

Environmental and Social Review Summary (ESRS) One Communications (Guyana) Inc – Guyana

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

The present operation aims at supporting One Communications (Guyana) Inc, formerly known as GTT Inc or Guyana Telephone and Telegraph Company¹ (“One Communications Inc.” or “the Client”), which is a mobile network operator and one of the main telecommunications providers in the country that offers various services, such as landline and mobile phone, internet, and data solutions. It will fund: i) capital investments, specially to expand its 4G/5G and Fibre to Home (“FTTH”) networks to areas that currently lack adequate infrastructure or service quality to meet the growing data demand; and ii) general working capital requirements (all together the “Project”). One Communications Inc. is majority owned by its parent company ATN International, Inc. (“ATN Inc.” or the “Company”), based in the United States (“US”) which engages in the provision of digital infrastructure and communications services for rural and remote communities both internationally and in the US.²

The Environmental and Social Due Diligence (“ESDD”) included virtual meetings with the Client, and the review of its environmental management system, including, among other, the necessary permits and licenses needed for the Project, as wells as its corporate policies and procedures on environmental health and safety, waste management, emergency response, gender, and human resources.

2. Environmental and Social Categorization and Rationale

The Project has been classified as a Category B operation according to IDB Invest’s Environmental and Social Sustainability Policy since it may generate the following impacts: i) occupational health and safety risks; ii) air and noise emissions; iii) waste generation; and iv) community disturbance, among others. These impacts are deemed to be of medium-low intensity, which can be managed through standard risk and impact mitigation measures and management plans.

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.

¹ One Communications Inc. is owned by [ATN Inc.\(80%\)](#), and [Hong Kong Golden Telecom Company Limited](#), a Chinese telecommunications provider (20%)
² Other subsidiaries located in Bermuda, Cayman, US Virgin Islands and rural western US and Alaska

3. Environmental and Social Context

3.1 General characteristics of the Project's site

The Project is expected to cover a wide geographical cross section of Guyana linked to FTTH and/or 4G/5G expansion in areas with existing One Communications Inc. infrastructure, and a limited number of new areas with no such existing infrastructure.³ The Client operates from offices and other operational facilities located in the capital Georgetown and several regional offices.⁴ Outside of Georgetown, most of these areas are a mix of peri-urban and rural (hinterland).

3.2 Contextual risks

Guyana is considered a booming oil economy, rapidly transitioning from low income to upper-middle income. However, its economic growth has not translated into changes in overall human development. The country is generally classified as one with very high levels of social and economic inequality.⁵ Sharp differences in living standards between the coastal plain and the hinterlands are visible as anecdotal evidence underscores marked differences in income distribution among the various ethnic groups. Although poverty has remained relatively stable,⁶ decreasing from 14.98% in 2021 to 12.3% in 2023, homicide rates have doubled,⁷ and the national reported robbery and burglary rates⁸ both significantly exceed global averages.⁹

Infrastructure challenges related to transportation, energy, telecommunications, water and sanitation, and flood protection continue to represent key constraints to private sector development. High energy costs and reliability have led many households and firms to source or supplement power from generators, thereby representing significant private costs to the economy. In addition, driven by a rural urban divide, access to electricity is below regional averages.¹⁰

The telecommunications sector is considered a challenge, with coverage of information and communication technologies and their utilization (by government, businesses, and individuals) amongst the lowest in the region. Only 28 % of the households are connected, reflecting a clear gap in terms of digital infrastructure. Though broadband subscriptions increased between 2010 and 2021, the country remains below regional averages.¹¹ As a result, this has hindered productivity, competitiveness, and innovation.

Overall, oil production has introduced a new set of challenges since the country has never been an oil producer. The size of the expected oil-related windfall, in combination with existing development

³ For example, new Government approved housing schemes

⁴ Betervewagting (Demerara), Retrieve (Linden), New Amsterdam (Berbice), and Bartica.

⁵ [IDB Group Country Strategy with The Co-Operative Republic of Guyana \(2023-2026\); \(2017–2021\)](#)

⁶ Countries reporting higher levels of poverty than Guyana include Haiti, Guatemala, and Honduras. The poverty level has remained relatively stable in Guyana, averaging 42.3 % in the first three quarters of 2021.

