



NEVIS ELECTRICITY COMPANY LTD.



**ENVIRONMENTAL, SOCIAL,
HEALTH & SAFETY**

POLICY

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Contents

1	Introduction.....	5
1.1	Purpose of the ESHS Policy.....	5
1.2	Scope and Applicability.....	6
1.3	Policy Framework.....	6
1.4	Definitions and Abbreviations.....	8
2	Policy Statement.....	9
2.1	Commitment to ESHS Standards.....	9
2.2	Alignment with International Best Practices.....	9
3	Organizational Structure and Responsibilities.....	10
3.1	ESHS Roles and Responsibilities.....	10
3.2	Training and Competency.....	10
3.3	Organizational Commitment.....	10
4	Legal and Other Requirements.....	11
4.1	Compliance with National Legislation.....	11
4.2	Adherence to International Agreements.....	11
4.3	Regulatory Monitoring.....	11
5	Risk Management.....	12
5.1	Identification of ESHS Risks.....	12
5.2	Risk Assessment and Mitigation Strategies.....	13
5.2.1	Risk Assessment.....	13
5.2.2	Mitigation Strategies.....	13
5.2.3	Monitoring and Review.....	13
5.2.4	Stakeholder Involvement.....	14
5.2.5	Continuous Improvement.....	14
5.3	Risk Communication.....	14
5.3.1	Communication Principles.....	14
5.3.2	Communication Channels.....	15
5.3.3	Stakeholder Engagement.....	15
5.3.4	Emergency Communication.....	15
5.3.5	Monitoring and Review.....	15
6	Operational Controls.....	16
6.1	Environmental Management.....	16

6.1.1	Waste Management	16
6.1.2	Resource Use and Efficiency	16
6.2	Social Engagement and Community Health.....	16
6.2.1	Community Engagement.....	16
6.2.2	Impact Assessment	16
6.3	Occupational Health and Safety	17
6.3.1	Workplace Safety	17
6.3.2	Health Surveillance.....	17
7	Project Management and Implementation.....	18
7.1	Overview of Renewable Energy Projects	18
7.1.1	Geothermal Energy Initiatives	18
7.1.2	Wind and Solar Power Developments.....	18
7.2	Infrastructure Development.....	18
7.2.1	Transmission System Upgrades.....	18
7.2.2	Submarine Cable Links	19
7.3	Project Lifecycle Management	19
7.3.1	Planning and Design	19
7.3.2	Construction and Commissioning.....	19
7.3.3	Operation and Maintenance	19
8	Emergency Preparedness and Response	21
8.1	Emergency Planning.....	21
8.2	Incident Reporting and Investigation.....	21
8.3	Emergency Response Training.....	21
9	Monitoring and Measurement	22
9.1	Performance Indicators	22
9.2	Auditing and Reporting.....	22
9.3	Data Management.....	22
10	Review and Continuous Improvement	23
10.1	Policy Review Process	23
10.2	Corrective and Preventive Actions.....	23
10.3	Continuous Improvement Strategies	23
11	Stakeholder Engagement	24
11.1	Public Disclosure and Transparency.....	24

11.2	Grievance Mechanism.....	24
11.3	Stakeholder Communication.....	24
12	Appendices	25
12.1	Relevant International Guidelines and Standards.....	25
12.2	References to CDB, IDB, IFC and World Bank Documents.....	26
12.3	Glossary of Terms	27

1 Introduction

1.1 Purpose of the ESHS Policy

The **Environmental, Social, Health and Safety (ESHS) Policy** of the Nevis Electricity Company Limited (NEVLEC) articulates our unwavering commitment to environmental stewardship, the safety of our workforce, and the health of the communities we serve.

This policy serves as the cornerstone of our **ESHS Management System** and guides our actions to ensure that all aspects of our operations harmonize with the principles of sustainable development.

The objectives of this policy are to:

1. **Ensure Compliance:** Adhere to all applicable environmental, social, health and safety laws and regulations at local, national, and international levels.
2. **Promote Safety:** Create a workplace that prioritizes the safety and well-being of our employees, contractors, and the public.
3. **Protect the Environment:** Minimize our environmental footprint through responsible management of resources and reduction of waste and emissions.
4. **Foster Health:** Support the physical and mental health of our employees and the communities affected by our operations.
5. **Encourage Continuous Improvement:** Strive for excellence by continuously improving our ESHS performance through innovation and learning.
6. **Engage Stakeholders:** Actively involve stakeholders in our ESHS endeavors to build trust and ensure transparency in our operations.

This policy applies to all NEVLEC activities including, but not limited to, power generation, distribution, and administrative functions, as well as the planning and implementation of renewable energy and other projects.

It is the responsibility of every NEVLEC employee and partner to understand, endorse, and implement this policy in their daily work and decision-making processes.

