

Environmental and Social Review Summary (ESRS) Sheriff Group (Mall) – Guyana (One (Guyana) High Rise)

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

The Sheriff Group and its subsidiaries will be undertaking the construction of a commercial complex in the form of a sustainable shopping mall in Guyana (the “Project”). The principal subsidiaries for the Project include: i) Sheriff Security Services¹ (“Sheriff Security”) which provides security services to corporate clients in Guyana; and ii) Sheriff Construction Inc.² (“Sheriff Construction”) which focuses mainly on civil construction undertaking a wide range of construction projects, from commercial buildings to infrastructure development – collectively the “Company” or the “Client”.³

The Project will consist of approximately thirty (30) rental retail spaces designed to serve primarily Micro, Small, and Medium Enterprises (“MSME”) tenants. With the support of IDB Invest, the complex will have EDGE green building certification.⁴

The Environmental and Social Due Diligence (“ESDD”) included: i) a site visit; ii) virtual meetings with the Client; and iii) the review of the Company’s environmental management systems, policies and procedures on environmental health and safety, waste management, emergency response, gender, stakeholder engagement, and human resources.

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 site-specific impacts: i) solid and liquid waste generation; ii) noise and vibration disturbance; iii) air and dust emissions; iv) occupational health and safety (“OHS”) impacts; and v) secondary vegetation clearance. These impacts are deemed to be of medium intensity, are generally limited to the Project site (located in an area designated for development), and can be managed via measures that are readily available and feasible to implement in the context of the operation.

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 <https://sssgy.net/>

² <https://www.stabroeknews.com/2024/01/21/news/guyana/sheriff-guyana-launches-construction-company/>

³ Includes Sheriff International Hospital Inc. owns the land on which the mall will be built via lease agreement with the Government of Guyana

⁴ [Intended to have Level 1 certification with 20% or more savings in energy, water and embodied energy in materials](#)

3. Environmental and Social Context

3.1 General characteristics of the Project's site

The site is located in the East Bank Demerara area of Plantation Houston, on the eastern side of the new Heroes Highway heading south. It is approximately 3 km (about 2 miles) east of the Demerara River and within an area which was formerly a part of more extensive farmland. The land (approximately 5 acres or 2 hectares), was previously earmarked for the construction of a hospital as part of the Company's infrastructural portfolio. It therefore contains a base foundation and steel framework which will be incorporated as part of the Project design, thereby reducing intensive site preparation. The remaining undeveloped section is covered with secondary vegetation typical of Georgetown and its neighboring areas, with medium to low-lying shrubbery comprised of commonly occurring plant species. A portion of this area will be used for designated parking. Per local requirements, a sub-road to the south of the site has also been created to manage site access and regulate traffic. The site is also adjacent to a new hotel in the advanced stages of construction along its northern boundary,⁵ and is otherwise surrounded by similarly developed open parcels in various stages of commercial development along the busy thoroughfare.

The hydrology of the area is classified as part of the coastal lowland zone and is interspersed to varying degrees, with a network of drainage canals (some which are relics of agricultural drainage) which help to regulate surface runoff. Flooding and oversaturation are therefore common during periods of high rainfall.

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.⁶ 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,⁷ decreasing from 14.98% in 2021 to 12.3% in 2023, homicide rates have doubled,⁸ and the national reported robbery and burglary rates⁹ both significantly exceed global averages.¹⁰

The issue of crime and insecurity is particularly important for the private sector as firms in Guyana report crime as a major impediment to their performance. Additionally, more than half of Guyanese firms identify an 'inadequately educated workforce' as a major constraint to their performance.¹¹

⁵ [The Four Points by Sheraton Hotel](#)

⁶ [IDB Group Country Strategy with The Co-Operative Republic of Guyana \(2023-2026\); \(2017–2021\)](#)

⁷ 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.

⁸ From 9.9/100,000 in 2000 to 20.4 in 2013

⁹ 191/100,000 and 278/100,000 respectively

¹⁰ United Nations Office on Drugs and Crime

¹¹ Guyana Country Development Challenges (CDC), December 2016

Electricity tariffs are among the highest in the region with Guyanese companies reporting high energy costs as a major obstacle. Despite its hydro, photovoltaic, biomass, and wind power potential, 83% of the installed electricity generation capacity is still sourced from fossil fuels, and the publicly provided service is not reliable and only extends to 26% of the population.¹²

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.¹³

Infrastructure challenges related to transportation, energy, telecommunications, water and sanitation, and flood protection continue to represent key constraints to private sector development.

