and producing a handover pack. WHP's installation and commissioning engineers are trained on all major vendor equipment including Nokia, Ericsson and Huawei. Bringing a mast into operation is a standard service we provide to our Operator and equipment vendor customers.

WHP has CTO/COO level relationships with all UK MNOs so the availability of this opportunity will be discussed at CTO and Regional Manager level. We will incentivise use by providing a discounted site rental to help create a successful business model for the MNOs in remote rural areas, removing the passive capex costs and reducing Opex.

We will also publicise subsidised usage for community projects during the site search stage to encourage community support for the development. Peppercorn rent opportunities could be reciprocated by leveraging community involvement (ie we pay a peppercorn rent for the mast in return for a peppercorn rent for community project usage).

Our approach to delivering and managing the assets ERDF and the Scottish Government have invested in will embody the objective stated on the briefing day in Edinburgh, that is “**4G mobile coverage delivered to under-served areas via a collaborative platform that accelerates the deployment of future proofed infrastructure**”.

(vi) Approach to minimizing the environmental impact of infrastructure including minimising emissions, visual impact and material impact;

In the design section above, we have described how we will go about involving the community stakeholders and authorities in the design of the site itself to locate the site in such a position that it minimises the visual impact.

Emissions will be minimised by carrying out extensive desktop research prior to visiting areas to search for sites. Search and build phases will be carried out as contiguously as possible to minimise travel and local sub-contractors will be utilised, again to minimise travel and vehicle emissions. We have based the pricing on a 10m by 10m compound to accommodate the specified sharers but we have minimised the implementation of permanent new tracks to sites wherever possible.

Rock anchors will be utilised where possible to minimise the material impact of concrete bases. This will also reduce the environmental impact. WHP have environmental policies in place. Our HSEQ team reviews every project to monitor best practice in order to maintain our ISO14001 (Environmental management) certification and standards.

(vii) For each Initial Site, having regard to the Authority’s environmental policy, Tenderers must select whether rock anchors or concrete foundations are to be used. Where concrete foundations are proposed for an Initial Site, the Tenderer must explain why the rock anchor was unsuitable;

WHP is currently in the design stage of a project replacing Police towers in Scotland, some of which are rock anchor designs, so we are aligned with the Authority’s environmental policy regarding the use of rock anchors.

We have reviewed the MSV reports and have identified 5 potential rock anchor sites from the 16: this number may increase or decrease subject to survey. The 5 are listed below:

Ref	Name	Rock Anchor
SFT004	Carrick Castle High Road	Yes
SFT009	Blairmore	Yes
SFT015	Manish	Yes
SFT025	Old Radio Site The Lookout	Yes
SFT028	Leumrabhagh	Yes

Figure 3 – Rock anchor sites

The photographs of SFT004 suggest the area is loose limestone pavement so we have concerns that this site may not be feasible as a rock anchor design, but this will be investigated further once on site.

Question 2 – Infrastructure Operation

WHP will utilise its Glasgow office for both planned (proactive) maintenance and reactive maintenance. As with our current projects in remote areas, an assessment will be made as to whether a permanent generator is required as a back-up for power.

Proactive and on-going management, maintenance and service continuity will be delivered using site maintenance best practice. Given the hostile environmental conditions in many of the locations and proximity to the sea (increasing the risk of corrosion) for some, an annual site inspection and climb survey will be carried out in early summer with fixes either implemented on the day (where possible) or on a return visit prior to winter setting in. In addition to the climb inspection, our riggers will also annually certify each tower for “safe to climb”. Whilst this only needs to be carried out once every two years we feel this is required for this portfolio of sites. The electrical systems and earthing will also be checked annually although this is only required for electrical conformance every 3 years. As part of the annual check, basic site housekeeping will be carried out and we will visit the site provider/tenant to check that they are happy and have nothing to report.

Reactive maintenance will be managed from our HQ office which will act as the point of contact for MNOs and other sharers. Any reported fault will be triaged and assessed and will be awarded a priority which will determine the service level agreement for attending site to investigate and then fix the fault. Our Glasgow and field-based riggers, electricians and maintenance engineers will form the core team with our local subcontractors providing first and second line services for the remotest areas. We have established excellent working relationships with our local subcontractors with every Island covered from a build perspective. Subcontractors will be retained for planned and reactive maintenance services.