⁷ From 9.9/100,000 in 2000 to 20.4 in 2013

⁸ 191/100,000 and 278/100,000 respectively

⁹ United Nations Office on Drugs and Crime

¹⁰ The average tariff for household electricity in Guyana is US\$0.23/kilowatt hour (kWh), higher than the average for several Latin American and Caribbean (LAC) countries of US\$0.16/kWh, though lower than The Bahamas, Barbados, and Jamaica (GlobalPetrolPrices.com, 2022). 63 % of Guyanese firms reported high energy costs as a major or very severe obstacle to doing business.

¹¹ At 11.8 subscriptions per 100 population compared to 16.7 in LAC and 21.3 specifically in the Caribbean

challenges, is expected to increase pressure on the current legal and regulatory framework, public finances, and potentially economic competitiveness. It has been assessed that the new dynamics are likely to contribute to increased migration inflows. In parallel, this will most likely result in an increased demand for electricity and housing presenting numerous challenges to the country's capacity to absorb and integrate them.¹² The recent border dispute between Guyana and Venezuela has also resuscitated long-standing geopolitical tensions regarding claims to the Essequibo region and offshore areas following the major oil and gas discoveries.¹³

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

One Communications Inc. possesses some internal procedures to comply with local requirements, including acquiring the applicable licenses and permits for its operation (that usually establish compliance conditions, including monitoring and reporting), some of which are issued by the Environmental and Protection Agency ("EPA"), Guyana Energy Agency ("GEA") and the Guyana Fire Service. However, it does not have a formal Environmental and Social Management System ("ESMS") to guide business activities in the assessment and management of environmental and social ("E&S") risks and impacts. Therefore, the Client will develop and adopt a formal ESMS for the Project and will also: i) prepare a permit register; ii) present valid copies or approvals of the required licenses and permits; and iii) ensure that all the requirements in such licenses and permits are monitored and complied with.

4.1.b Policy

ATN Inc. has a series of commitments reflected through its environmental, social, and governance ("ESG") approach.¹⁴ The Client will prepare and adopt an E&S policy that is compatible with ATN's commitment and outlines its focus on the sustainability of the environment of the communities within which it operates as part of its ESMS for the Project.

4.1.c Identification of Risks and Impacts

Although presently One Communications Inc. has some risk management and mitigation elements included in certain specific procedures and policies, there is no systematic procedure to identify E&S risks or impacts. Therefore, as part of its ESMS, it will: i) develop such procedure, consistent with good international industry practice and local requirements; and ii) prepare an E&S risk and impact identification matrix.

¹² From 2018 to 2021, estimates indicate that Guyana received more than 15,000 immigrants from other countries of LAC. The increase represents nearly 2% of the population of Guyana. (IDB Calculations based on UNDESA and R4V)

¹³ [Venezuela creates new state in territory under dispute with Guyana](#)

¹⁴ <https://www.atni.com/sustainability>

4.1.c.i Direct and indirect impacts and risks

Alongside daily operations, Project activities linked to works needed to upgrade or expand some of the Client's infrastructure may potentially generate the following impacts and risks: i) occupational health and safety risks; ii) air and noise emissions; iii) waste generation; and iv) community disturbance. Indirect impacts may include network disruptions, traffic disturbance and damage to street and road infrastructure linked to FTTH expansion and upgrade.

To ensure proper risk and impact management for the Project, the Client, during the routine supervision to be performed by IDB Invest, will provide information of all proposed works that could generate material E&S risks or impacts.

4.1.c.ii Analysis of alternatives

The proposed interventions will be carried out on the Client's existing installations and infrastructure. Therefore, no alternative assessment was carried out.

4.1.c.iii Cumulative impact analysis

Since primary interventions identified thus far will be undertaken across the Client's existing installations and networks distribution, no cumulative impact assessment was carried out. The ESMS will outline a process for such analysis associated with potential future works.

4.1.c.iv Gender risks

The socio-economic profile of Guyana highlights the vulnerabilities of both men and women. However, women are more at risk because of their lower social and economic status, lower rates of participation in the labor force, higher rates of unemployment, and lower wages, as well as their increased responsibilities for domestic work and care of children, the sick, the elderly, and the disabled. The rate of poverty is higher among women and, since approximately 28% of households are headed by females, these families are at even greater risk. Reports indicate that Amerindian women in rural areas are even more vulnerable than Afro or Indo-Guyanese women.¹⁵ Overall, the country does not have frequent and comprehensive labor or household surveys.