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 challenges, is expected to increase pressure on the current legal and regulatory framework, public finances, and potentially economic competitiveness, and will likely contribute to increased migration inflows. In parallel, this will most probably result in an increased demand for electricity and housing presenting numerous challenges to the country's capacity to absorb and integrate them.¹⁴ 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.¹⁵

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 Company does not yet have an Environmental and Social Management System ("ESMS") to guide business activities in the assessment and management of environmental and social ("E&S") risks and impacts. However, it is ISO 9001 and ISO 45001 certified¹⁶.

The Client will therefore develop a formal ESMS to incorporate the necessary E&S elements.

¹² IDB Group Country Strategy with The Cooperative Republic of Guyana 2017–2021, October 2017

¹³ 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.

¹⁴ 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)

¹⁵ [Venezuela creates new state in territory under dispute with Guyana](#)

¹⁶ ISO 9001 sets out the criteria for a quality management system; ISO 45001 specifies requirements for an Occupational Health and Safety (OHS) management system; and ISO 14000 sets out the criteria for an environmental management system.

4.1.b Policy

Though Sheriff Security has a Corporate Governance Policy which outlines its Sustainability and Corporate Social Responsibility (“CSR”) via a commitment to minimizing its environmental impact through sustainable business practices and engaging in initiatives that contribute to the well-being of the communities in which it operates, an overarching E&S management policy has not yet been formally adopted by the Company.

As such, the Client will develop and adopt an E&S Policy for the Company based on the CSR as part of its ESMS.

4.1.c Identification of Risks and Impacts

Presently, the Client has no systematic procedure to identify E&S risks or impacts for its overall operations. General E&S issues are channeled through the Quality, Health, Safety, and Environment (“QHSE”) Department of Sheriff Security and guided by the relevant ISO certifications, alongside a summary section of its Health Safety (“H&S”) Manual linked to a H&S Risk Assessment and Emergency Response Register. Therefore, as part of its ESMS, it will develop such systematic procedures and prepare an E&S risk and impact identification matrix.

4.1.c.i Direct and indirect impacts and risks

The Project will likely generate the following site-specific impacts: i) solid and liquid waste generation; ii) noise and vibration disturbance; iii) air and dust emissions; iv) OHS impacts; and v) secondary vegetation clearance. Given the characteristics of the site with existing or surrounding ongoing developmental activities, indirect impacts may be associated with access and traffic disturbance and increased surface run-off.

Per local requirements, the Client must: i) obtain applicable construction and operational permits for the Project; and ii) submit a Construction Environmental and Social Management Plan (“C-ESMP”). Prior to the commencement of civil works, it will also submit any relevant technical reports.

4.1.c.ii Analysis of alternatives

Construction for the Project will take place in areas with parcels of land being developed or designated for commercial development. The site was previously earmarked and prepared for the construction of a hospital approved by the Government of Guyana. Therefore, no alternative assessment was carried out.

4.1.c.iii Cumulative impact analysis

The rapid cumulative impacts assessment considers the incremental effect of past projects already included in the baseline of the environmental components considered in the environmental analysis performed for the Project. There are several projects in execution in the Project’s area of influence that could generate some minor incremental impacts to those generated by the proposed works.

These will occur if construction activities overlap during the course of the day, and may exacerbate impacts associated with construction waste, noise, traffic, and dust. However, such aggregated impacts will be managed through the implementation of the C-ESMP.

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.¹⁷ 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%.¹⁸

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.¹⁹ 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.²⁰

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.²¹ The country is also noted as a source and destination country for human trafficking, which affects men, women, and children.

¹⁷ <https://wrd.unwomen.org/sites/default/files/2023-02/P171256061c7720380a3930fca480d1e516.pdf>

¹⁸ Guyana Country Development Challenges (CDC), December 2016

¹⁹ 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.