Please note that WHP has the following HSEQ accreditations:

- OHSAS 18001 (H&S management),
- ISO9001 (Quality management)
- ISO14001 (Environmental management)

As with all WHP Projects, the operations and maintenance process will be monitored by our HSEQ team (see Q1 above).

Question 3 – Project and Resource Management

WHP will use a tried and tested project and resource management model with a dedicated Project Team working with the Authority and stakeholders whilst utilising WHP’s specialist delivery teams (Property, Design, Construction, Field Services etc) governed by our Operations Director and his direct reports. See Figure 3 below.

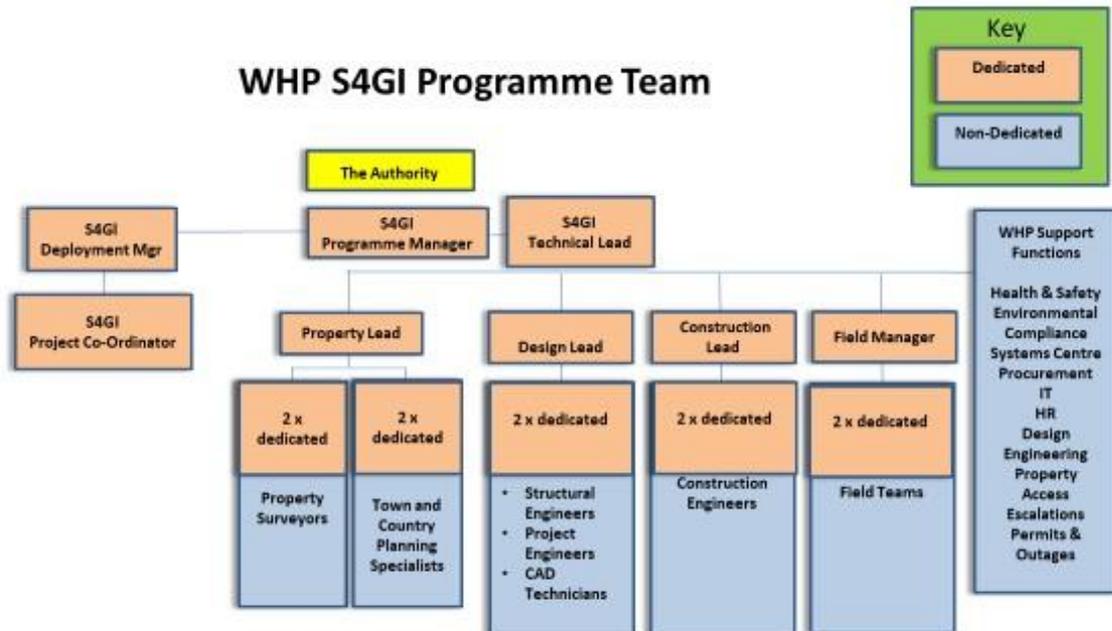


Figure 3 – WHP Organisation for the Scottish 4G Infill Project

The project will be delivered utilising the following Key Milestones:

- **Mx1 – Key Consents**
All sites must have Milestone 1 by 30th March 2020 (and all funding committed by 31st March 2020). Mx 1 comprises:
 - Planning consent
 - Heads of Terms (with an MNO to provide 4G service from the site)
- **Mx 2 – Detailed Design**
A copy of the final and approved detailed design drawings is required to achieve this milestone
- **Mx3a – Power**
To achieve this milestone evidence that the invoice from the Regional Electricity Company (DNO) has been paid is required.

- **Mx 3b Backhaul**
To achieve this milestone evidence that the invoice from the backhaul provider has been paid is required
- **Mx4 Build Completion**
A certificate from the Independent Tester in the form provided in Schedule 4 Part 4 that Infrastructure Works have been completed in accordance with the Authority Technical Requirements and the Infrastructure Provider Solution is required to claim this milestone and the following deadlines apply:
 - 50% of the initial sites must have Mx 4 by June 2019 (12 months from the effective date)
 - 50% of the Sites then included in the Project must have Mx 4 by 31 March 2020;
- **Mx 5 – Service Live**
This is the final milestone, requiring a Certificate from the Independent Tester in the form provided in Schedule 4 Part 4 confirming that the equipment installed is live and is functioning according to specification to provide a 4G Service throughout the Coverage Area. Sample tests and user experience checks, including and not limited to voice and data services, will also be carried out as part of the certification. The deadline for all sites is 31st March 2022

The Authority has until 30 Sep 2019 to require additional sites with all funding committed by 31st March 2020 (which is why all sites require Mx 1 by 30th March 2020).