1.2 Scope and Applicability

This ESHS Policy applies to **all NEVLEC activities**, encompassing the entire organization, including but not limited to:

1. Existing Operations

- The operation and maintenance of NEVLEC's current power generation facilities, transmission lines, and distribution networks.
- Administrative functions, procurement, and support services.

2. Renewable Energy and Other Projects

- The planning, development, and implementation of renewable energy initiatives, including geothermal, wind, and solar projects.
- Infrastructure upgrades and expansions.

3. Future Endeavors

- Any new ventures, technologies, or services undertaken by NEVLEC.
- The policy extends to future projects, ensuring that ESHS considerations are integral from the outset.

This policy applies to all employees, contractors, and stakeholders involved in NEVLEC's operations. It sets the framework for responsible practices across the organization, promoting sustainability, safety, and health.

1.3 Policy Framework

The NEVLEC ESHS Policy is structured to provide a clear and systematic approach to managing environmental, social, health and safety issues in a manner that is consistent with our core values and operational goals.

The policy framework is designed to:

1. Integrate ESHS Management

- Embed ESHS considerations into all aspects of our operations, from strategic planning to day-to-day activities.
- Ensure that ESHS management is a shared responsibility across all levels of the organization.

2. Align with International Standards

- Reflect the principles and standards set forth by international bodies such as the CDB, IDB, IFC and World Bank.
- Incorporate best practices from global ESHS management systems.

3. Comply with Legal Requirements

- Adhere to all relevant local, national, and international environmental and safety laws and regulations.
- Stay updated with changes in legislation and ensure ongoing compliance.

4. Promote Continuous Improvement

- Establish processes for regular review and improvement of our ESHS practices.
- Encourage innovation and the adoption of new technologies that enhance ESHS performance.

5. Foster Stakeholder Engagement

- Engage with employees, communities, regulators, and other stakeholders in a transparent and inclusive manner.
- Ensure that stakeholder feedback is considered in the development and implementation of ESHS initiatives.

6. Ensure Accountability and Transparency

- Set clear ESHS objectives and targets, and measure performance against these benchmarks.
- Report on ESHS performance openly and honestly, both internally and to external stakeholders.

This policy framework serves as the foundation upon which specific strategies, programs, and procedures will be developed and implemented to achieve NEVLEC's ESHS objectives.

1.4 Definitions and Abbreviations

In the context of the NEVLEC Environmental, Social, Health, and Safety (ESHS) Policy, certain terms and abbreviations are used with specific meanings to ensure clarity and a common understanding among all stakeholders.

This section provides definitions and abbreviations that are essential for interpreting and implementing the ESHS Policy effectively.

Key definitions relating to the ESHS Policy are as follows:

- "**Environment**" refers to the natural surroundings in which the company operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.
- "**Social**" encompasses the company's interactions with the communities within which it operates and its social responsibilities.
- "**Health**" is concerned with the physical and mental well-being of the company's employees and the communities affected by its operations.
- "**Safety**" pertains to the measures and practices in place to prevent accidents and injuries in the workplace and surrounding communities.

Abbreviations used throughout this policy include:

1. **CSR**: Corporate Social Responsibility
2. **EIA**: Environmental Impact Assessment
3. **ESHS**: Environmental, Social, Health and Safety
4. **ESIA**: Environmental and Social Impact Assessment
5. **HSE**: Health, Safety, and Environment
6. **NEVLEC**: Nevis Electricity Company Limited
7. **PPE**: Personal Protective Equipment

These definitions and abbreviations are not exhaustive and may be expanded upon as necessary to address specific issues or changes in legal or regulatory requirements.

It is the responsibility of all employees and contractors to understand and adhere to the meanings and implications of these terms as they apply to their roles and responsibilities within NEVLEC's operations.

Compliance with these definitions and abbreviations is mandatory and essential for the consistent application of the ESHS Policy.

2 Policy Statement

NEVLEC's Environmental, Social, Health, and Safety (ESHS) Policy is a testament to our unwavering commitment to uphold and exceed the standards for environmental stewardship, social responsibility, and occupational health and safety.

This section outlines our core beliefs and the principles that guide our actions.

2.1 *Commitment to ESHS Standards*

- NEVLEC is dedicated to maintaining a safe, healthy, and sustainable environment for our employees, customers, and the communities we serve.
- We commit to implementing comprehensive ESHS standards that are designed to protect and enhance the quality of life for present and future generations.
- Our approach is proactive, focusing on the prevention of environmental degradation and the promotion of health and safety in all our operations.

2.2 *Alignment with International Best Practices*

- In our pursuit of excellence, NEVLEC aligns its ESHS policies with international best practices.
 - We actively engage with global experts and institutions to stay abreast of the latest developments and innovations in ESHS management.
 - By integrating these practices into our operations, we ensure that our activities not only comply with but also set benchmarks for industry standards.
 - Our policy is dynamic, evolving with the advancements in technology and the changing needs of our environment and society.
- Through this policy statement, NEVLEC reaffirms its dedication to responsible corporate citizenship and its role in fostering a sustainable future.
 - We recognize that our operations have a direct and indirect impact on the environment and society, and we are committed to conducting our business in an ethical, transparent, and accountable manner.
 - Our ESHS policy is the cornerstone of this commitment, guiding our decision-making processes and operational strategies to achieve our goals of sustainability and excellence in service.