²⁰ https://statisticsguyana.gov.gy/wp-content/uploads/2019/10/GLFS_2017_Quarter3_Final-PDF-1.8MB.pdf

²¹ <https://statisticsguyana.gov.gy/wp-content/uploads/2020/01/20191117-Guyana-Womens-Health-Report-11-for-digital-single-pages.pdf>

4.1.c.v Gender Programs

Approximately 68% of Sheriff Security’s workforce are female (which includes women security personnel), followed by Sheriff Construction (8%) and contractors (5%) respectively with 37.5% holding senior management positions. Separate restrooms are in place across offices and will be similarly implemented for the Project. The Company addresses sexual harassment, non-discrimination, and diversity through its Sexual Harassment Policy (“SHP”), whereby it outlines a commitment to maintaining a work environment free of sexual harassment, alongside its Code of Ethics which addresses non-discrimination. The SHP provides definitions on what constitutes sexual harassment and reporting procedures which include protection against retaliation. It applies to all employees, external contractors, vendors, clients and any other third-party interacting with Sheriff Security. Violation of the policy can result in termination of employment or contracts and legal consequences. These procedures are complemented by the Sheriff Security Disciplinary Policy which outlines types of misconduct such as inappropriate language and behavior (minor), and violence or threats of violence (gross), with disciplinary actions proportionate to the severity of the misconduct – this may range from warnings (verbal or written), suspension or termination. However, there is no explicit reference regarding zero tolerance towards sexual exploitation of minors and gender-based violence (“GBV”), or formal workforce trainings and awareness campaigns regarding these matters.

Regarding general OHS, though Company uniforms are not adjustable, they can be replaced for a larger size should there be any known pregnancies. Pregnant women are not placed in high-risk environments, and there are options to transition to equivalent grade positions for pregnant and breastfeeding women to avoid hazards. The Company allows maternity leave of thirteen weeks.

4.1.c.vi Climate change exposure²²

Georgetown lies on the Atlantic coast of Guyana at the mouth of the Demerara River. Due to its location, it is subject to a range of climate-related hazards, including coastal storms and extreme rainfall. There are two rainy seasons (May to mid-August, and December to January), with frequent flooding experienced during these periods. The country’s drainage network around the coastal plain forms a series of larger primary channels fed by secondary channels that pump and sluice drain flood waters to the sea. However, in many cases, the drainage capacity is unable to accommodate daily rainfall events that exceed a 25-year return period. Several drainage canals associated with this network occur along the surrounding Project area, with coastal and inland flooding identified as the highest priority hazard.

Risk factors related to flooding may therefore place the Project at risk. The logistics sector is also sensitive to SLR and extreme temperatures which may represent a material risk as it relates to supply chain security. Indirect impacts related to heat waves and increased temperatures include higher energy consumption for cooling and OHS issues during extreme temperatures.

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 Project designs include adequate

²² Guyana Country Development Challenges (CDC), December 2016; IDB Group Country Strategy with The Cooperative Republic of Guyana 2017–2021

mitigation and adaptation measures to offset potential impacts primarily due to risk from flood and excess heat. These measures will be enhanced by the mandated EDGE certification.

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

Sheriff Security has a Quality Control Manual guided by ISO 9001 which serves to implement its Quality Management System. It also has, within its Health and Safety (“H&S”) Manual, the outline of an OHS management system which is implemented, maintained, and continually improved per the requirements of ISO 45001. However, there are no other structured E&S management programs within the Company. Hence, as part of its ESMS, the Client will develop and implement holistic management plans and programs (including an impact matrix), to avoid, mitigate or compensate negative E&S impacts, and stimulate the positive impacts of the Project and other operations.

4.1.e Organizational Capacity and Competency

Management of E&S matters are routed through the QHSE Team of Sheriff Security. Specific to H&S, this team is further supported by a Coordinator and a Joint Workplace Safety and Health Committee (“JWSHC”) comprised of representatives from both management and employees, responsible for promoting a safe and healthy work environment through regular meetings to discuss safety issues, review incident reports, and suggest improvements. It is also noted that the operation phase of the Project team will include a Facilities Manager (“FM”). Beyond this, there is no specified and designated E&S personnel.

The Client will therefore i) either hire or designate an E&S officer for the Project outlining role and responsibilities; ii) prepare FM job description to include E&S experience; iii) provide a detailed E&S training matrix as part of the ESMS; and iv) familiarize and train all staff in the finalized ESMS.