While female labor force participation has increased, it is still well below regional averages and women still have much lower participation rates than men. Additionally, women's employment is more concentrated in sectors with lower earning potential with 60.8% of women employed in the service sector, compared to only 41.8 % of men – this includes lower participation in agricultural and extractive industries, which are the largest sources of employment and profits in Guyana. Women also have low participation as top managers, representing 17.7 % in the country, which is slightly lower than the regional average of 21.1%.¹⁶

¹⁵ <https://wrd.unwomen.org/sites/default/files/2023-02/P171256061c7720380a3930fca480d1e516.pdf>

¹⁶ Guyana Country Development Challenges (CDC), December 2016

As it relates to education, just as in other Caribbean countries, girls and women have higher rates of attendance at educational institutions than boys and men.¹⁷ In addition, girls tend to achieve better examination results linked as well to the relatively high percentage of female-headed households. However, the result is mixed as it relates to health, education, and other social indicators in terms of their likely impacts on employment for women and men. While women have overtaken men in educational attainment, economic opportunities remain skewed against women (men have a labor force participation rate of 68% compared to 44.1% for women), with employment loss disproportionately affecting women.¹⁸

Violence against women and girls is widespread driven by an intersection of cultural, economic, social, and political factors. Although the country's comprehensive legislative environment protects their rights, women and girls continue to suffer high rates of sexual and other forms of victimization. Persistent and endemic sociocultural norms and enduring inequalities have given rise to an aberrantly high prevalence of intimate partner violence ("IPV"). Guyanese women experience IPV at significantly higher rates than the global average of 1 in 3 women.¹⁹ The country is also noted as a source and destination country for human trafficking, which affects men, women, and children.

4.1.c.v Gender Programs

Approximately 34% of the Client's workforce are women, with 16% holding senior management positions.²⁰ There are separate sanitation facilities for female workers equipped with appropriate amenities for feminine hygiene. Some specific workplace conveniences available to all employees include: i) a daycare subsidy for their children up to the age of nine (9); ii) permission for school age children to accompany them to work when necessary; and iii) hybrid work arrangements whereby, depending on roles and responsibilities, one may work remotely (fully or partially).

The ATN Code of Ethics²¹ notes that it *will not tolerate discrimination in employment on the basis of race, color, age, gender, sexual orientation, religion, disability, national origin, genetic information, veteran status or any status protected by applicable law*. Accordingly, all forms of harassment in the workplace are prohibited.²² The Code applies to all employees, representatives of ATN, customers, and vendors. One Communications Inc. employees of as a condition of their employment are bound to abide by this code.

Similarly, the Company's Employee Handbook provides explicit definitions on what constitutes sexual harassment (including domestic, sexual, or other crimes of violence) and reporting procedures which include prohibition of retaliation. It notes that all employees are required to undergo harassment prevention training as required by applicable law.²³ Special leave is also available for victims.

¹⁷ In 2019, 70.9% of women had at least some secondary education while only 56.4 % of men had the same level of educational attainment.

¹⁸ https://statisticsguyana.gov.gy/wp-content/uploads/2019/10/GLFS_2017_Quarter3_Final-PDF-1.8MB.pdf

¹⁹ <https://statisticsguyana.gov.gy/wp-content/uploads/2020/01/20191117-Guyana-Womens-Health-Report-11-for-digital-single-pages.pdf>

²⁰ 266 of 717 for total workforce; 4 of 24 for senior management positions

²¹ <https://ir.atni.com/static-files/Of184e69-8304-48cf-b757-7c98d2471b3d>

²² The Code of Ethics notes: Harassment includes behavior, whether in person or by other means, such as e-mail or mobile messaging, that is offensive and interferes with an employee's work performance or creates an intimidating, hostile, or offensive work environment. Harassment may take many forms, including unwanted physical contact, sexual advances, threatening behavior and demeaning comments, jokes or gestures.

²³ <https://www.dfeh.ca.gov/shpt/>

ATN Inc. also has a Human Rights and Labor Policy, which believes that attaining equality between women and men, and eliminating discrimination against women are fundamental rights. These policies are intended to govern the Client's operations.

4.1.c.vi Climate change exposure

Guyana is exposed to a wide range of natural hazards and climate-related events, particularly those related to sea level rise ("SLR"), and extreme rainfall and temperatures. Historically, it has been exposed to flooding because of low-lying land, and challenges maintaining the system of sea defenses and drainage infrastructure comprising a network of dikes, conservancy dams, and sluices.²⁴ There are two rainy seasons characterized by frequent flooding: May to mid-August, and December to January. In many cases, the drainage capacity is unable to accommodate daily rainfall events that exceed a 25-year return period, and coastal areas such as Georgetown remain at higher risk of flooding due to coastal storms and extreme rainfall.

