PROTON ENERGY LIMITED HEALTH, SAFETY & ENVIRONMENT POLICY

The long-term business success of Proton Energy depends on our ability to continually improve the quality of our services and products while protecting people and the environment.

Emphasis must be placed on ensuring human health, operational safety, environmental protection, quality enhancement, and community goodwill. This commitment is in the best interests of our customers, our employees and contractors, our stockholders, and the communities in which we live and work.

Proton Energy requires the active commitment to, and accountability for, QHSE from all employees and contractors. Line management has a leadership role in the communication and implementation of, and ensuring compliance with, QHSE policies and standards. We are committed to

- Protect, and strive for improvement of, the health, safety and security of our people at all times;
- Eliminate Quality non-conformances and HSE accidents;
- Meet specified customer requirements and ensure continuous customer satisfaction;
- Set Quality & HSE performance objectives, measure results, assess and continually improve processes, services and product quality, through the use of an effective management system;
- Plan for, respond to and recover from any emergency, crisis and business disruption;
- Minimize our impact on the environment through pollution prevention, reduction of natural resource consumption and emissions, and the reduction and recycling of waste;
- Apply our technical skills to all HSE aspects in the design and engineering of our services and products;
- Communicate openly with stakeholders and ensure an understanding of our QHSE policies, standards, programs and performance. Reward outstanding QHSE performance;
- Liaise with all community stakeholders and have competent CLO’s handle all community relations and keep the interest of both parties in view;
- Improve our performance on issues relevant to our stakeholders that are of global concern and on which we can have an impact, and share with them our knowledge of successful QHSE programs and initiatives.

The environment is of major concern to Proton Energy in all of its activities.

Proton Energy upholds the United Nations Global Compact Charter & the Rio declaration on Environment and Development and strives to minimize the company’s environmental footprint.
Towards this end Proton Energy undertakes to:

- Ensure regulatory requirements and Proton Energy standards are respected by executing periodic environmental reviews and by deploying environment management systems at all sites;
- Comply with regulatory requirements and clients’ requirements relating to the protection of the environment;
- Communicate environmental impact assessment & reporting to Proton Energy’s main stakeholders (including employees and customers);
- Develop and implement training and education programs on the environmental protection good practices for all employees;
- Reduce waste production and promote and maximize recycling and the traceability of ultimate waste products;
- Minimize the release of pollutants into the air, water or soil as far as possible;
- Reduce emissions, noise, dust, odor and other elements that may damage the environment;
- Reduce the company’s energy consumption in accordance with regularly updated targets, enhance employee awareness of the rational use of energy and use renewable energy sources where feasible;
- Maintain the ongoing objective of continuously improving the company’s environmental performance;
- Assess specific risks and implement a crisis management plan for emergency pollution situations; periodically review and improve this plan.

Proton Energy sustainable development policy is at the core of company’s governance strategy to achieve responsible economic growth, environmental footprint mitigation and social progress.

The three pillars of sustainable development that have to be properly balanced are People, Profit and Planet.

In order to support its commitments Proton Energy upholds the United Nations Global Compact Charter and its fundamental principles and is committed to:

- Acting with:
  - Transparency: communicating on overall strategy; financial & business accountability; reporting actions;
  - Consistency: taking into account Proton Energy’s stakes & stakeholders, communicating regularly with its stakeholders (including employees and clients) regarding the company’s activities and performance in
the area of sustainable development (social, environmental and economic aspects);

- Responsibility: respecting its stakeholders’ fundamental rights (The Universal Declaration of Human Rights & the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work).

- Creating greater economic value while complying with our business conduct code and ethical policy, implementing and promoting anti-bribery & anti-corruption practices.

- Operating in harmony with its natural environment and communities neighboring worksites:
  - Towards neighboring Communities
    - Striving to develop local employment;
    - Complying with local legislation.
  - Natural environment
    - Minimizing the production of waste in general, recycling and/or re-processing for re-use wherever feasible;
    - Improving the company’s energy efficiency by reducing the energy consumption of Proton Energy’s construction and maintenance operations;
    - Reducing harmful greenhouse gas emissions produced by vehicle fleets and facilities and improving the preventive maintenance of both Proton Energy’s and our clients’ plant and equipment.
    - Providing its employees with opportunities to involve themselves in the improvement of Proton Energy’s performance by enhancing awareness and providing training in the area of sustainable development.

Legal, Regulatory and Administrative Frameworks

The legal, regulatory and administrative frameworks upon which this Policy was developed;

- NESREA Act of 2007;
- Electricity Power Sector Reform Act, 2005;
- Energy Commission of Nigeria Regulation, 1988;
- Delta State Ministry of Environment Requirements;
- PEL policies on quality, health, safety, and environment (QHSE); and

- Other applicable national and international guidelines and conventions.
Nigerian Social Legislation

Nigerian social legislation relevant to our Policy is

- **Factories Act (Act of 1990):** The Factories Act is the primary law regulating the Health, safety and welfare of workers in the factories and sets out accountability for Violations of the provisions in the Act.

- **Labor Act (1990):** The Labor Act is the main piece of legislation protecting the employment rights of individual workers and it includes matters such as classification.

- **Employees Compensation Act 2011 ("ECA").** The ECA replaced the Workmen’s Compensation Act ("WCA"), basically to address the shortcomings of the WCA. ECA is applicable to all categories of workers. Under ECA, an employee will be entitled to compensation where such employee suffers an injury or dies regardless of whether such was attributable to the employee’s fault or not.

World Bank and International Standards Applicable

- **World Bank OP 4.03 - Performance Standards for Private Sector Activities (WB Performance Standards) (May 2012);**

- **Multilateral Investment Guarantee Agency’s Performance Standards on Social & Environmental Sustainability (October, 2007);**


- **World Bank Group Environmental Health and Safety Guidelines for Thermal Power Plants (2008);**

- **World Bank Group Environmental, Health and Safety Guidelines for Electric Power Transmission and Distribution (2007);** and

- **World Bank Group Environmental, Health and Safety Guidelines for Onshore Oil and Gas Development (2007).**
This Policy shall be regularly reviewed to ensure ongoing suitability. The commitments listed are in addition to our basic obligation to comply with Proton Energy standards, as well as all applicable laws and regulations where we operate. This is critical to our business success because it allows us to systematically minimize all losses and adds value for all our stakeholders.