3 Organizational Structure and Responsibilities

3.1 ESHS Roles and Responsibilities

The organizational structure of NEVLEC is designed to support the effective implementation of the Environmental, Social, Health, and Safety (ESHS) Policy. Key roles and responsibilities are defined to ensure accountability and facilitate a culture of safety and environmental stewardship.

The Board of Directors holds the ultimate responsibility for the ESHS Policy, providing strategic oversight and ensuring that ESHS considerations are integrated into corporate decision-making processes.

The ESHS Committee, comprising senior management representatives, is tasked with the development, implementation, and periodic review of ESHS strategies and objectives.

Functional managers are responsible for enforcing ESHS procedures within their respective departments.

All employees are required to adhere to ESHS practices and report any concerns or incidents.

3.2 Training and Competency

To maintain a high level of ESHS competency, NEVLEC commits to providing ongoing training for all employees. This training will cover a range of topics, including but not limited to:

- ESHS risk identification,
- Emergency response, and
- Sustainable operational practices.

The goal is to empower every member of the organization with the knowledge and skills necessary to perform their duties safely and sustainably.

NEVLEC will also ensure that contractors and suppliers are informed of and comply with the company's ESHS standards.

3.3 Organizational Commitment

NEVLEC's commitment to ESHS extends beyond compliance with legal requirements. The company pledges to continuously improve its ESHS performance by setting measurable objectives and targets, promoting a proactive culture of risk management, and encouraging open communication on ESHS matters.

This commitment is underpinned by the belief that a robust ESHS framework is integral to the long-term success and sustainability of the company's operations.

4 Legal and Other Requirements

4.1 *Compliance with National Legislation*

- NEVLEC is committed to full compliance with all applicable national legislation including those relating to Environmental, Social, Health, and Safety (ESHS) aspects.
- This commitment extends to ensuring that all operations, activities, and projects are conducted in accordance with the laws and regulations of Saint Kitts and Nevis.
- NEVLEC will maintain a proactive approach to legal compliance by regularly reviewing and understanding the relevant legislation, obtaining necessary permits, and adhering to the conditions set forth therein.

4.2 *Adherence to International Agreements*

- In addition to national laws, NEVLEC recognizes the importance of international agreements and standards related to ESHS.
- The company pledges to adhere to such agreements as they pertain to its operations, particularly those ratified by the government of Saint Kitts and Nevis. This includes, but is not limited to, agreements on climate change, biodiversity conservation, and pollution control.
- NEVLEC will strive to align its ESHS practices with global best practices and standards, thereby contributing to international efforts in these critical areas.

4.3 *Regulatory Monitoring*

- To ensure ongoing compliance with both national and international ESHS requirements, NEVLEC will implement a robust regulatory monitoring program.
 - This program will involve the regular monitoring of ESHS-related legal developments, both within Saint Kitts and Nevis and internationally, to anticipate and adapt to changes in the regulatory landscape.
 - The program will also include periodic internal reviews and audits to verify compliance and identify areas for improvement.
 - NEVLEC will engage with regulatory authorities in a transparent and cooperative manner to facilitate compliance and address any issues that may arise.
- Through these measures, NEVLEC affirms its dedication to operating responsibly and sustainably, recognizing that legal and other requirements are foundational to the protection of the environment and the health and safety of its employees, customers, and the communities it serves.

5 Risk Management

5.1 Identification of ESHS Risks

The identification of Environmental, Social, Health, and Safety (ESHS) risks is a critical step in the risk management process. It involves a systematic examination of all potential ESHS risks associated with NEVLEC's operations and activities.

This process begins with the development of a comprehensive inventory of risks, categorized by their nature i.e. whether environmental, social, health-related, or safety-related.

- **For environmental risks**, this includes assessing the potential for pollution, resource depletion, and biodiversity loss.
- **Social risks** encompass issues such as impacts on local communities, land use conflicts, and infringement on indigenous rights.
- **Health risks** are evaluated in terms of potential occupational hazards and public health concerns.
- **Safety risks** are identified by examining the potential for accidents and injuries within NEVLEC's operations.

Once risks are identified, they are evaluated based on their likelihood and potential impact. This evaluation is informed by historical data, industry standards, and stakeholder input.

The most significant risks are those that have the highest potential to cause substantial harm to people, the environment, or the company's reputation and are therefore prioritized for further action.

The identification process is not static; it is a dynamic and ongoing activity that requires regular updates to reflect changes in NEVLEC's operational environment, advancements in technology, and evolving regulatory requirements.