SLR therefore presents a significant threat to the country given its extensive low-lying coastal zone and the concentration of socio-economic activities within these areas. According to SLR models, Guyana is forecast to be one of the most affected countries in the Latin America and the Caribbean ("LAC") region, with some scenarios anticipating as much as 60 miles of coastline lost by 2050.²⁵ Vulnerability scenarios for the coastal zone indicate that SLR overtime will lead to inundation of coastal areas, saline intrusion into surface and ground water sources, and overtopping of existing sea defenses. Risk factors related to flooding may therefore impact infrastructural networks even in non-coastal areas. Indirect impacts related to heat waves and increased temperatures include occupational health and safety issues during extreme temperatures and potential overheating of network hardware and infrastructure (e.g., street cabinets).

Given this exposure profile to natural hazards, the Project is classified as moderately exposed to physical climate-related hazards. As such, the Client will ensure infrastructural upgrades and FTTH expansion include adequate mitigation and adaptation measures to offset potential impacts primarily due to risk from flood, SLR and extreme temperatures.

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

One Communications Inc. has plans related to Emergency Preparedness and Response ("EPR"), and Business Continuity ("BC") which caters for management protocols to be deployed during any emergency incidents, accidents, and force majeure events. However, there are currently no structured E&S management programs to guide activities.

²⁴ [IDB Group Country Strategy with The Co-Operative Republic of Guyana \(2023-2026\)](#)

²⁵ <https://publications.iadb.org/publications/english/document/Independent-Country-Program-Review-Guyana-2017-2021.pdf>

Hence, as part of its ESMS, the Client will develop and implement management plans and programs to avoid, mitigate or compensate any negative E&S impacts associated with the Project.

4.1.e Organizational Capacity and Competency

The Client manages E&S matters via a team comprised of i) a Deputy Chief Executive Officer; ii) a Director (Employee Experience); iii) a Senior Manager (Facilities Operations); and iv) a Lead Officer (Occupational Health Safety and Environment (“OHSE”).

As part of the ESMS, the Client will: i) present an organization chart for the Project identifying a specific E&S focal point with roles and responsibilities; ii) provide a detailed E&S training matrix; and iii) present a proposal to familiarize and train all staff in the finalized ESMS.

4.1.f Emergency Preparedness and Response

Emergency preparedness and response is captured under the Client’s EPR and BC Plans. However, the Client will: i) submit the latest versions of the EPR and BC Plans; ii) based on these plans, include EPR procedures²⁶ as part of its ESMS; and ii) provide evidence of training for all staff on these plans.

4.1.g Monitoring and Review

Presently, the Client does not perform consistent environmental monitoring or audits and relies on annual inspections from the local licensing authorities. Therefore, as part of its ESMS, it will develop and adopt: i) protocols for monitoring and auditing of E&S risks; and ii) guidelines to evaluate its impact management performance. It will also present annual inspection reports and implement recommendations according to EPA permit requirements.

4.1.h Stakeholder Engagement

One Communications Inc. engages and communicates with its customers through several channels such as traditional media (e.g., TV, radio, press), along with social media (e.g., Facebook, Instagram), text (e.g., SMS and WhatsApp), a website, and via a MyGTT web-portal and app that facilitates customers access to service accounts.²⁷ The Client also communicates with its large Enterprise and Government clients by assigning designated account management representatives. . Even though stakeholder engagement is referenced generally as part of ATN Inc.’s ESG approach, there are no specific procedures to guide such process.

The Client will therefore: i) develop a structured Stakeholder Engagement Plan (“SEP”) as part of its ESMS; and ii) designate a community relations officer or its equivalent for the Project.