4.1.f Emergency Preparedness and Response

The Client currently has no standalone emergency preparedness response (“EPR”) plan to guide its operations, and most of its processes relating to EPR and training are ad hoc. Though some elements of emergency response are reflected in the H&S Manual and Emergency/Escorts Procedure for Sheriff Security, these are specific to security patrol.

Therefore, as part of its ESMS, the Client will develop and adopt a comprehensive EPR Plan for the Project. Such plan will include at minimum: i) applicable emergency categories and situations including both natural and man-made disasters; ii) clearly defined response procedures for each category; iii) required equipment and maintenance protocols; iv) designated personnel and focal points; v) the description of the location of evacuation routes and meeting points; vi) training schedules and drill procedures; and vii) procedures for periodic review and update.

4.1.g Monitoring and Review

Presently, the Client carries out inspections, audits, and performance evaluations to assess compliance with safety standards and identify areas for improvement via an informal process. These are guided by its ISO Certifications.

Therefore, as part of its ESMS, it will develop and adopt: i) formal protocols for monitoring and auditing of E&S risks; and ii) guidelines to evaluate its impact management performance.

4.1.h Stakeholder Engagement

The Client has developed a Stakeholder Engagement Strategy (“SES”) via Sheriff Security, which summarizes the importance of stakeholder engagement in mitigating risks and maximizing positive impacts. It does not, however, provide specific details on identified Company stakeholders and a formal engagement process.

The Client will therefore update its SES and adopt it as part of its ESMS. The SES will include a proper process for stakeholder mapping for its operations and the Project. A Community Relations Officer (“CRO”) will also be designated.

4.1.h.i Disclosure of Information

The Company has a dedicated website for Sheriff Security²³ alongside respective social media accounts used to share information on its subsidiaries.²⁴ It also engages and communicates with its stakeholders through traditional media channels (e.g., TV, radio, press). These mediums will be similarly utilized for the Project.

As part of its SES, the Client will outline a streamlined information disclosure process to stakeholders which considers their category, level, type of interaction and activity being undertaken.

4.1.h.ii Informed Consultation and Participation

Public consultation and disclosure are not required by the government for the Project. However, given that the site was previously earmarked for the construction of a hospital, the Client carried out informal engagement and consultation with the nearby community. Despite the latter, the Client will: i) conduct and document a follow-up consultation with the community; and ii) revise the SES to outline a formal process for ongoing consultation with the community and other relevant stakeholders. These efforts will be supported by the CRO.

4.1.h.iii Indigenous Peoples

The Project will not generate any material impacts to indigenous communities.

²³ <https://ssgy.net/>

²⁴ <https://www.facebook.com/p/Sheriff-Construction-Inc-61554251952206/> ; <https://www.facebook.com/sheriffssgy/>

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

The Company will be guided by local requirements for any Project components requiring public stakeholder consultations. Such will be determined by the Environmental Protection Agency (“EPA”), Neighborhood Democratic Council (“NDC”), and the Central Housing and Planning Authority (“CHPA”).

4.1.i External Communication and Grievance Mechanisms

Though the Company has previously engaged the nearby community, the process was not formalized. Since there are no specific documented procedures to guide and capture external grievances, the Client will prepare and adopt a Project-specific grievance mechanism.

4.1.i.i External communication

External communications are centered around the dedicated website for Sheriff Security, alongside traditional and social media for all subsidiaries which presents information and news on the Company’s plans and initiatives. These mediums will be applied for the Project.

4.1.i.ii Community grievance mechanism

The ESMS will outline the grievance mechanism 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 SES will outline steps to ensure ongoing reporting to any communities and stakeholders affected by the Company’s operation or the Project. The Client will submit the relevant engagement reports.

4.2 Labor and Working Conditions

4.2.a Working Conditions and Management of Worker Relationships

The Company has a total of 1,254 employees²⁵ and 102 contractors.²⁶ Workforce for the construction and security of the Project will be via Sheriff Construction and Sheriff Security

²⁵ 1220 Sheriff Security;34 Sheriff Construction

²⁶ Sheriff Construction

respectively. Any supplemental construction workers will be sourced locally and from neighboring communities.

