

**Summit Power International Limited**  
**Environment, Health, Safety and Social (EHSS) Policy**

## **General Provisions**

### **A. Introduction**

The purpose of this policy is to provide the necessary guidance for which **Summit Power International Limited** (hereinafter the “Company” or “SPI”, and together with its subsidiaries, the “Group”) operates its business in a manner that ensures compliance with local laws and international best practices, good international industry practices (GIIP) and the Group’s Corporate Environmental and Social Management System (ESMS) to achieve its objectives in the area of Environment, Health, Safety and Social (EHSS) and fulfill its social responsibility to its local community, its employees and other stakeholders.

### **B. Environment Policy**

SPI will strive to safeguard the environment and natural resources and promote resource efficiency in its operations. The following will be the core objectives in achieving the above:

#### B1. At the corporate level, the Company endeavors to:

- Fully implement the requirements of Environment Conservation Rules 1997 and its subsequent amendments, any rules, regulations imposed/issued by Department of Environment, Bangladesh and any concerned authority of Bangladesh.
- Fully implement the World Bank Group EHS Guidelines, relevant EHS sector guidelines and the International Finance Corporation (IFC) Performance Standards.
- Ensure compliance with the Asian Development Bank (ADB) Safeguard Policy which is consistent with the provisions of our Corporate ESMS.
- Assess and manage the adverse environmental and social impacts in accordance with IFC Performance Standards and with ADB Safeguard Policy Statement for ADB financed projects.
- Ensure that its operations consider the impact on biodiversity and implement appropriate mitigation measures.
- Provide support and assistance to plants and LNG Terminal operations through the Summit Turbine Division and Summit Reciprocating Division to implement the Corporate ESMS.
- Oversee the implementation of the Corporate ESMS and report regularly on the environmental management systems and performance of the power plants and LNG Terminal to the Board.

#### B2. The Group endeavour to provide the following commitments:

- Conduct business in compliance with all applicable environmental laws, regulations

and commitments and seek to apply national/international standards where relevant.

- Make environmental considerations a priority in business planning and in the operation of our power plants and LNG Terminal.
- Review emissions, effluents, noises, wastes and continually strive to reduce their impact wherever feasible.
- Encourage employees and contractors to take individual responsibility for their actions with respect to the environment through appropriate communications and training.
- Ensure preparedness to respond in a timely and appropriate manner to environmental incidents resulting from power plants and LNG Terminal operations.
- Designate one employee of each facility as coordinator to prepare a specific environmental management program for power plant and LNG Terminal with applicable procedures based on the Group's guidelines and the ISO 14001 standard and implement appropriate training and record keeping.
- Set annual environmental objectives and targets and commit to continuous improvement.
- Demonstrate visible leadership, commitment and involvement towards achieving the Company's E&S objectives.
- Carry out an audit and management review of environmental management system at least once every two years.

### **C. Social Policy**

The Company is committed to address and recognise its social responsibility within its sphere of influence. The Company will contribute and respond immediately where there are scopes of social progress within its sphere of influence.

#### **C1. Reference Frame**

In appraising all its power plants and LNG Terminal, the Company will be guided by the standards resulting from the following laws, statute conventions, principles, standards and its Corporate ESMS:

- Environmental Conservation Rules 1997 and its subsequent amendments, any rules, regulations imposed/issued by Department of Environment, Bangladesh and any concerned authority of Bangladesh.
- Corporate Social Responsibility (CSR) of the Group;
- The standards of World Bank Group (EHS General Guidelines, and relevant sector guidelines) and in particular, the IFC Performance Standards 2012.
- ADB Safeguard Policy Statement for ADB financed projects;
- ADB Social Protection Strategy (2001), ADB Gender and Development Policy (1998); and
- ADB Public Communications Policy (2011).