²⁶ Noting additional emergency categories and situations, including: i) both natural and man-made disasters; ii) clearly defined response procedures for each category; iii) a list of required equipment and maintenance protocols; iv) a list of designated personnel and focal points; v) the description of the location of evacuation routes and meeting points; vi) a detail of training schedules and drill procedures; vii) a list of emergency contacts communication flowchart; and viii) procedures for periodic review and update to the EPR)

²⁷ <https://www.mygtt.co.gy/login>

4.1.h.i Disclosure of Information

ATN Inc. has a group website which shares press releases and other general information for investors, along with links to its subsidiary operations which includes the Client.²⁸

4.1.h.ii Informed Consultation and Participation

Although the relevant local authorities and government agencies must provide approval prior to the undertaking of any works, public consultation and disclosure are not required by the government for the activities proposed by the Project. Therefore, as part of the ESMS development, the Client will outline a process for ongoing consultation with stakeholders.

4.1.h.iii Indigenous Peoples

The Project will not generate any impacts to indigenous communities.

4.1.h.iv Private Sector Responsibilities Under Government-Led Stakeholder Engagement

The Client will be guided by permitting and licensing requirements for any Project components requiring public stakeholder consultations.

4.1.i External Communication and Grievance Mechanisms

ATN Inc. via its website and Code of Ethics outlines several channels to report any comments or concerns directly or anonymously regarding the Company's business practices. These channels, available to all employees, customers, shareholders, vendors, and affiliates, include: i) an ethics hotline (call or text); ii) an ethics email and website; iii) contact for the head of Human Resources, General Counsel, and Audit Committee; and iv) a Whistleblower Reporting Form.

The Client, however, does not have specific documented procedures but complies with the ATN Inc's Code of Ethics and Whistleblowing procedures. Grievances from the community are generally made through the EPA and communicated to One Communications Inc. for further follow-up and remediation. Though its customer portal provides an option for general service support (e.g., to report issues, update information, modify services etc.), several of these links are not active.²⁹ Therefore, it will prepare and adopt a grievance mechanism (including but not limited to using ATN Inc.'s Code of Ethics and Whistleblowing procedures) for the Project.

4.1.i.i External communication

External communications are centered around both ATN Inc.'s and One Communications Inc. websites. For the latter, this also includes links to several social media platforms³⁰ with general information for customers surrounding advisories, promotions, and new products and services.

²⁸ <https://www.atni.com/our-companies>

²⁹ <https://www.gtt.co.gy/webform/report-issue>

³⁰ Facebook, Instagram, WhatsApp, X, LinkedIn and YouTube

4.1.i.ii Community grievance mechanism

The ESMS will outline a grievance mechanism (including but not limited to using ATN Inc.'s Code of Ethics and Whistleblowing procedures) for communities which may be affected by daily operations or the Project. The Client will provide evidence of dissemination and training on the grievance mechanism.

4.1.i.iii Provisions for addressing vulnerable groups' grievances

The grievance mechanism will capture and address grievances from all stakeholder groups (including vulnerable groups) relevant to the Client's existing operations and the Project.

4.1.j Ongoing Reporting to Affected Communities

The SEP will outline steps to ensure ongoing reporting to any communities and stakeholders affected by the Client's daily operations or the Project.

4.2 Labor and Working Conditions

4.2.a Working Conditions and Management of Worker Relationships

The Client has several offices located across Guyana, which includes service stores. The workforce includes 603 employees.³¹

4.2.a.i Human Resources Policies and Procedures

Details regarding labor and working conditions are covered sufficiently via several human resources ("HR") by ATN Inc. policies and procedures, including its: i) Code of Ethics; ii) Employee Handbook; iii) Whistle Blower Policy; and iv) Anti-Corruption Compliance Policy. While not in the Client's handbook, these documents are available to its employees and compliance is a condition of employment. Since these instruments have not been adequately adopted and reflected in its Employee Handbook,³² the Client will update its handbook in line with ATN Inc.'s HR policies and procedures.

4.2.a.ii Working Conditions and Terms of Employment

As part of its ESG approach, ATN Inc. references an annual employee engagement survey which provides employees with the opportunity to share confidential feedback on elements which are working well and those which could be improved within the Company teams.

³¹ Breakdown % of women: 37% of employees; 19% of independent contractors.

³² The One Communications Inc. (GTT) Employee Handbook was last updated in 2008

Details regarding working conditions and employment are outlined in ATN Inc.'s Employee Handbook which will be similarly reflected in the Client's updated Employee Handbook. Terms of employment for the Client are also guided by local labor laws.

4.2.a.iii Workers' Organizations

The Client acknowledges freedom of association. It has a Collective Labour Agreement with the Guyana Postal and Telecommunication Workers Union with respect to wages and other conditions of employment. The Client also has an assigned employee who oversees union related matters alongside established committees comprising of employees and senior union representatives. There is frequent union engagement on significant matters that may affect members.