As part of the C-ESMP, the Client will provide construction oversight and management details including, but not limited to: i) project team outline with E&S capacity; and ii) policies and procedures for the construction workforce inclusive of a grievance mechanism.

For the operation phase, there will be a core management team of eight (8) persons including the FM.

4.2.a.i Human Resources Policies and Procedures

There are several disaggregated policies and procedures pertaining to employee conduct within the Company, which apply primarily to Sheriff Construction. They include: i) a Code of Ethics; ii) a Conflict-of-Interest Policy; iii) a Disciplinary Policy; iv) a Non-Discriminatory Policy; v) a H&S Manual; vi) a Grievance Procedure; vii) a Drug and Alcohol Policy; viii) the SHP; and ix) Emergency/Escorts Procedure.

To enable a streamlined human resource (“HR”) management system covering its overall operations, the Client will prepare a comprehensive HR Policy Manual for the Company which will include, at minimum, details for the following topics: i) code of conduct; ii) recruitment and selection; iii) compensation and benefits (including medical); iv) termination and resignation; v) working hours, leave categories (including maternity or paternity) and holidays; vi) promotion; vii) existing policies and procedures including grievance resolution, sexual harassment and GBV, and occupational HSE ; viii) performance management; ix) training and development; and x) use of Company property. This manual will be disseminated to all employees and third-party contractors and sub-contractors.

4.2.a.ii Working Conditions and Terms of Employment

General employment and working conditions are guided by local Guyanese labor regulations. Relevant details will be reflected in the HR Policy Manual.

4.2.a.iii Workers’ Organizations

There is currently no declaration concerning freedom of association contained in any of the existing HR policies and procedures. Therefore, the Client’s HR Policy Manual will include reference to collective bargaining and the right to freedom of association.

4.2.a.iv Non-discrimination and Equal Opportunity

According to the Sheriff Security Code of Ethics, all personnel will be treated fairly and without bias, regardless of race, gender, religion, nationality, or other personal characteristics, avoiding any actions that could be construed as discriminatory or disrespectful. This declaration is supported by a standalone Non-Discrimination Policy which applies to all employees, contractors, vendors, clients

and any third-party interacting with Sheriff Security, that prohibits any form of discrimination harassment, or unfair treatment based on gender, ethnicity or race, religion, age, disability, sexual orientation, marital status, or any other topic. Procedures for reporting discrimination, investigation and protection against retaliation are outlined.

The Client's HR Policy Manual will include references to the relevant section of the Code of Ethics and the existing Non-Discrimination Policy.

4.2.a.v Retrenchment

There are no plans for collective dismissals. The Project is anticipated to increase the Company's overall workforce in the long-term.

4.2.a.vi Grievance Mechanism

A Grievance Procedure was prepared for Sheriff Security which applies to all employees, contractors, and stakeholders within the security firm, addressing concerns such as human rights violations, discrimination, harassment, and unethical behavior. It ensures that all individuals have a clear and accessible avenue to voice their concerns, and outlines a summary procedure for submission, preliminary assessment, resolution, and regular training and communication – this includes reference to confidentiality whereby all grievance-related information is treated confidentially with protection for employees from retaliation, thereby ensuring a safe environment for raising concerns.

However, these procedures are limited in Company scope and do not adequately capture descriptions of different grievance categories and assessment procedures linked to wider operations, timing of responses beyond formal reports, options for anonymity, anti-reprisals policy nor dissemination mechanisms. Therefore, as part of the reference to continuous improvement, the Client will update its procedures to include these aspects and will articulate these elements within its ESMS to address internal grievances which further include: i) a description the specific channels for grievance reception; ii) the teams responsible for grievance reception, assessment, and response; and iii) the expected timing of responses.

4.2.b Protecting the Workforce

4.2.b.i Child Labor

According to Guyanese legislation, the minimum age for employment is fifteen (15) years. The Client is guided accordingly. However, there are no provisions against child labor referenced in existing policies and procedures. Hence, the Client will ensure its HR Policy Manual and relevant policies and procedures (including those for contractors) include provisions against the use of child labor.

4.2.b.ii Forced Labor

Guyana has ratified the International Labor Organization's ("ILO") Convention No. 29 on Forced Labor and Convention No. 105 on Abolition of Forced Labor. Although the Client complies with Guyanese labor legislation, there are no provisions against forced labor in existing policies and procedures. Hence, its HR Policy Manual and relevant policies and procedures (including those for contractors) will include provisions against the use of forced labor.