The process also involves continuous engagement with stakeholders to ensure that all perspectives are considered, and emerging risks are promptly addressed.

This proactive approach to identifying ESHS risks ensures that NEVLEC can implement effective risk management strategies, maintain compliance with legal and other requirements, and uphold its commitment to protecting the environment and ensuring the health and safety of its employees and the communities it serves.

By using this approach, NEVLEC not only safeguards its operational integrity but also reinforces its reputation as a responsible and sustainable energy services provider.

5.2 Risk Assessment and Mitigation Strategies

The NEVLEC ESHS Policy recognizes that the identification of environmental, social, health, and safety (ESHS) risks is only the first step in a comprehensive risk management process. Effective risk assessment and mitigation strategies are essential to ensure the protection of employees, the public, and the environment.

The following outlines the systematic approach NEVLEC will undertake to assess and mitigate ESHS risks associated with its operations.

5.2.1 Risk Assessment

1. NEVLEC will conduct thorough risk assessments for all new and existing operations, considering potential ESHS impacts.
2. These assessments will be carried out by qualified professionals and will involve:
 - a. Identification of hazards,
 - b. Evaluation of risk levels, and
 - c. Determination of control measures.
3. The risk assessment process will be dynamic, allowing for the integration of new information and the re-evaluation of risks on a regular basis.
4. Special attention will be given to operations with the highest potential to cause significant environmental or social impacts, and these will undergo more detailed scrutiny.

5.2.2 Mitigation Strategies

1. Upon the identification of risks, NEVLEC will develop and implement targeted mitigation strategies.
2. These strategies will aim to eliminate or reduce the risks to acceptable levels, in line with national standards and international best practices.
3. Mitigation measures may include:
 - a. Engineering controls,
 - b. Administrative controls,
 - c. Safe work practices, and
 - d. Use of personal protective equipment.
4. NEVLEC will also establish **Emergency Response Plans** for potential ESHS incidents, ensuring prompt and effective action in the event of an occurrence.

5.2.3 Monitoring and Review

1. The effectiveness of risk mitigation strategies will be monitored through regular inspections, audits, and reviews.
2. NEVLEC will maintain a **Risk Register** to document all identified risks, their assessed levels, and the actions taken to mitigate them.
3. This register will be a living document, updated with the findings from ongoing monitoring activities and the outcomes of periodic reviews.

5.2.4 Stakeholder Involvement

1. NEVLEC is committed to engaging with stakeholders, including employees, local communities, and regulatory bodies, in the risk assessment and mitigation process.
2. Stakeholder feedback will be sought and incorporated into risk management activities, ensuring that diverse perspectives are considered and addressed.

5.2.5 Continuous Improvement

1. NEVLEC will strive for continuous improvement in its risk management practices, learning from both internal experiences and external developments.
2. Lessons learned from incidents, near-misses, and stakeholder engagements will be integrated into future risk assessments and mitigation strategies.

In conclusion, NEVLEC's approach to risk assessment and mitigation is rooted in a **commitment to safety, environmental stewardship, and social responsibility**.

Through a proactive and participatory process, NEVLEC aims to minimize ESHS risks and foster a culture of continuous improvement in its operations.

5.3 Risk Communication

Effective risk communication is a critical component of the Environmental, Social, Health, and Safety (ESHS) Policy.

NEVLEC's approach to risk communication is designed to ensure that all stakeholders, including employees, contractors, and the community at large, are fully informed about potential ESHS risks associated with our operations and projects.

The following outlines the strategies and methods NEVLEC will employ to communicate risks effectively.

5.3.1 Communication Principles

NEVLEC commits to transparent, timely, and accurate communication of ESHS risks.

Our communication will be accessible, using clear and non-technical language whenever possible to ensure understanding across diverse audiences.

We will respect the cultural, social, and educational backgrounds of our stakeholders in all communications.

5.3.2 Communication Channels

To reach our stakeholders effectively, NEVLEC will utilize a variety of communication channels. These will include but are not limited to:

- Internal briefings,
- Training sessions,
- Public meetings,
- Social media,
- Press releases, and
- Company website.

We will also establish a dedicated communication team responsible for managing and disseminating information.

5.3.3 Stakeholder Engagement

Active engagement with stakeholders is essential for effective risk communication.

NEVLEC will regularly engage with stakeholders to discuss ESHS risks and gather feedback on our communication methods.

This engagement will help us refine our communication strategies and ensure that stakeholders' concerns are addressed.

5.3.4 Emergency Communication

In the event of an ESHS incident, NEVLEC will implement an **Emergency Communication Plan**.

This plan will outline the procedures for immediate and ongoing communication during and after an incident.

The goal is to provide stakeholders with up-to-date information, reducing uncertainty and enabling a coordinated response.

5.3.5 Monitoring and Review

NEVLEC will monitor the effectiveness of our risk communication efforts through regular reviews and stakeholder feedback.