For the initial 16 sites, Planning (if required) must be submitted within 6 months from the effective date, with at least 50% of these built (Mx 4) 12 months later.

MNO engagement is a prerequisite for MX 1. WHP provides services for all MNOs which means we have contacts at all levels, from the board room to the regional deployment teams. Equally (or more) important though is engaging at a granular level with the cell planner and local teams who have been “sweating” these cells for decades. In addition to this, WHP manages most of the site share activity between the mobile operators, providing the vital link in negotiating sharing processes between the MNOs and are therefore uniquely positioned, having completed many hundreds of successful transactions between the MNOs.

WHP will implement a multi-layered approach to MNO engagement:

- WHP’s Board will engage at CTO/Deployment Director level
- Our Head of Site Share will lead our engagement through our MNO site share channels
- Our Regional Deployment teams, Operations Director and our Regional Directors will engage with the MNO teams which include the radio planning leadership.
- Our site share managers, surveyors and project staff who work hand in hand with MNO teams will be engaged at the most granular level.

WHP has acquired, designed and built 125 new sites (all towers) in remote rural areas in Scotland in approximately two and a half years on a similar type of project (EE’s

ESN Project). This included the search phase. For the initial 16 sites, the search phase has been completed so this will reduce timescales for the first 16 sites. WHP will not require any lengthy mobilisation process as we have all resources in place to deliver this project within our existing resource pool. An indicative project plan for the initial 16 sites can be found in Figure 4 below:

