

## Environmental and Social Review Summary (ESRS) Kuldipsingh Port Expansion Project – SURINAME

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### 1. General Information of the Project and Overview of Scope of IDB Invest’s Review

Kuldipsingh Port Facility N.V. (“KPF”, the “Client,” or the “Company”) operates a multipurpose cargo terminal supporting offshore oil and gas logistics, and imports of construction materials for various sectors. It is the operator of a privately owned port in Wanica, Suriname. The proposed investment (the “Project” or “Phase 2”) aims to provide additional financing for the Company’s existing transaction<sup>1</sup> (“Phase 1”) towards increasing infrastructural capacity and improving overall operational performance. This includes: i) expanding the existing quay by an additional 80 meters (260 feet) to accommodate a higher volume of vessels; and ii) rehabilitating an old wharf at another site to streamline direct logistical management by the Company.

The environmental and social due diligence (“ESDD”) process included: i) a visit to the Project site; ii) follow-up interviews and meetings with designated environmental personnel of the Company; and iii) a review of environmental and social (“E&S”), and occupational health and safety (“OHS”) information submitted by the Client as part of the required annual reports to IDB Invest.

To ensure the Project’s commitment to respect and protect human rights, its zero tolerance for retaliation, and its commitment to providing and guaranteeing a safe environment for workers and stakeholders to voice their concerns without fear of retaliation, the ESDD process also included the review of the Client’s following documents: i) Code of Ethics and Conduct; ii) Grievance Policy and Mechanism; iii) Personnel Handbook; iv) Whistleblowing Policy; v) Employment Ethics Policy; and vi) Privacy Policy.

### 2. Environmental and Social Categorization and Rationale

The Project has been classified as a Category B operation in accordance with IDB Invest’s Environmental and Social Sustainability Policy, since it will likely generate, among others, the following impacts: i) increased operational health and safety (“OHS”) risks during construction; ii) possible water and soil contamination due to hazardous chemicals storage and bulk transfer of fuel and other materials or associated activities; iii) traffic disturbance; iv) dust and noise emissions; and v) water contamination due to discharges of untreated stormwater and dredge works. These impacts are deemed to be of medium intensity, are generally limited to the Project sites, largely reversible and can be mitigated via measures that are readily available and feasible to implement in the context of the operation.

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<sup>1</sup> <https://idbinvest.org/en/projects/kuldipsingh-port-expansion-project-suriname>

The Performance Standards (“PS”) triggered by the Project are: i) PS1: Assessment and Management of Environmental and Social Risks and Impacts; ii) PS2: Labor and Working Conditions; iii) PS3: Resource Efficiency and Pollution Prevention; and iv) PS4: Community Health, Safety, and Security.

### **3. Environmental and Social Context**

#### **3.1 General characteristics of the Project’s site**

KPF, one (1) of eleven (11) companies in the Kuldipsingh Group (the “Group”), is located in the center of the Wanica district of Paramaribo city, Suriname, about 700 metres (0.4 miles) upstream from the country’s main port<sup>2</sup> in the Suriname river.

The Project consists of two (2) sites: i) Site 1 – a brownfield expansion of the existing port facility which is situated on an industrial area where other companies (including “Staatsolie”, the main state-owned refinery) have been in operation for many years. The land for the port facility is privately owned by the Group with ongoing development; and ii) Site 2 – situated within a mixed-use area which includes residences and commercial infrastructure. It is located approximately 22 km (13 miles) southeast of the current port on a parcel covering 4.7 hectares (11.6 acres). The property is part of a non-operational industrial compound housing an old wharf with several quay-side infrastructure surrounded by secondary low-lying vegetation.

#### **3.2 Contextual risks<sup>3</sup>**

Suriname is considered a small, open, commodity-based economy which is vulnerable to external shocks. The extractive sector (mainly gold and oil) accounts for most of its exports, generating approximately 86 % of the country’s foreign exchange earnings and 25 % of government revenues.