We will adjust our communication strategies as needed to improve our reach and impact.

This process of continuous improvement will ensure that our risk communication remains effective over time.

NEVLEC's risk communication strategy is an integral part of our commitment to ESHS excellence. By adhering to these principles and practices, we aim to foster a culture of safety, awareness, and proactive risk management within our organization and the communities we serve.

6 Operational Controls

6.1 *Environmental Management*

NEVLEC is committed to environmental stewardship and sustainable practices. This commitment is reflected in our comprehensive waste management and resource use policies, which are designed to minimize environmental impact and promote efficiency.

6.1.1 Waste Management

NEVLEC shall implement waste management practices that prioritize waste prevention, reduction, reuse, and recycling. We will ensure proper disposal of waste materials in accordance with national regulations and strive to find innovative solutions for waste challenges.

6.1.2 Resource Use and Efficiency

We will continuously seek ways to improve our resource efficiency, including the conservation of water and energy.

NEVLEC will invest in technologies and practices that reduce our environmental footprint and promote the sustainable use of natural resources.

6.2 *Social Engagement and Community Health*

NEVLEC recognizes the importance of social engagement and its impact on community health.

We are dedicated to building strong relationships with the communities we serve.

6.2.1 Community Engagement

We will engage with local communities to understand their needs and concerns.

NEVLEC will work collaboratively with community leaders and members to foster mutual trust and respect.

6.2.2 Impact Assessment

Before the initiation of any project, NEVLEC will conduct thorough impact assessments to evaluate potential social and health effects on the community.

We will take proactive measures to mitigate any negative impacts and enhance positive outcomes.

6.3 Occupational Health and Safety

The health and safety of our employees and contractors are paramount.

NEVLEC will adhere to the highest standards of occupational health and safety to provide a safe work environment.

6.3.1 Workplace Safety

We will establish safety protocols and procedures to prevent workplace injuries and illnesses.

Regular safety training and drills will be conducted to ensure that all employees are prepared for potential hazards.

6.3.2 Health Surveillance

NEVLEC will implement health surveillance programs to monitor the well-being of our employees.

These programs will help in the early detection of occupational diseases and the implementation of appropriate interventions.

This section of the ESHS Policy outlines the operational controls that NEVLEC will implement to manage environmental, social, health and safety risks effectively.

Through these controls, NEVLEC demonstrates its unwavering commitment to environmental sustainability, the well-being of its workforce, and the health and prosperity of the communities it serves.

The policies and procedures detailed herein are integral to NEVLEC's operations and reflect our dedication to excellence in environmental, social, health, and safety standards.

7 Project Management and Implementation

7.1 *Overview of Renewable Energy Projects*

NEVLEC's commitment to sustainable development is exemplified through our diverse portfolio of renewable energy projects.

Our initiatives in geothermal energy will harness the natural heat of the earth, providing a reliable and constant power source that significantly reduces our carbon footprint.

The development of wind and solar power will further diversify our energy matrix, contributing to energy security and enabling us to meet our renewable energy targets.

7.1.1 **Geothermal Energy Initiatives**

The geothermal energy initiatives are a cornerstone of NEVLEC's renewable energy strategy. By tapping into geothermal resources, we aim to provide a stable and sustainable energy supply that will serve the community for generations.

The projects are being designed with the utmost consideration for environmental impact, ensuring that the natural beauty and biodiversity of Nevis are preserved.

7.1.2 **Wind and Solar Power Developments**

Our wind and solar power developments are pivotal in the transition towards a greener energy sector. These projects will not only contribute to reducing greenhouse gas emissions but also demonstrate NEVLEC's innovative approach to addressing the challenges of climate change.

Through strategic planning and implementation, these renewable sources will be integrated into our existing infrastructure, promoting a balanced and resilient energy network.

7.2 *Infrastructure Development*

Infrastructure development is key to the successful integration of renewable energy sources. Upgrades to the transmission system are essential to handle the increased load and variability of renewable energy.

The establishment of submarine cable links is a testament to NEVLEC's vision of interconnectivity and regional cooperation, ensuring energy can be shared and supported across borders.

7.2.1 **Transmission System Upgrades**

The transmission system upgrades are a critical component of our infrastructure development. These enhancements are designed to improve the resilience, reliability

and efficiency of electricity distribution, minimizing energy loss and ensuring that the benefits of renewable energy are fully realized.

7.2.2 Submarine Cable Links

The submarine cable links represent a groundbreaking step towards regional energy integration. By connecting Nevis with Saint Kitts and other neighboring islands, these cables not only provide a backup power source but also facilitate the potential export of surplus renewable energy, fostering economic growth and regional solidarity in energy provision.

7.3 Project Lifecycle Management

Effective project lifecycle management is vital to the success of our renewable energy projects. From the initial planning and design phases to construction and commissioning, each step is meticulously managed to ensure adherence to ESHS standards and alignment with international best practices.