4.2.c Occupational Health and Safety

The H&S Manual for Sheriff Security is prepared per ISO 45001 for delivery of security services to residential and commercial customers. Employees are required to adhere to the various Standard Operating Procedures ("SOPs") as supported by the policies outlined in the H&S Risk Assessment and Emergency Response Register which provides a detailed assessment for the management of identified OHS risks. In addition to the QHSE team and JWSHC, an H&S coordinator is responsible for ensuring compliance with the relevant H&S requirements, while a Managing Director oversees provision of appropriate resources such as personal protective equipment ("PPE"). An established OHS system is summarized in the manual which involves creating a comprehensive framework to manage and enhance H&S in the workplace. H&S topics are communicated through various channels such as signage posted in the workplace, training, induction, and toolbox talks. Though the Company adheres to the local Occupational Safety and Health Act, there are no other formalized procedure documents to guide H&S for subsidiary operations.

The Client will therefore prepare a holistic H&S Policy Manual which will align with its ESMS to include: i) hazards identification for all operations; ii) risk assessment and classification; iii) measures to manage identified risks; iv) regular monitoring of H&S indicators; v) employees safety training plan; vi) procedures for reporting accidents including root cause analysis; and vii) detailed accident investigation procedures (including applicable emergency contact information). It will also implement the relevant recommendations from the H&S assessment and submit annual H&S statistics with root cause analysis for any reported accidents.

During the construction phase of the Project, the Client will ensure implementation of the H&S requirements specified under the construction permit and C-ESMP.

4.2.d Provisions for people with disabilities

Considerations for people with disabilities are referenced under the Code of Ethics and Non-Discrimination Policy. In addition to existing plans reflecting disabled parking, the Client will ensure final designs for the Project include additional features for Universal Access.

4.2.e Workers Engaged by Third Parties

The Client's H&S Manual notes the control for procurement of products and services via a Vendor Management Procedure. This includes documented information for process monitoring, purchase orders, evaluation of contractors, related SOPs and control plans. Contracts are maintained to conform to the H&S management system to ensure requirements are met by contractors and their

workers. Specifically, Sheriff Security coordinates its procurement processes with contractors in order to identify: i) hazards and assess and control the H&S risks arising from contractors' activities and operations that impact the organization; ii) organization's activities and operations that impact the contractors' workers; and iii) contractors' activities and operations that impact other interested parties in the workplace. H&S criteria for the selection of contractors are defined and documented by management.

As these considerations apply only to Sheriff Security, the Client will update its Vendor Management Procedure to cover all operations and prepare contractual clauses for the Company and the Project to ensure that contractors are bound to its general HR, H&S and environmental procedures and policies, and Code of Ethics. These will be reflected in the C-ESMP as part of contractor management details. The Client will also ensure that these provisions are communicated to relevant contractors during the procurement of new services.

4.2.f Supply Chain

As there are no formal processes to guide sustainable supply chain management, 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

The Project will be EDGE Certified and will therefore incorporate several measures to enhance resource efficiency. This will include the use of low-emissivity glass for all façades which will save on energy costs and provide enhance thermal comfort within the building. The inclusion of roof-top solar panels will also be assessed to further enhance energy efficiency. The orientation of the building with the front façade facing west, the rear facing east, and the integration of a skylight at roof level, will capitalize on the use of natural light.

The Client will submit annual reports on its EDGE certification compliance and resource efficiency measures.

4.3.a.i Greenhouse Gases

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

4.3.a.ii Water Consumption

The Project will require water consumption for bathrooms, restaurants and general property maintenance. Potable water will be provided through the municipal water system, but options for water harvesting will be assessed. The Client will also implement water conservation features to

incorporate low consumption and flow urinals and toilets, along with lavatories specified with push or movement sensor to reduce water consumption.

During the construction phase, Sheriff Construction and any associated contractors will be responsible for providing potable water for the Project's needs.

4.3.b Pollution Prevention

The Client does not have a specific set of procedures to guide or monitor pollution prevention for its operations or the Project. Such procedures will be included as part of the ESMS.