Private sector development continues to be challenged by an unfavorable business environment and is constrained by several structural factors such as an underdeveloped financial sector, inadequate human capital, insufficient public infrastructure, low adoption of technology, and several outdated laws that are in need of modernization.

Poverty and inequality remain relatively high,<sup>4</sup> and basic services are characterized by unequal access, reliability challenges, and governance and institutional capacity constraints which hinder social development.

The country has no specific legislation concerning environmental protection or waste management. Household waste collection is limited (63% of households) and it is often sent to the public landfill. The central area of Paramaribo has a combined rainwater-sewage collection system built in the 1940’s. Wastewater management is therefore limited as most of the pipelines are outdated. As

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<sup>2</sup> <https://www.dpworld.com/en/ports-terminals/suriname/paramaribo>

<sup>3</sup> [IDB Group Country Strategy with Suriname \(2021–2025\); Suriname Country Development Challenges Update \(CDC Update\), April 2020](#)

<sup>4</sup> Overall poverty rate estimated at 21.2% – much higher figures (47.9%) are noted in the interior region, with almost 1 in every 2 households being classified as poor

there is no treatment of sewage before disposal into the environment, the sewer system (including areas where an enclosed sewer system does not exist) discharges untreated waste directly into the Suriname River via electrically driven pumps. The same applies to septic tank effluent which is removed using vacuum trucks and dumped untreated directly into the river.

The country denotes differences in access to electricity between the urban and rural areas whereby the national grid does not adequately reach customers in the Hinterland. Additionally, electricity tariffs do not cover full cost recovery, and institutional weakness affects the sector's ability to provide a reliable service.

The quality and coverage of transport infrastructure is also poor compared to sub-regional neighbors. Only 56% of the existing roads are paved.<sup>5</sup>

Though there has been an uptick in petty crimes such as break ins over the past five years, crime data reflect that the country is generally considered safe, with a relatively low overall crime rate compared to the global average and similar nations.<sup>6</sup> Notwithstanding, corruption and bribery score high on the index.<sup>7</sup> The country has also been identified as a major trans-shipment point for illegal gold mining, money laundering, and drugs and human trafficking. Child labor and associated commercial sexual exploitation, especially in small-scale gold mines, is also a concern.<sup>8</sup>

#### **4. Environmental Risks and Impacts and Proposed Mitigation and Compensation Measures**

##### **4.1 Assessment and Management of Environmental and Social Risks**

###### 4.1.a E&S Assessment and Management System

The Project is required by the national legislation to have a construction permit. The port has a full operating license and is certified by the International Ship and Port Facility Security Code, and under ISO 14001:2015

The Company has an integrated environmental and social management system ("ESMS") applicable to port construction and operation activities which identifies required personnel, responsibilities, estimated operational budget, and a management and tracking system to ensure continuous improvement. It will present an external and internal audit report on the implementation of the ESMS.

###### 4.1.b Policy

KPF has a "*Health, Safety, Environmental, and Quality Policy Statement*" which was updated and converted into an environmental and social ("E&S") policy.

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<sup>5</sup> The country ranked 81 out of 144 countries evaluated in the pillar of overall infrastructure and lags its Caribbean peers in airport infrastructure at position 104.

<sup>6</sup> e.g., violent crime such as homicide and assault is rare averaging 5 per 100,000 residents).

<sup>7</sup> [Latam Living Cost](#)

<sup>8</sup> [Organized crime index](#)

#### 4.1.c Identification of Risks and Impacts

The Company enhanced its risk-based assessment matrix to include impacts and risks produced by activities to be undertaken by clients, contractors, and primary suppliers on the project site. An updated matrix and risk assessment will be prepared for the Project.

Maintenance dredging is conducted at the port annually or when necessary. Dredging will be required at Site 2 along with a demolition of existing marine structures.

The Client will therefore prepare: i) a Construction Management Plan; ii) a Dredging Plan; and iii) a cultural assessment specific to Site 2.