During the operation and maintenance phase, we prioritize the longevity and efficiency of our installations, guaranteeing that they continue to deliver clean energy to the community.

7.3.1 Planning and Design

The planning and design phase of our projects is guided by a comprehensive understanding of environmental, social, and health and safety considerations.

By involving stakeholders early in the process and conducting thorough environmental and social impact assessments (ESIAs), we ensure that our projects are not only viable but also beneficial to the community and the environment.

7.3.2 Construction and Commissioning

The construction and commissioning of renewable energy projects are carried out with precision and care. We employ advanced technologies and best practices to minimize disruption and ensure a smooth transition into operational status.

Our commitment to safety and quality is unwavering, as we strive to set a benchmark in the industry.

7.3.3 Operation and Maintenance

The operation and maintenance of our energy projects are conducted with an emphasis on sustainability and efficiency. Regular monitoring and maintenance schedules are established to prevent downtime and extend the lifespan of our installations. Through continuous improvement and innovation, we aim to optimize performance and maintain our role as a leader in renewable energy and sustainable development.

This section of the NEVLEC ESHS Policy outlines the strategic approach to managing projects, emphasizing the importance of sustainability, stakeholder involvement, and adherence to high standards of environmental, social, health, and safety practices throughout the project lifecycle. By implementing these strategies, NEVLEC reaffirms its dedication to advancing the energy sector in a responsible and forward-thinking manner.

8 Emergency Preparedness and Response

The NEVLEC ESHS Policy recognizes the critical importance of being fully prepared for emergency situations to safeguard the health and safety of employees, contractors, and the community, as well as to protect the environment.

This section outlines the company's commitment to establishing robust and effective emergency preparedness and response procedures.

8.1 Emergency Planning

NEVLEC is committed to developing comprehensive Emergency Response Plans that are tailored to the specific risks associated with its operations.

These plans will be regularly reviewed and updated to ensure they remain effective and relevant.

The Emergency Response Plans will include clear procedures for evacuation, sheltering, and lockdowns, and will identify the roles and responsibilities of all employees during an emergency.

8.2 Incident Reporting and Investigation

In the event of an incident, immediate reporting is crucial. NEVLEC will implement a standardized incident reporting system to ensure that all incidents are reported promptly and accurately.

A thorough investigation will follow to identify the root causes and to develop corrective actions to prevent recurrence.

Lessons learned from these investigations will be shared across the organization to improve overall safety.

8.3 Emergency Response Training

To ensure that all employees are prepared to act effectively in an emergency, NEVLEC will provide regular training on emergency response procedures. This training will be mandatory for all new hires and will be refreshed periodically for all staff.

Drills and exercises will be conducted to test the effectiveness of the Emergency Response Plans and the readiness of the team to respond.

Through the implementation of this policy, NEVLEC aims to minimize the impact of emergency situations and ensure a coordinated, efficient, and effective response.

The safety of our people and the protection of the environment are paramount, and this policy serves as a testament to NEVLEC's unwavering commitment to these principles.

9 Monitoring and Measurement

9.1 Performance Indicators

The NEVLEC ESHS Policy establishes specific performance indicators to measure the effectiveness of environmental, social, health, and safety management. These indicators are designed to provide a clear and quantifiable measure of performance against ESHS objectives and targets. They will be regularly reviewed and updated to ensure they remain relevant and aligned with the evolving nature of NEVLEC's operations and projects.

9.2 Auditing and Reporting

Regular audits will be conducted to assess compliance with the ESHS Policy, identify areas for improvement, and ensure that the policy is being effectively implemented.

Audit findings will be reported to senior management and will form the basis for developing action plans to address any identified issues.

NEVLEC is committed to transparency and will publicly disclose summaries of audit outcomes and progress towards ESHS objectives.

9.3 Data Management

Effective data management is crucial for monitoring ESHS performance.

NEVLEC will establish and maintain a robust data management system to collect, store, and analyze ESHS data.

This system will ensure data accuracy, facilitate trend analysis, and support informed decision-making.

Data privacy and security will be paramount, with appropriate measures in place to protect sensitive information.

Through these measures, NEVLEC aims to foster a culture of continuous ESHS performance improvement, ensuring that all activities are conducted in a manner that is safe, environmentally responsible, and socially conscious.

10 Review and Continuous Improvement

10.1 Policy Review Process

The NEVLEC ESHS Policy is a living document that requires regular review to ensure its relevance and effectiveness in addressing environmental, social, health, and safety concerns. The policy review process will be conducted annually or as needed in response to significant operational changes, legal requirements, or stakeholder feedback.

This process will involve a comprehensive evaluation of the policy's content, implementation success, and areas for improvement.

The review will be carried out by a dedicated committee, which will include representatives from various departments to ensure a holistic approach.