#### **C2. The policy should be implemented to:**

- Ensure that full compensations and benefits are given to project displaced and affected persons which they are entitled to.
- Identify and engage community and different levels of stakeholders.
- Address and proper management of any sort of grievances resulting from the construction and operation works of the company.
- Restore the livelihood of the Project Affected People (PAP), vulnerable groups within the area of influence of the Company.
- Enhance the economic status of the community by providing means of income and support.
- Participate within the process of women empowerment by introducing new programs dedicated to community women.
- Maintain an effective practice of Community Consultations and Participation so that the communication and channel with the community is adequately maintained. The practice of Informed Consultations and Participation (ICP) can be a key to this process.
- Prioritize the community people in the case of any decision making process.
- Introduce and perform regular monitoring and review system to address the effectiveness of the policy.

### C3. Additional Considerations

In the event of any emergency including national emergencies (such as floods, earthquakes, fire, pandemic, epidemic, endemic, outbreak etc.), or occurrence of any event which poses greater threat to the society, the Company shall respond immediately and may go beyond the usual practice under its Social Policy in consonance with broader corporate social responsibility.

## **D. Health and Safety Policy**

The Company will manage its power plants and LNG Terminal operations in a manner that protects the health and safety of its employees, customers, contractors and the public, while fully complying with its applicable laws, regulations and standards to which the asset facilities subscribe. SPI will strive to continuously improve Health and Safety Performance with a goal of zero incidents by following good international industry practices (other local laws, IFC Performance Standards and relevant EHS Guidelines), maintaining industrial hygiene & best process/practices of occupational health & safety and its Corporate ESMS. The following will be the core principles in achieving the above.

### D1. Guiding Principles

The guiding principles shaping the Health and Safety Policy will be as follows:

- Full implementation of the requirements of the Environment Conservation Rules 1997 and its subsequent amendments, any rules, regulations imposed/issued by Department of Environment, Bangladesh and any concerned authority of Bangladesh.

- Fully implement the World Bank Group EHS Guidelines, relevant EHS sector guidelines and the IFC Performance Standards.
- Implement the requirement of the Bangladesh Labor Law 2006, Labor rules 2015 and subsequently amendments issued by Legislative and Parliamentary Affairs Division of the Bangladesh Government.
- ADB financed projects will fully comply with ADB Safeguard Policy Statement; Health and Safety excellence is mandatory of our long-term success.
- Health and Safety excellence requires the commitment and personal involvement of all levels of management and all employees.
- Employees have the obligation and the ability to prevent accidents.
- Incidents and non-compliance are unacceptable.
- All employees and contractors are responsible and accountable for understanding and complying with all regulations, company requirements and procedures relating to their job performance.

D2. The Company is committed to:

- Improve Health and Safety compliance and performance through the implementation of Occupational Health and Safety Management Systems which will be conformant to ISO 45001 (OHSAS 18001) standards.
- Integrate Health and Safety concerns into all business and operational planning and decision making.
- Provide a safe work environment and training for all employees related to Health and Safety.
- Achieve upper quartile performance in all key Health and Safety metric for the industry in which we operate.
- Involve the same level of commitment and performance for contractors that work in our facilities as we do from our employees.
- Utilize materials, natural resources and energy efficiently to produce our product and service.
- Respond in a timely and appropriate manner if an incident/accident resulting from operations does occur.
- Work proactively with legislators, regulators, concerned groups and industry peers to develop and advance effective approaches to human health and safety protection.
- Communicate regularly on Health and Safety issues, expectations and performance with employees, contractors, customers and regulators and to management and all concerned of any unlawful or unsafe work conditions, other lapses including those of security.
- Demonstrate visible leadership, commitment and involvement towards achieving the Company's H&S objectives.
- Ensure availability of effective crisis management and emergency response capabilities to respond to incidents and/or situation akin to emergency across our power plants and LNG Terminal facility.

- Audit assets and operating practices regularly, and take appropriate corrective actions.

#### **E. Policy Review**

This Policy takes effect as of the date of approval, or date of effectiveness determined, by the Company in a Board meeting.

This Policy shall be reviewed annually to ensure its relevance to current practices and law. The Board of Directors shall be responsible for ensuring this policy is current.