4.2.a.iv Non-discrimination and Equal Opportunity

The Company's Employee Handbook states that it *does not discriminate on the basis of actual or perceived race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and pregnancy-related conditions), gender identity or expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information, or any other characteristic protected by applicable federal, state or local laws and ordinances*. It notes that all employees have the right to be treated with dignity and respect, and to work in an environment free from any form of harassment or discrimination. ATN Inc.'s management teams' endeavor to implement this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities, access to facilities and programs, and general treatment during employment. Its Human Rights and Labor Policy also highlights similarly that it *does not tolerate discrimination on the basis of race, color, religion, sex, age, national origin, disability or any other factor prohibited by law*.

These elements will be reflected in the Clients's updated Employee Handbook.

4.2.a.v Retrenchment

At present there are no plans for collective dismissals.

4.2.a.vi Grievance Mechanism

The management of internal grievances and steps for reporting irregularities are outlined in the Company's Code of Ethics, Whistleblowing Policy, and Anti-Corruption Compliance Policy. They apply to employees of ATN Inc., its subsidiaries (including the Client) or other interested persons and third parties (including but not limited to independent contractors of the Company). The procedures provide channels and options for confidential and anonymous reporting along with anti-retaliation. Conversely, the Client's grievance procedures require an update as those in place specifically apply only to union relations.³³

³³ Dated 1994

The Client will therefore prepare an internal grievance mechanism to adequately reflect the applicable HR policies of the Company within its ESMS and updated Employee Handbook. The mechanism will outline separate procedures to address internal and external grievances and ensure its effectiveness and timeliness. This will include a description on: i) the specific channels for grievance reception; ii) the teams responsible for grievance reception, assessment, and response; iii) the expected timing of response; iv) an anti-reprisal policy; and v) identity protection procedures (i.e., confidentiality, anonymity, sexual harassment, etc.).

4.2.b Protecting the Workforce

One Communications Inc. is guided by local law through the Occupational Health and Safety Act which sets out the rights and duties of all parties in the workplace. The ATN Inc. Employee Handbook outlines a policy for maintaining a Drug-Free and Alcohol-Free Workplace. It also specifies channels for employees who require special accommodations to perform their essential functions. The updated Client Employee handbook will capture these elements.

4.2.b.i Child Labor

According to its Human Rights and Labor Rights Policy, ATN Inc., does not condone any inhumane treatment, particularly sexual harassment, sexual abuse, verbal abuse, mental or physical coercion, corporal punishment, forced labor, child labor, human trafficking, or slavery. It explicitly prohibits child labor, including the hiring of individuals that are under eighteen (18) years of age for positions in which hazardous work is required.³⁴

Within the local framework, according to Guyanese legislation the minimum age for employment is fifteen (15) years. The Client is guided accordingly. Though measures are also put in place to ensure protection, careful treatment and safety of all employees who fall within the minimum age, there are no provisions against child labor in its policies. Hence, the Client will ensure the updated Employee Handbook and contractor policies and procedures include provisions against the use of child labor.

4.2.b.ii Forced Labor

As noted in ATN Inc.'s Human Rights and Labor Rights Policy, it does not condone any inhumane treatment, particularly sexual harassment, sexual abuse, verbal abuse, mental or physical coercion, corporal punishment, forced labor, child labor, human trafficking, or slavery. Specifically, it prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking.

Guyana has also ratified the International Labor Organization's ("ILO") Convention No. 29 on Forced Labor and Convention No. 105 on Abolition of Forced Labor. The Client complies with Guyanese Legislation, although there are no provisions against forced labor in its current policies. Therefore,

³⁴ ATN Inc. complies with laws and regulations governing the employment of minors whereby no person under the age of eighteen (18) may be employed without the prior written approval of HR. Minor employees must also provide a copy of a work permit or other documentation as required by law.

the Client will ensure the updated Employees Handbook and contractor policies and procedures include provisions against the use of forced labor.

4.2.c Occupational Health and Safety

One Communications Inc. has a Health and Safety (“H&S”) Policy which outlines a commitment to *providing a safe & healthy working environment for all its employees, customers, visitors, and other stakeholders and to eliminating conditions and incidents that could result in ill health and personal injury*. Personal Protective Equipment (“PPE”) is provided for employees including, where necessary, accommodation, meals and subsistence paid to employees working outside of normal working conditions.³⁵ An H&S assessment was carried out recently³⁶ and the Client notes that there is a learning management system which contains training materials for employees, as well on the job training.