10.2 Corrective and Preventive Actions

In the event of non-compliance with the ESHS standards, NEVLEC will take immediate corrective actions to rectify the situation. These actions will be documented and analyzed to prevent recurrence.

Preventive measures will also be identified and implemented to mitigate potential risks. The effectiveness of these actions will be monitored, and adjustments will be made as necessary to ensure continuous improvement in ESHS performance.

10.3 Continuous Improvement Strategies

NEVLEC is committed to continuous improvement in its ESHS practices. This commitment will be demonstrated through the setting of progressive ESHS objectives and targets, informed by the latest industry developments and stakeholder expectations.

The organization will foster a culture of innovation, encouraging employees to suggest improvements and participate in ESHS initiatives. Continuous improvement will also be supported by investing in training, technology, and systems that enhance NEVLEC's ESHS performance.

The integration of this section into the NEVLEC ESHS Policy ensures that the organization remains proactive in its approach to environmental, social, health, and safety matters. By regularly reviewing its policies, taking corrective and preventive actions, and striving for continuous improvement, NEVLEC demonstrates its unwavering commitment to excellence in ESHS management.

This section aligns with the overarching goals of the policy, reinforcing NEVLEC's dedication to sustainability and the well-being of its employees, customers, and the broader community.

11 Stakeholder Engagement

11.1 Public Disclosure and Transparency

NEVLEC is committed to maintaining the highest standards of transparency and public disclosure. This commitment ensures that all stakeholders, including customers, employees, and the broader community, are well-informed about NEVLEC's activities and the potential impacts of its operations.

To this end, NEVLEC will regularly publish reports on its environmental, safety, health, and social initiatives, performance metrics, and adherence to ESHS standards.

These reports will be made available through multiple channels to ensure accessibility and will include comprehensive data to provide a clear and honest overview of the company's ESHS performance.

11.2 Grievance Mechanism

NEVLEC recognizes the importance of providing a formal process for stakeholders to express concerns or grievances related to the company's ESHS practices.

A structured grievance mechanism will be established to address such concerns promptly and fairly.

This mechanism will be designed to be user-friendly, confidential, and accessible to all stakeholders, ensuring that grievances are logged, investigated, and resolved in a transparent and timely manner.

NEVLEC will also provide regular updates on the status of grievances and the outcomes of any investigations.

11.3 Stakeholder Communication

Effective communication with stakeholders is vital to the success of NEVLEC's ESHS policy. NEVLEC will engage with stakeholders through various platforms, including community meetings, surveys, and digital communication channels.

These interactions will aim to gather feedback, understand stakeholder expectations, and foster collaborative relationships.

NEVLEC will also provide training and resources to its employees to enhance their communication skills and ensure that stakeholder engagement is conducted in a respectful and constructive manner.

This section of the NEVLEC ESHS Policy outlines the company's approach to stakeholder engagement, emphasizing transparency, responsiveness, and open communication. By implementing these practices, NEVLEC aims to build trust and create a positive impact on the community and the environment.

12 Appendices

12.1 Relevant International Guidelines and Standards

This section outlines the Relevant International Guidelines and Standards that inform and guide the company's commitment to upholding the highest ESHS standards. It section serves as a reference point for the international frameworks and best practices that NEVLEC aligns with, ensuring that its operations not only comply with national legislation but also resonate with global sustainability goals.

The international guidelines and standards considered include, but are not limited to, the International Labour Organization (ILO) conventions, which set the international legal framework for rights at work and fair labor standards. NEVLEC's adherence to these conventions ensures the protection of workers' rights and the promotion of safe and secure working environments.

Additionally, the World Bank Group's Environmental, Health, and Safety Guidelines provide a comprehensive set of performance standards that NEVLEC incorporates into its operational controls and risk management strategies. These guidelines are instrumental in helping NEVLEC manage environmental risks, enhance health and safety measures, and engage with communities in a socially responsible manner.

Moreover, the International Finance Corporation's (IFC) Performance Standards on Environmental and Social Sustainability establish expectations of clients regarding the identification and management of environmental and social risks. NEVLEC's alignment with these standards demonstrates its proactive approach to risk assessment, mitigation, and communication, as outlined in sections 5.1 to 5.3 of the ESHS Policy. The company's commitment to continuous improvement and stakeholder engagement, detailed in sections 10 and 11, is further reinforced by its dedication to these international benchmarks.

NEVLEC also considered documents from the Caribbean Development Bank (CDB), the Inter-American Development Bank (IDB), and other relevant international treaties and agreements that influence its legal and regulatory compliance, as mentioned in section 4.2. These references ensure that NEVLEC's projects, particularly those related to renewable energy and infrastructure development (sections 7.1 and 7.2), are designed and implemented in accordance with international best practices and contribute to sustainable development in the region.

This section of the NEVLEC ESHS Policy is a testament to the company's unwavering commitment to environmental stewardship, social responsibility, and the health and safety of its employees and the communities it serves. By aligning with esteemed international guidelines and standards, NEVLEC not only fulfills its policy statement of commitment to ESHS standards (section 2.1) but also positions itself as a leader in sustainable practices within the energy sector.