##### 4.1.c.i Direct and indirect impacts and risks

Potential direct risks and impacts due to expansion activities and linked to with daily operations may include: i) increased OHS risks during construction (e.g., accidents involving workers); ii) noise and vibration disturbance from equipment or pile driving; iii) reduced air quality from dust emissions; iv) impacts to the water quality and sedimentation of Suriname River linked to dredge works, spillage of hazardous substances or fuel, and storm water runoff; and v) possible disturbance to cultural remnants. A potential indirect impact includes traffic disturbance linked to increased vehicular activity resulting in mobility restrictions for the surrounding local communities.

##### 4.1.c.ii Analysis of alternatives

Given that the Project is brownfield and that its main objective is to enhance operations and infrastructure within existing property boundaries earmarked for industrial activities, no alternative analysis from the E&S perspective was needed.

##### 4.1.c.iii Cumulative impact analysis

KPF will provide a status report on the waste management plant proposed in Phase 1.<sup>9</sup> The report will include the status concerning: i) gas emissions; ii) waste production (including wastewater); and iii) safe disposal of incinerated ash.

##### 4.1.c.iv Gender risks

According to a recent report by the International Monetary Fund (“IMF”)<sup>10</sup>, education outcomes for both men and women in Suriname fall short of those in Latin America and the Caribbean (“LAC”). Though female labor force participation rate has increased compared to that of males, the gap remains sizable, and women who are employed are more likely to work part-time. Child marriage is prevalent and contributes to increased rates of adolescent pregnancies with higher health risks – it also noted as limiting educational attainment and labor market participation. Gender based violence (“GBV”) remains a widespread issue across the country. Though access to electricity and safe

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<sup>9</sup> The ESCR for 2025 notes a partnership with the company Geochem which is operating the waste management plant on KPF's premises

<sup>10</sup> <https://www.elibrary.imf.org/downloadpdf/view/journals/002/2025/012/article-A001-en.pdf>

drinking water has improved, significant gaps remain in rural areas which disproportionately affect women.

Within this context, gender-related risks associated with the Project are considered low. The quay expansion or wharf rehabilitation is not expected to have differentiated adverse impacts on women or other vulnerable groups. Positive impacts anticipated from the expansion activities includes the creation of additional job opportunities.

#### 4.1.c.v Gender Programs

The Company has a total of twenty-four (24) women which account for 14.11 % of the work force (four (4) hold senior positions). Women do not operate heavy machinery at the port. Though there are separate restroom facilities, there are no lactation rooms for breastfeeding workers.

It is anticipated that women will make up approximately 3% of the primary workforce (4% contracted labor if required) at the new port location.

Under its Code of Ethics and Conduct, KPF strictly prohibits all types of harassment, including sexual harassment. The Company's Whistler Blower and Grievance Policies also provide channels to address harassment. However, there is no reference to GBV. The respective policies apply to all employees, contractors, consultants, suppliers, and external stakeholders.

To enhance and ensure adequacy of gender programs, the Client will update its applicable policies to include GBV and provide to its personnel formal gender training and sensitization.

#### 4.1.c.vi Climate change exposure

Suriname experiences two (2) wet seasons: a major between May and July (250 - 400 mm rainfall per month), and a minor from November to January (150 - 200 mm of rainfall per month). There are also two dry seasons (February-April and August to December) averaging 100mm or less of rainfall per month.

Given the country's location, south of the hurricane belt, it is not exposed to this hazard.<sup>11</sup> It is, however, considered one of the most vulnerable countries in the world to natural disasters and climate change, since 90% of its population is located on the coastline of Paramaribo, much of which is on land less than 10 meters (33 feet) above sea level. As such, it is highly exposed to sea level rise ("SLR").<sup>12</sup> The greater Paramaribo area, including its World Heritage Site, is also not adequately prepared for coastal and inland flooding.<sup>13</sup>

Overall, climate change is likely to exacerbate the country's vulnerability and negatively affect the agriculture, water (e.g. groundwater recharge), energy, health, and tourism sectors. Given that inadequate and poorly maintained drainage systems currently contribute to flooding, increasing

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<sup>11</sup> [World Bank Climate Change Knowledge Portal](#)

<sup>12</sup> World Bank data (2017) noted that the SLR was at least 20cm over the last two decades.