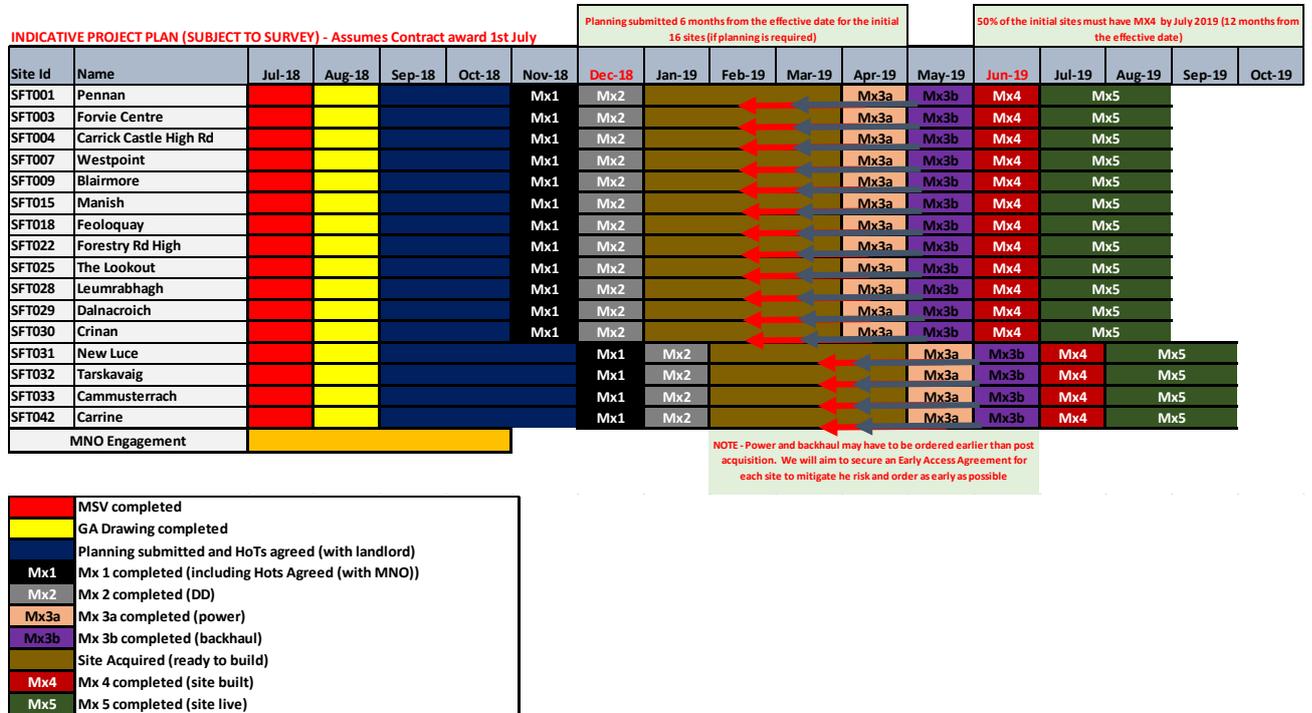


Figure 4 – Indicative Project Plan for the initial 16 sites

A more detailed indicative individual site plan is shown in Figure 5 below, showing the main activities that contribute to each Milestone. The durations are indicative and can be longer and shorter as well as iterative if problems are encountered.

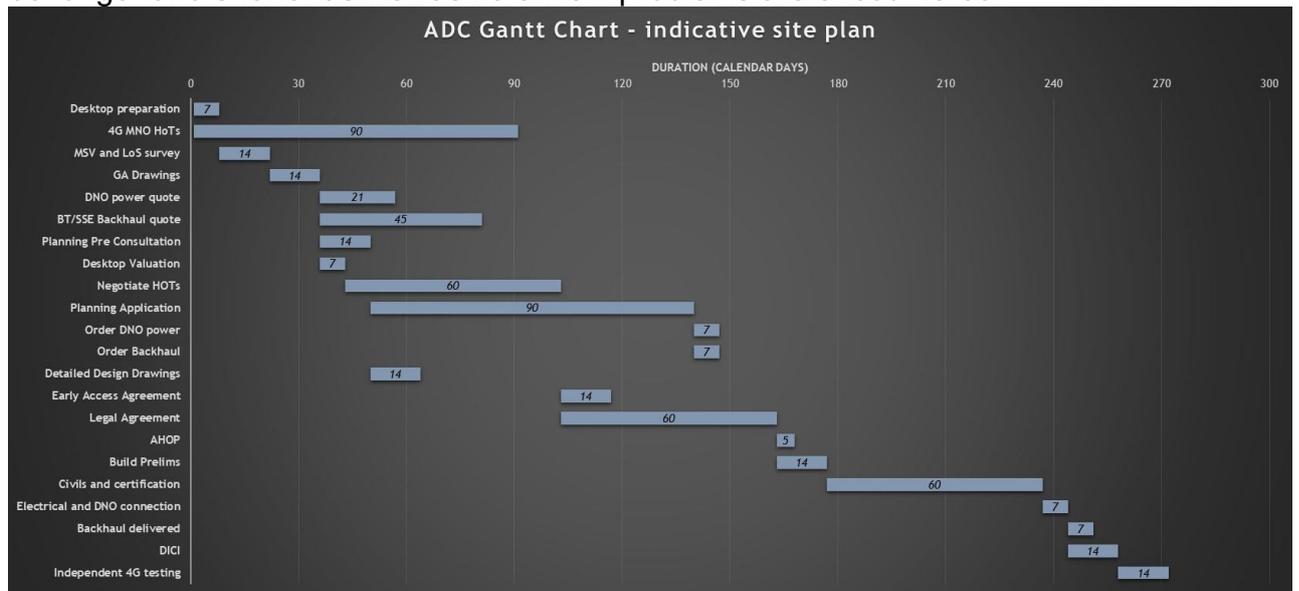


Figure 5 – Indicative site plan

Additional sites will be searched as soon as the Authority provides them. We would like these as soon as possible. Please note that all projects have a few problem sites that are either stopped due to the challenges encountered or miss the deadline for similar reasons. WHP recommends that the Authority provides a bigger “pot” of sites than will be required to fully utilise the funding available, especially given the areas this project aims to pioneer.

We will initiate this project with a project initiation meeting where we will review anticipated run-rates for the issue of additional sites to WHP. WHP can assure the Authority that we have the resources in place already to tackle these additional sites so there will be no mobilisation delays. WHP are eager to deliver as many sites as possible within the budget and timelines above. We appreciate March 2020 is a fixed delivery deadline, although there may be extensions possible to cover issues that arise (the ERDF financial completion extends to the end of the calendar year).