The Client will prepare the ESMS to include: i) hazards identification; ii) risk assessment and classification; iii) special permissions and procedures for high-risk work; iv) regular monitoring of H&S indicators; v) employees safety training plan; vi) step-by-step procedures for reporting accidents including root cause analysis; and vii) detailed accident investigation procedures (including emergency contact information).

Aligned with its ESMS, the Client will update its existing H&S Policy to reflect measures (in particular for field offices, employees and contractors) regarding: i) working at heights and fall protection; ii) confined spaces; iii) motor vehicle safety; iv) optical fibre safety; v) electrical safety; vi) adverse weather conditions; and vii) first aid response. It will also: i) provide adequate training on these measures; ii) implement relevant recommendations from the H&S assessment; and iii) submit annual H&S statistics with root cause analysis for any reported accidents.³⁷

4.2.d Provisions for people with disabilities

Provisions for people with disabilities are covered through the ATN Employee Handbook which highlights endeavors to make reasonable accommodation related to an individual's physical or mental disability.³⁸ Consistent with its Equal Employment Opportunity commitment with respect to individuals with disabilities, the Company *will provide reasonable accommodations to applicants and employees who are qualified individuals with disabilities if the reasonable accommodation would allow the individual to perform the essential functions of the job, unless doing so would create an undue hardship*. It expressly prohibits any form of retaliation against any individual for requesting an accommodation in good faith. Employees who believe they need accommodation because of disability are instructed to make such requests in writing to supervisors and HR representatives. The Client will adopt this policy as part of its updated Employee Handbook.

³⁵ Over 8 hours per day

³⁶ October to December 2023

³⁷ Statistics for the last 12 months indicate 1 contractor fatality; 7 lost time accidents; 37 lost workdays; and 5 vehicle collisions.

³⁸ Includes specific section on The Americans with Disabilities Act (ADA) which protects disabled individuals from discrimination in employment and other major aspects of everyday life. The ADA defines a "qualified individual with a disability" as an individual with a disability who can, with or without reasonable accommodation, perform the essential functions of the job that such individual holds or desires.

4.2.e Workers Engaged by Third Parties

ATN Inc. has a dedicated section on its website covering its Vendor and Supplier Ethics and Standards³⁹ and per its Purchase Order Terms and Conditions,⁴⁰ suppliers are required to comply with applicable federal, state and local laws including those governing the use, transportation, and disposal of hazardous materials. Additionally, it requires suppliers to *not discriminate against any employee or applicant for employment because of race, color, religion, disability, sex, national origin, age, physical or mental disability, veteran status, or any other unlawful criterion, and it shall comply with all applicable laws against discrimination and all applicable rules, regulations and orders.*

The Company is in the process of implementing a new Enterprise Spend Management (“ESM”) to streamline and effectively manage the supplier relationship.⁴¹ Pending formalization of such a system, the Client will include contractual obligations to ensure contractors are bound by the relevant HR, H&S, environmental, and antidiscrimination procedures and policies. It will also ensure that these provisions are communicated to the contractors during the procurement of new services.

4.2.f Supply Chain

Via its ESG Approach covering supplier engagement, ATN Inc. works with strategic supply chain partners requiring them to: i) uphold its Sustainability Compliance Standards and comply with all environmental regulations and other requirements; and ii) continually improve their environmental processes and prevention of pollution.

The Client will update its procurement procedure and policies to incorporate these elements, including those to ensure that no child or forced labor has been used along its supply chain. These measures will be communicated to third parties such as contractors and sub-contractors.

4.3 Resource Efficiency and Pollution Prevention

4.3.a Resource Efficiency

Although it has plans to relocate to eco-friendly buildings, One Communications Inc. utilizes both electrical grid and self-generation electricity via diesel fuel as back up to maintain continuous telecommunications operations.

Energy consumption is tracked by the Client and reported to ATN Inc. for its ESG and Securities and Exchange Commission (“SEC”)⁴² reporting purposes, and as a means to improve resource efficiency.