<sup>13</sup> Estimates show that for 2050 a 10-year return period coastal flooding event will generate an inundated area that is twice bigger than the normally actual flooded area.

variability and severity in precipitation is therefore likely to increase flood risk and SLR thus placing pressure on the country's coastal defenses, land drainage, housing, and overall infrastructure.<sup>14</sup>

The primary hazards identified for the Project are therefore related to SLR and flooding. Given the use of proceeds, the exposure profile for the Project is classified as moderately to highly exposed to physical climate-related hazards. Therefore, the Client will ensure the Project design includes adequate mitigation and adaptation measures to offset potential impacts primarily due to risk from SLR and flooding.

The Project is considered Paris Agreement aligned based on the analysis conducted in accordance with the IDB Group Paris Alignment Implementation Approach.

#### 4.1.d Management Programs

Following its obligations under Phase 1, the Company now requires a job hazards analysis ("JHA") and approval of a work permit prior to engaging in its daily operations. It has also: i) updated its permit to work system ("PWS")<sup>15</sup> which is disseminated to all workers; and ii) developed and implemented a Contract's HSE Management Program which was integrated into the ESMS.

Though a recent Dredging Plan (2025) was prepared for maintenance dredging at the port, it does not include key details specific to: i) dredge volume; ii) baseline bathymetry and target design depths; iii) approved disposal site; iii) sediment classification of sediment (clean vs contaminated); and iv) reuse assessment.

The Client will submit: i) A detailed annual report on the JHA's implementation; and ii) revised maintenance Dredging Plan for existing port operations.

#### 4.1.e Organizational Capacity and Competency

The Company has designated HSE-Q personnel to manage E&S matters at the Port.

#### 4.1.f Emergency Preparedness and Response

KPF updated its Emergency Management and Response Plan ("EMRP") to adequately identify: i) areas prone to accidents and emergency situations; ii) communities and individuals that may result impacted as a consequence of an emergency situation; iii) response procedures; iv) equipment and resources needed in an emergency; v) people in charge of managing emergency situations; vi) responsibilities of the people in charge of the emergencies; vi) communication channels, including those with potentially affected communities; and v) training and drills to ensure effective response. These will be adopted for Site 2 as relevant.

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<sup>14</sup> [IDB Group Country Strategy with Suriname \(2021–2025\); Suriname Country Development Challenges Update \(CDC Update\), April 2020](#)

<sup>15</sup> The PWS presents procedures for non-routine or potentially hazardous work performed by employees or contractors

#### 4.1.g Monitoring and Review

The Company has an established HSE monitoring program to guide operations, along with a matrix for regulatory requirements and contractual obligations which is regularly updated.

#### 4.1.h Stakeholder Engagement

KPF developed a formal Stakeholder Engagement Plan (“SEP”) which outlines the main stages of the process of engagement with the community and other project stakeholders during the operation of the port, or when the implementation of a specific project is required.

#### 4.1.h.i Disclosure of Information

The Company has a dedicated group website<sup>16</sup> with brochures for each operational area including the Port.<sup>17</sup> Alongside an app and several social media platforms, these mediums are used to share information on the Company and its services.

#### 4.1.i External Communication and Grievance Mechanisms

External communications are centered around the group website and Facebook accounts which include associated telephone contact and email information. The Grievance Policy and Mechanism addresses external grievances. A grievance program with a dedicated ethics email was recently implemented to enable submission of anonymous grievances.

## 4.2 Labor and Working Conditions

#### 4.2.a Working Conditions and Management of Worker Relationships

The Company has 170 employees (88% men and 12% women).<sup>18</sup> KPF’s primary oversight is via its Chief Executive Officer (“CEO”). As part of its new organization structure in 2024, there are eight (8) departments (with four sub-departments)<sup>19</sup> which includes Health, Safety, Environment and Quality (“HSE-Q”) led by an HSE-Q manager.