WHP has its own, dedicated Civils team that will build sites on the mainland and Any islands such as Mull, Skye, Arran, Bute. WHP’s approved civils subcontractors include:

- **Shetland** - Tulloch Developments Ltd
- **Lewis and Harris** - Duncan Mackay & Sons Ltd
- **North and South Uist, Benbecula** - MacInnes Bros Ltd
- **Orkney** - Heddle Construction Ltd
- **Isle of Islay** - TA & WN Wood Contractors Ltd

Our approach to organising and managing key subcontractors to ensure that the Infrastructure Works are delivered within the stipulated timescales is tried and tested, with subcontractors falling into our HSEQ processes outlined in 1 (iii) above.

Our approach to communication and engagement with the Authority, SFT and wider stakeholders will be via our dedicated Project Team led by our dedicated Programme Manager (see Figure 3 above). WHP are aware of the additional overhead required for Government and ERDF Projects and the importance and benefits of effective stakeholder management and communications having managed ERDF/DCLG/Local Government Projects previously (Superfast Broadband Project for Greater Manchester and Pathfinder). Our Programme Manager, accompanied with a Company Director, will attend the Oversight Group Meetings to present a Progress Report in accordance with Schedule 9 of the draft Grant Agreement. This will include as a minimum the following:

- A review of the milestone achievements to date:
 - Progress with obtaining each Key Consent
 - Design
 - Build
 - Power supply build and acquisition
 - Transmission build and acquisition;
- A review of the risks and issues register together with mitigation updates.
- An assessment of the risks, with reference to the specific Grant Agreement Clauses

- The status of any matters covered by a Remedial Plan.

We would also like to add to this report and meeting, a review of the projected funding requirements, given the aim to spend of as much of the £25M funding as possible within the timescales and the risk of corrections if this is not achieved. This will provide the Oversight Group with the information required to keep the ERDF team fully informed at all times to mitigate this risk as much as possible.

Question 4 – Community Benefits

WHP recognises that in delivering the Project, we are required to consider social considerations (also referred to as Community Benefits) and will be expected to adopt measures that encourage:

- Targeted recruitment and training of the long-term unemployed
- Educational benefits to communities, to maximise educational opportunities that arise through performance of the agreement
- Awareness of opportunities, either in a prime or sub-contracting role, for small to medium (SME) sized businesses and social enterprises.

WHP already has a track record in establishing community benefits as demonstrated by our existing sub-contractor list (see Q3 above) and our community engagement when searching for suitable site locations (see Q1 above). Specific to this Project, WHP will maximise local capacity and skills in and around the sites by engaging our subcontractors who employ local labour. This will assist their sustainability. We will also ensure that SME's within the local areas in and around the Sites in other locations are given the opportunity to bid for any subcontracted work during the deployment period to expand our supplier base having established a slick process for selecting, on-boarding and managing sub-contractors in remote areas already.

As with the EE ESN project, we will engage community groups from the outset to seek their input into the deployment aspects of the project (as described in Q1 above) and also to establish if they can utilise the mast asset for local use and connectivity which will assist with educational and potentially e-commerce and remote working opportunities for the local community. Local community sharers will be accommodated at a subsidised rate generally but where a local community has provided significant assistance, such as providing a site for a peppercorn rent, then this could be reciprocated for tower sharing for certain situations.

Given the spread of sites anticipated and the short life cycle of site development work, the employment benefits are limited to engaging our existing and new local subcontractors, however, the ongoing planned and reactive maintenance activities will provide an opportunity for WHP to “upskill” local SMEs to provide general maintenance services to improve response times and reduce costs and environmental impacts. SMEs may be unwilling to provide working at height (rigging) work given the heavy training, equipment and HSEQ overhead required to carry out this work to the standards required which may be too much for the volume of work available but this will be investigated as an option.

Having established our SME supplier base for remote Scottish locations, we already have the framework in place to provide community benefits via subcontracting, but dependent on the locations of the additional sites, there is the potential to expand our list of rural, community based, Scottish SMEs.

The process we used to find and on board the contractors was as follows:

- We first obtain a list of potential contractors using online search tools (a desktop review) and then contact each of them to establish their interest.
- We then send out tender documents to all interested parties.
- Where required we then visit the contractors at their premises to discuss in more detail, requirements, scope and pricing.
- Once the contract is awarded or during final pricing, we have a prestart visit to the site to discuss and agree the optimum logistics and build methodology.
- In parallel we carry out a full WHP induction via our HSEQ team. No subcontractor is permitted to start a job for WHP until they have been reviewed and approved by our HSEQ team and the full on boarding process concluded with our procurement department.
- Once the work starts, we implement monitoring and audits together with a snagging visit on completion of works.