4.3.b.i Wastes

The Project, during its construction and operational phases, will generate several types of solid wastes, including, but not limited to: i) general construction and building maintenance waste; ii) bulk packaging, cardboard and plastics; iii) food refuse; iv) electronics and batteries; v) wood, paper, and glass; and vi) landscape cuttings. Liquid waste will be produced mainly from sanitary processes, storm water and wastes from food preparation.

The Client will prepare a waste management plan ("WMP") covering both phases of the Project and all waste streams including but not limited to solid, liquid, and hazardous waste.

4.3.b.ii Hazardous Materials Management

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

4.3.b.iii Pesticide Use and Management

The use of pesticides for the Project may be associated with the operational phase to limit the occurrence of pests which may impact general H&S, especially regarding food establishments. The ESMS will outline steps to: i) maintain a pesticide inventory and a checklist of certified contractors; and ii) not purchase, store, use, or trade in products that fall in WHO Recommended Classification of Pesticides.²⁷

4.4 Community Health, Safety and Security

4.4.a Community Health and Safety

The Project is expected to generate site-specific impacts related to: i) solid and liquid waste generation; ii) noise and vibration disturbance; iii) air and dust emissions; iv) OHS; and v) secondary vegetation clearance. Given surrounding existing and ongoing developmental activities, indirect impacts may be associated with access and traffic disturbance and increased surface run-off. These impacts will be managed via the C-ESMP.

²⁷ According to Hazard Class 1a (extremely hazardous); or 1b (highly hazardous).

Prior to the commencement of civil works, the Client will submit a consultation report demonstrating engagement with the nearby community.

During the Project's operation phase, the Client will manage associated risk through the ESMS, the WMP and other applicable plans and procedures to be developed.

4.4.a.i Infrastructure and Equipment Design and Safety

The Project will be designed with a layout which will enable efficient ventilation. The building will have a steel frame substructure with a foundation incorporating reinforced steel.

The Client will ensure the Project and associated buildings include adequate fire safety systems ("FSS") including, but not limited to, smoke detectors, fire exits, alarm pull stations and extinguishers – along with adequate drainage measures to manage flood risk. Regular training and drills will be conducted.

The Client will also perform regular tests of the FSS to ensure constant operational readiness, including: i) timely recharge of fire extinguishers; ii) periodic fire hose integrity tests; and iii) periodic test of water pump pressure and reach of water jets.

4.4.a.ii Hazardous Materials Management and Safety

Hazardous Materials Management and Safety will be managed through the C-ESMP and WMP.

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

General exposure risk to communicable disease or other illness will be managed through relevant EPA construction and operational permit requirements and the C-ESMP. The Project will also ensure implementation of an HVAC²⁸ system with filters to prevent flow of bacteria in the air, along with constant cleaning and sanitization of common areas.

4.4.a.v Emergency Preparedness and Response

The Client's emergency preparedness and response will be captured via the comprehensive EPR plan in its ESMS and H&S Policy.

²⁸ Heating, ventilation, and air conditioning

4.4.b Security Personnel

Security personnel for the Project will be provided through Sheriff Security whose complement includes armed security. The Company has established procedures to screen, select and train its personnel, along with its Quality Control Manual and the relevant policies regarding Code of Conduct, Discipline, Sexual Harassment, Non-Discrimination, and Drugs and Alcohol. Added security measures for the Project will include CCTV.

For the Project, the Client will submit a security risk assessment to identify internal and external security risks and how these will be managed. This will include details on human rights training in alignment with the Voluntary Principles on Security Forces and Human Rights.²⁹

4.5 Land Acquisition and Involuntary Resettlement

The site has been earmarked for commercial development and is secured via long term lease by the Client with the Government of Guyana. The Project will therefore 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

The Project will not affect any indigenous community, nor will it intersect any indigenous territory.

4.8 Cultural Heritage

The Project will not affect any cultural heritage. However, chance finds procedures will be outlined in the ESMS and C-ESMP.

5. Local Access of Project Documentation

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

Timothy K Babooram
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Tel: + 592 231 0264

²⁹ [Created in 2000, the Voluntary Principles is a multi-stakeholder initiative that promotes the implementation of a set of principles that guide companies on providing security for their operations while respecting human rights.](#)