Normal workdays are from Monday to Saturday although, in some cases, this schedule may vary according to the port’s needs. There are also two (2) work shifts.<sup>20</sup>

The Personnel Handbook will be updated to include general work hours for the port.

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<sup>16</sup> <https://kuldipsingh.net/en/#port>

<sup>17</sup> [https://www.kuldipsingh.net/wp-content/uploads/2023/11/Kuldip\\_folder\\_KPF\\_2023\\_online\\_ENG.pdf](https://www.kuldipsingh.net/wp-content/uploads/2023/11/Kuldip_folder_KPF_2023_online_ENG.pdf)

<sup>18</sup> 150 men; 20 women

<sup>19</sup> These are: i) operations (manpower; equipment; maintenance and equipment) ii) logistics; iii) HSE-Q (waste management); iv) engineering; v) payroll; vi) agency; vii) project team; viii) security

<sup>20</sup> From 7.00 am to 19.00 pm and second shift from 19:00 pm to 6.00 am (each with one-hour break).

#### 4.2.a.i Human Resources Policies and Procedures

Several HR policies and corresponding procedures were developed under Phase 1. These include the Personnel Handbook and policies specific to: i) a Grievance Mechanism; ii) Code of Ethics and Conduct; iii) a Whistle Blowing Procedure; iv) Employment Ethics Guidelines; v) Drugs and Alcohol; vi) Health and Safety (“H&S”); vii) Conflict of Interest Guidelines; and viii) Anti-Bribery and Anti-Corruption.

#### 4.2.a.ii Working Conditions and Terms of Employment

Employment conditions are guided primarily by the Personnel Handbook, Code of Ethics and Conduct, and H&S Policy in accordance with local labor regulations under the Civil and Labor Codes.

#### 4.2.a.iii Workers’ Organizations

Suriname has ratified the International Labor Organization’s (“ILO”) Convention No. 87 Freedom of Association and Protection of the Right to Organize and No. 98 on Right to Organize and Collective Bargaining. Since no specific declaration concerning freedom of association has been included in the Personnel Handbook, the Client will update this document to reference collective bargaining and the right to freedom of association.

#### 4.2.a.iv Non-discrimination and Equal Opportunity

The Company’s Code of Ethics and Conduct outlines that *“every employee is entitled to fair and respectful treatment, and KPF unequivocally prohibits any form of discrimination or harassment towards employees, contractors, suppliers, customers, or any other parties with whom it engages.”*

Additionally, it notes that it is a violation *“to discriminate in employment opportunities or work conditions based on an individual’s race, color, national origin, age, religion, disability status, gender, sexual orientation, gender identity, genetic information, marital status, or any other factors prohibited by applicable laws.”*

The Company *“values differences in gender, race, ethnicity, religion, sexual orientation, culture, style, thought, and experience among its employees.”*

#### 4.2.a.v Retrenchment

No jobs will be lost under the Project and no retrenchment is foreseen.

#### 4.2.a.vi Grievance Mechanism

The Company has developed a formal internal grievance mechanism.

#### 4.2.b Protecting the Workforce

##### 4.2.b.i Child Labor

According to Surinamese legislation, the minimum age for employment is sixteen (16). However, the minimum age of employment for the Company is 18 years. Since there are no provisions against child labor in the actual Client's policies, it will include them in its relevant HR policies or applicable procedures.

##### 4.2.b.ii Forced Labor

Suriname has ratified ILO Convention No. 29 on Forced Labor and Convention No. 105 on Abolition of Forced Labor.<sup>21</sup> Although the Client complies with local labor legislation, there are no provisions against forced labor in its Company policies. Therefore, it will update the relevant HR policies or applicable procedures to include provisions against the use of forced labor.