³⁹ <https://www.atni.com/about-atni/supplier-information>

⁴⁰ https://www.atni.com/sites/default/files/2022-03/atns_purchase_order_terms_and_conditions.pdf

⁴¹ [Coupa software will enable a formal onboarding of suppliers](https://www.atni.com/newsroom/press-releases/2024-31)

⁴² <https://www.sec.gov/newsroom/press-releases/2024-31>

4.3.a.i Greenhouse Gases

Due to the nature of the Project, it is expected that its GHG emissions will not be material.
Water Consumption

Water for the Client's operations is provided via the municipal utility through Guyana Water Inc. ("GWI") and rainfall harvesting. Sites are equipped with overhead tanks and pressurized water system. Filtered (potable) water for employees is provided by a private company.

4.3.b Pollution Prevention

The Client does not have a specific set of procedures to guide or monitor pollution prevention for its operations.

4.3.b.i Wastes

Waste streams for operations are linked to sanitary liquid waste (e.g., office bathrooms), and solid waste (office, electronic, obsolete equipment, telecommunications infrastructure and devices etc.).

As there is no structured waste management plan, the Client, as part of its ESMS will: i) conduct a waste audit for all categories of waste; and ii) prepare an Operational Waste Management Plan ("OWMP") to address all waste streams (solid, liquid, and hazardous).

4.3.b.ii Hazardous Materials Management

Management of hazardous materials will be managed through the OWMP and ESMS.

4.3.b.iii Pesticide Use and Management

Pesticide and chemicals are used by the Client's contractors for pest management (including but not limited to, bees, snakes, wasps). The H&S Policy and OWMP will include measures and guidelines regarding appropriate pesticide use and management, and specify that the Client will not purchase, store, use, or trade in products that fall in WHO Recommended Classification of Pesticides.⁴³

4.4 Community Health, Safety and Security

4.4.a Community Health and Safety

The Project's interventions are not expected to generate significant E&S impacts. However, some of these works may produce small-scale localized impacts such as: i) waste generation; ii) air and noise emissions; iii) occupational health and safety risks; and vi) community disturbance. These impacts, some of which are already linked to daily operations, are currently managed via a mix of policies

⁴³ According to Hazard Class Ia (extremely hazardous); or Ib (highly hazardous).

and procedures (e.g., EPR, H&S, Code of Ethics) and provisions contained in local environmental permits and licenses. In keeping with the local permit requirements for its operation, the Client is also required to manage and monitor its facilities regarding spills, leaks, water quality, noise, waste management and fire response and protection.

4.4.a.i Infrastructure and Equipment Design and Safety

The Client references its H&S Policy, and EPR and BC Plans as the primary tools for infrastructure safety and emergency management. Though the H&S Policy captures some elements of fire response for offices, it does not cover field facilities. Via its local permits and licenses, there are several requirements to ensure safe operation of its facilities such as: i) appropriately classed fire extinguishers based on location; ii) installation of leak detectors; iii) adequate fuel storage containment; iv) spill kit maintenance; v) septic tank guidelines; and vi) noise suppression measures. Fire drills are carried out at least once per quarter, with established evacuation and assembly points, trained fire marshals, and fire suppression systems and fire extinguishers for each manned location.

For its permitted facilities, the Client will: i) submit inspection reports; ii) present annual monitoring reports;⁴⁴ iii) conduct safety audit (including its offices and stores); and vi) submit relevant training and drill reports.

4.4.a.ii Hazardous Materials Management and Safety

Hazardous Materials Management and Safety will be managed through the OWMP and ESMS.

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

The updated H&S Policy will outline steps to manage general exposure risk to relevant communicable disease or other illness (including Sexually Transmitted Infections (“STI’s”) and vector-borne diseases), along with regular training for employees and contractors.

4.4.a.v Emergency Preparedness and Response

The Client’s emergency preparedness and response will be captured in its ESMS, H&S Policy, and EPR and BC plans.

4.4.b Security Personnel

The Client employs private security for its properties. Armed personnel are used where cash collection is involved. Therefore, the Client will submit a Security Screening Assessment and

⁴⁴ For 2023-2024 (31 March), and annually thereafter per EPA guidelines.

evidence of training regarding relevant policies (e.g., code of conduct, use of drugs and alcohol in the workplace).

4.5 Land Acquisition and Involuntary Resettlement

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

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 Project will not affect any cultural heritage. However, chance finds procedures will be outlined as part of the ESMS for works associated with FTTH expansion.

5. Local Access of Project Documentation

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

- Damian Blackburn – dblackburn@gtt.co.gy or
- Kadeem Davis – kdavis@gtt.co.gy