12.2 References to CDB, IDB, IFC and World Bank Documents

Section 12.2 of the NEVLEC Environmental, Social, Health, and Safety (ESHS) Policy is dedicated to providing references to documents from key financial institutions that set international standards for environmental and social risk management. These documents include guidelines and operational policies from the Caribbean Development Bank (CDB), the Inter-American Development Bank (IDB), the International Finance Corporation (IFC), and the World Bank. The inclusion of these references ensures that NEVLEC's ESHS practices are aligned with globally recognized frameworks and methodologies, which are instrumental in guiding the corporation's approach to managing ESHS risks effectively.

- **The CDB's Environmental and Social Review Procedures (ESRP)** provide a comprehensive framework for the integration of environmental and social considerations into the project cycle, from conception to operation.
- **The IDB's Environmental and Social Policy Framework (ESPF)** outlines the bank's commitment to sustainability and provides a basis for the environmental and social strategies required for the projects it finances.
- **The IFC's Performance Standards on Environmental and Social Sustainability** establish the responsibilities of clients for managing their environmental and social risks.
- **The World Bank's Environmental and Social Framework (ESF)** sets out the bank's requirements for environmental and social due diligence and monitoring.

NEVLEC's adherence to these documents is a testament to its commitment to sustainable development and corporate responsibility. By referencing these documents in the ESHS Policy, NEVLEC demonstrates its dedication to upholding the highest standards of environmental stewardship, social responsibility, and health and safety practices. This alignment not only enhances the corporation's operational integrity but also fosters trust and confidence among stakeholders, including investors, regulatory bodies, and the communities it serves.

Furthermore, this section serves as a resource for NEVLEC's staff, providing them with access to a repository of best practices and benchmarks against which the corporation's ESHS performance can be measured and improved. It also acts as a guide for project managers and other personnel involved in the planning, implementation, and management of projects, ensuring that all activities are conducted in a manner that is respectful of the environment and the well-being of all stakeholders.

The references provided in this section are not only a reflection of NEVLEC's current ESHS commitments but also a roadmap for future endeavors to achieve excellence in environmental and social governance.

12.3 Glossary of Terms

The NEVLEC ESHS Policy is a comprehensive document that outlines the standards and practices to ensure environmental, social, health, and safety (ESHS) compliance within the organization's operations. This glossary provides definitions and explanations for key terms used throughout the policy to ensure clarity and uniform understanding among all stakeholders.

1. **Environmental, Social, Health, and Safety (ESHS):** An inclusive term that refers to the collective considerations of environmental protection, social responsibility, and the health and safety of employees and the communities affected by NEVLEC's operations.
2. **Compliance:** Adherence to laws, regulations, guidelines, and specifications relevant to the organization's activities. This includes national legislation and international agreements that NEVLEC has committed to following.
3. **Risk Management:** The process of identifying, assessing, and controlling threats to an organization's capital and earnings. These threats, or risks, could stem from a wide variety of sources, including financial uncertainty, legal liabilities, strategic management errors, accidents, and natural disasters.
4. **Operational Controls:** The plans, methods, and procedures used to meet ESHS requirements and manage associated risks. This includes the management of waste, efficient use of resources, and ensuring occupational health and safety.
5. **Stakeholder Engagement:** The process by which NEVLEC involves individuals, groups, or organizations who may be affected by or can affect its activities. This is a strategic tool for building partnerships, soliciting expert advice, and developing a transparent and inclusive approach to ESHS issues.
6. **Continuous Improvement:** A method of constantly improving processes, products, or services by making incremental enhancements over time, or significant improvements all at once.
7. **Mitigation Strategies:** Actions taken to reduce the severity, seriousness, or painfulness of something, especially with respect to ESHS risks.
8. **Project Lifecycle Management:** The process of managing the entire lifecycle of a project from inception, through engineering design and manufacture, to service and disposal of manufactured products.
9. **Emergency Preparedness:** The discipline of dealing with and avoiding both natural and man-made disasters. It involves preparedness, response, and recovery in order to lessen the impact of disasters.
10. **Performance Indicators:** Measurable values that demonstrate how effectively an organization is achieving key objectives. In the context of ESHS, these indicators relate

to the organization's impact on the environment, society, and the health and safety of its workforce.

11. **Public Disclosure:** The act of making information or data readily accessible and available to all interested individuals and institutions.

12. **Grievance Mechanism:** A formal, legal or non-legal complaint process that can be used by individuals, workers, communities, and other stakeholders who are being adversely affected by certain business activities and operations.

This glossary is not exhaustive and may be updated periodically to reflect changes in legislation, industry standards, or organizational practices. It serves as a reference tool for all parties involved in the implementation and governance of the NEVLEC ESHS Policy.