#### 4.2.c Occupational Health and Safety

The Company developed an OHS Program (applicable to workers, contractors, suppliers, clients and visitors) which: i) identifies measures to address potential hazards to workers associated with main port activities; ii) describes preventive and protective measures (including training) to handle hazardous substances and materials, lifting operations safety, and general waste management; iv) outlines how to document and report occupational accidents, diseases, and incidents; and v) updated the EMRP.

OHS commitments are summarized via the H&S Policy alongside a policy statement. The Code of Code of Ethics and Conduct also requires that employees adhere to all HSE-Q-related policies, procedures, and applicable HSE-related laws, regulations, and Quality standards.

There is a medical emergency response centre and mobile intensive care unit on site.<sup>22</sup>

A semi-annual root cause analysis will be submitted.

##### 4.2.d Provisions for people with disabilities

Given the high-risk nature of the activities involved in the operation of the Port and expansion plans (e.g., heavy lifting, large machinery and equipment usage, high temperatures, dust and noise levels, and working from heights), people with disabilities would be exposed to unwarranted risk. As such, no measures to include people with disabilities have been identified for the Project.

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<sup>21</sup> [ILO Convention No. 29 on Forced Labor; Convention No. 105 on Abolition of Forced Labor](#)

<sup>22</sup> 5 days a week: 8am-4pm

#### 4.2.e Workers Engaged by Third Parties

The Code of Ethics and Conduct “*encompasses all individuals linked to KPF, including employees (regardless of employment type), consultants, contractors, trainees, seconded staff, casual workers, agency staff, interns, board members, agents, and any other persons associated with KPF, including third parties, regardless of their location.*”

There is a Contractor Management Plan which outlines the relationship and responsibilities between contractors and KPF during work activities. It applies to all contractors and service providers carrying out work for the Company. It will be updated to include provisions against the use of child and forced labor.

#### 4.2.f Supply Chain

The Company has several policy documents which guide procurement procedures which include: i) A primary Procurement Policy which *establishes standards for purchasing goods and services, ensuring alignment with the company's values and objectives*; ii) General Conditions for The Procurement of Goods, Services and Works which stipulates obligations of suppliers; and iii) Know Your Customer (“KYC”) which establishes a comprehensive and standardized process for verifying the identity and assessing the suitability of prospective customers.

The Client will update these policies to reflect the prohibition of child and forced labor along its supply chain. These measures will be communicated to relevant third parties such as contractors and sub-contractors.

### **4.3 Resource Efficiency and Pollution Prevention**

#### 4.3.a Resource Efficiency

All raw materials and equipment for the Project will be provided by KPF subsidiaries. Though energy for Site 2 will be from the grid, once operational, environmental initiatives or reduction measures will be implemented.

Several electric forklifts are currently in use at the port, and under Phase 1 the Company prepared an *Energy Management Reduction Program* aimed at reducing the port’s average energy consumption. A report will be submitted on its implementation.

##### 4.3.a.i Greenhouse Gases

The Project will submit its annual inventory of GHG.

##### 4.3.a.ii Water Consumption

Municipal water will be used for the Project. The prescribed stormwater collection will be incorporated as feasible.

For daily port operations KPF will submit a status report on its water monitoring and management plan which will include: i) the identification of major water needs (port and vessels); ii) water use goals; iii) key performance indicators (“KPIs”) against the water goals; and iv) water conservation practices applicable for all employees.

#### 4.3.b Pollution Prevention

KPF has prepared and adopted: i) an ambient air monitoring program; ii) an air quality management plan; and iii) noise monitoring program.

A detailed quantitative ambient air quality and noise monitoring report will be submitted.

#### 4.3.b.i Wastes

KPF’s new organizational structure has waste management included as part of the HSE-Q department. Recyclables are managed in collaboration with a local recycling company.<sup>23</sup>

The Company will submit a report on the implementation of the Project’s Management Plans for Stormwater and Waste Management respectively.

#### 4.3.b.ii Hazardous Materials Management

KPF has a collaboration with the company which operates a waste plant on the premises of the port for the management of hazardous waste.

The Project has also developed a Hazardous Materials Management program (“HMMP”) and implemented a Hazardous Materials Training Program for employees, contractors and clients.