Sometimes potential SMEs are missed at the desktop review phase and come to us on recommendation and word of mouth. Others make themselves known as they hear of us or see Town and Country Planning notices; Tulloch Developments was one of these.

WHP's existing supplier base is 90%+ SMEs. WHP confirms that it will seek to ensure that, where WHP proposes to subcontract any of the Infrastructure Works prior to or at any time during the Term, SMEs (when compared with other potential Subcontractors) are given fair, equal and proportionate access to the subcontracting opportunity.

Where practicable (the contract timetable may dictate that we are unable to do this for a proportion of the sites), WHP will advertise subcontracting opportunities in a form which is accessible by all potential subcontractors including SMEs on the Public Contracts Scotland Portal. WHP will continue to utilise commercial, financial and technical terms and conditions that are, appropriate and proportionate to the nature, size and capacity of the proposed subcontractor, having regard to the services to be subcontracted, and will be no more onerous than the relevant terms and conditions proposed to other potential subcontractors. WHP has already demonstrated benefits to SMEs in remote areas of Scotland and will continue to do so.

Specific and measurable actions are:

1. Community benefits

WHP will donate 5% of all SFT site rentals to a Community Benefit Fund. Funds will be distributed to local stakeholder groups. Guidance from the Authority as to how best distribute this will be appreciated.

2. Deployment and network maintenance:

- WHP will inform the Authority when we intend to subcontract work and will keep the Authority informed of how we are involving SMEs in the process. The Authority will be informed of the outcome of the tendering process.
- Having appointed subcontractors, we will monitor the progress of SMEs and ensure that the Authority is kept informed of contracts awarded, details of the successful SMEs, a summary of the community benefits etc.
- WHP will provide the Authority with a monthly summary of the value of the work awarded to SMEs.
- WHP will provide the Authority a monthly summary of SMEs that have benefited from WHP's training, the skill sets involved and the benefits of the "up skilling" provided.

Question 5 – Fair Work Practices

Fair work Practices are at the forefront of our work at WHP. We are seeking accreditation in 2018 with Investors in People and will incorporate the Scottish Business Pledge and the Scottish Living Wage accreditation into this activity (Scottish Living wage only appears to apply to companies that have a HQ in Scotland but we'll discuss this further with the Authority). Please note that envisage no problems gaining accreditation given the focus and investment WHP has on employees.

Our internal, dedicated, HR team administer our HR handbook which is located on our company intranet for ease of access to all staff. We have 400+ staff treating employees and contract staff with parity across the board. Our staff turnover is very low (sub 3%) which speaks for itself when judging WHP as a good employer in such a competitive industry.

We invest heavily in our workforce's competency and training from mandatory HSE training, through to funding of professional qualifications, degrees and masters. Our staff receive many benefits in addition to their salary which includes a pension and private healthcare. Recently we have increased staff holidays by 3 days to reward the staff for their excellent performance. We pay above market rates, far more than the living wage (we can confirm all employees are above living wage). Our field staff receive generous overtime payments and allowances. Our flexible working policies have been designed to improve our employees' work / life balance. We have also accommodated individual career breaks when requested as well as part time working and flexi-time. We have apprentices in the company working under the Modern Apprenticeship Scheme and our internal training and promotion (developing staff from within) has been a key pillar in WHP's success when it comes to retention and attracting staff. All staff receive annual appraisals and training plans and we operate grievance and whistle blowing procedures for those employees who (rarely) feel the need to escalate any issues further.

Our work environment for our employees is important and investment is on-going. Field staff have all recently received brand new fleet vehicles fitted with trackers for their safety and we are about to move our HQ in Warrington to superior office accommodation in a nearby business park to improve our working environment. Environmental Social Governance aspects and general ethical behaviour is important to WHP and that applies to our business practices. As such, we do not use zero hours contracts or umbrella companies. We feel communication is key building a culture where staff feel they “belong”. Activities including, ‘star of the month’ awards, charity events, company days and e-mails welcoming new employees all help build the culture.