An implementation status report will be submitted.

#### 4.3.b.iii Pesticide Use and Management

The Project will not use any type of hazardous pesticide for its activities.

### **4.4 Community Health, Safety and Security**

#### 4.4.a Community Health and Safety

The Project, as part of Phase I and ISO 14001 and ISO 45001<sup>24</sup> certification requirements, has performed an integrated risk analysis of port operations related to the community. This resulted in: i) development of a Community, Health and Safety Plan to address potential emergency

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<sup>23</sup> [Green Circle Recycling](#)

<sup>24</sup> ISO 14001 for the environmental management system and 45001 for the health and safety system.

situations arising from handling and storage of chemicals; and ii) preparing and adopting an EMRP for fire and explosions.

The Company will adopt these components for Site 2 as applicable.

#### 4.4.a.i Infrastructure and Equipment Design and Safety

Expansion at the port is ongoing catering to several clients with various measures which have enhanced infrastructural integrity, along with an improved stormwater drainage network.

Fire assessment reports are conducted in preparation for new client tenancy agreements to ensure Core fire protection infrastructure is in alignment with internationally recognized fire safety standards. The reports evaluate the adequacy of completed or installed systems including but not limited to: i) fire extinguishers and alarms; ii) smoke detectors; iii) emergency lighting; iv) exit signage and exit doors; v) electrical systems; and vi) escape routes and interconnecting doors.

Development at Site 2 will include: i) a new jetty with designs for a longer and more substantial structure supported by precast concrete piles and a reinforced concrete deck; ii) modern fenders and mooring systems; and iii) new sheet pile walls, anchor walls and anchor rods.

A Flood Mitigation Plan was prepared for the port which identified flood risks, as well as a set of recommended mitigation measures to be taken.<sup>25</sup> This will be updated and adopted for both sites.

The CMP and final project design for Site 2 will incorporate such additional measures to address increased flood risk and appropriate drainage.

The Client will also perform regular tests of the fire safety systems ("FSS") for all operations to ensure constant operational readiness.

#### 4.4.a.ii Hazardous Materials Management and Safety

This is managed through the Company's Integrated Waste Management Plan and hazardous substances management plan. Procedures will be developed further through arrangements with the waste management plant operating on the Port. Where contractors lease warehouse facilities, they are responsible for managing any hazardous waste generated at those locations.

#### 4.4.a.iii Ecosystem Services

The Project will not produce any material impact on ecosystem services.

#### 4.4.a.iv Community Exposure to Disease

This is addressed via the Community, Health and Safety Plan for the port.

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<sup>25</sup> September 24th, 2021

#### 4.4.a.v Emergency Preparedness and Response

The Client's emergency preparedness and response is captured via its updated EMRP which will be adopted for the Project.

#### 4.4.b Security Personnel

A security risk assessment was conducted for the port to identify and address major hazards. Procedures for security personnel are in place. As part of the Code of Ethics and Conduct, employees must comply with all Company-prescribed workplace security measures and participate in mandatory security briefings. Port security is also audited by the US coastguard and local maritime authority as required.

### **4.5 Land Acquisition and Involuntary Resettlement**

The land for Site 2 is currently vacant and procured by KPF for commercial and industrial purposes via a long-term lease from the government.<sup>26</sup>

The Project will therefore not require the acquisition of land and will not cause any physical or economic displacement of the population.

### **4.6 Biodiversity Conservation and Natural Habitats**

The Project will generate no material impacts to biodiversity.

### **4.7 Indigenous Peoples**

Project works will not impact any indigenous community.

### **4.8 Cultural Heritage**

The CMP will also include chance find procedures.

## **5. Local Access of Project Documentation**

For information and documentation relating to the project the following can be contacted:

- Vinood Ramkhelawan – [v.ramkhelawan@kuldipsingh.net](mailto:v.ramkhelawan@kuldipsingh.net)

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<sup>26</sup> Expiry date: 3 March 2062