

ENVIRONMENTAL POLICY

Environmental Management System (EMS)

MNT GROUP LIMITED - Health, Safety & Environment

MNT-EMS-POL-001 | Version 1.0 | Approved by the Chief Executive Officer

"PROTECTING THE ENVIRONMENT WE OPERATE IN"

MNT Group Limited is committed to protecting the environment across every division, project and site on which we operate. This Environmental Policy defines how we prevent pollution, comply with the law, conserve natural resources and continually improve our environmental performance as part of our Environmental Management System. It applies to everyone who works for, or on behalf of, the Group - employees, contractors, suppliers and visitors alike.

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1 POLICY STATEMENT

MNT Group Limited recognises that its activities - including electrical materials supply, electrical contracting, energy-sector services, and infrastructure project delivery - have the potential to interact with the environment. We are committed to conducting our operations in a manner that prevents pollution, conserves natural resources, and contributes to the sustainable development of Tanzania and the wider region in which we operate.

We believe that environmental protection is a shared responsibility. Every employee, contractor and partner of MNT Group has a role to play in minimising our environmental footprint while we continue to deliver outstanding value to our customers.

NOTE

Our Environmental Commitment: to prevent pollution, comply with all applicable environmental laws, conserve resources, manage waste responsibly, and continually improve our environmental performance - across every project, every site, and every day of operation.

2 SCOPE OF APPLICATION

This Policy applies to all activities, products and services of MNT Group Limited, including:

- All offices, warehouses and storage facilities operated by MNT Group
- All project sites where MNT Group personnel or contractors are working - including customer premises, oil & gas installations, power facilities, and infrastructure construction sites
- All transport and logistics activities undertaken on behalf of MNT Group
- All employees, contractors, sub-suppliers and visitors working under our control
- All five divisions of the Group: MNT Energy, MNT Electrics, MNT Contracting, MNT General Trading and MNT Consulting

3 LEGAL & REGULATORY FRAMEWORK

MNT Group complies with all applicable Tanzanian environmental legislation, including but not limited to:

- Environmental Management Act, 2004 (EMA) - the overarching environmental legislation
- Environmental Impact Assessment and Audit Regulations, 2005
- Environmental (Solid Waste Management) Regulations, 2009
- Environmental (Hazardous Waste Control and Management) Regulations, 2009
- Atmospheric Pollution (Control) Regulations, 2007
- Water Resources Management Act, 2009
- Occupational Safety and Health Act, 2003 (OSHA) - environmental workplace provisions
- National Environment Management Council (NEMC) directives applicable to our sector
- Customer-specific environmental requirements applicable to individual project sites

IMPORTANT

Non-compliance with Tanzanian environmental legislation may attract significant fines, project shutdowns, and legal proceedings against the Company and the individuals responsible. Compliance is not optional.

4 MANAGEMENT COMMITMENTS

The Management of MNT Group Limited commits to:

- Establishing, implementing and maintaining an Environmental Management System aligned with the principles of ISO 14001:2015
- Complying with all applicable environmental laws, regulations and customer environmental requirements as a minimum standard
- Identifying, evaluating and managing the environmental aspects and impacts of our activities, products and services
- Preventing pollution at source through good design, equipment selection and sound operating practices
- Conserving natural resources by reducing energy and water consumption and minimising the use of raw materials
- Applying the waste hierarchy - reduce, reuse, recycle, recover, dispose - in that order of priority
- Managing hazardous materials (including oils, fuels, batteries, chemicals and electronic waste) in strict accordance with regulations and good practice

- Selecting suppliers and subcontractors who share our environmental commitments and demonstrate them through their own practices
- Setting measurable environmental objectives and targets, and reviewing performance against them at planned intervals
- Providing employees with the information, training and resources required to perform their work in an environmentally responsible manner
- Investigating environmental incidents thoroughly and implementing corrective and preventive actions to prevent recurrence
- Communicating openly with employees, customers, regulators and the communities in which we operate
- Continually improving our environmental performance

5 ENVIRONMENTAL OBJECTIVES

MNT Group establishes the following measurable environmental objectives. These are translated into specific departmental and project-level targets that are reviewed at least annually:

Objective	Indicator	Target
Compliance	Environmental compliance breaches	Zero
Pollution prevention	Reportable spills or environmental incidents	Zero
Hazardous waste	% disposed via licensed contractors with documented evidence	100%
Waste segregation	% of waste segregated and diverted from landfill	Year-on-year increase
Energy efficiency	Office electricity consumption per employee	Year-on-year reduction
Vehicle emissions	Fleet maintenance compliance with service schedule	100%
Awareness	Employees receiving environmental induction	100%
Supplier engagement	Critical suppliers assessed for environmental practices	>= 80%

6 SIGNIFICANT ENVIRONMENTAL ASPECTS

MNT Group has identified the following environmental aspects as relevant to our operations. These are managed in accordance with the Environmental Aspects & Impacts Procedure (MNT-EMS-PRO-001):

Activity	Environmental Aspect	Potential Impact
Office operations	Electricity, paper and water consumption	Resource depletion, GHG emissions
Warehouse operations	Packaging waste, lighting energy	Landfill use, energy consumption
Site installations	Cable offcuts, conduit, packaging waste	Waste generation, landfill
Vehicle fleet	Fuel use, exhaust emissions	Air pollution, GHG emissions
Battery / lamp disposal	Heavy metals, mercury, lithium	Soil & water contamination
Spills (oils, fuels, paints)	Hydrocarbon and chemical release	Soil & water contamination
Generator operations	Diesel use, exhaust gases, noise	Air & noise pollution
E-waste (old equipment)	Hazardous components	Soil & water contamination
Cable & wire disposal	Copper, plastics, insulation materials	Landfill, lost recovery value

7 ROLES & RESPONSIBILITIES

7.1 Chief Executive Officer

- Provides overall leadership and accountability for environmental performance
- Approves the Environmental Policy and the Environmental Objectives
- Ensures adequate resources are allocated to environmental management

7.2 Operations Director

- Owns the Environmental Management System on behalf of Top Management
- Ensures environmental objectives are set, communicated, achieved and reported
- Reviews environmental performance with the leadership team at quarterly Management Reviews
- Ensures environmental considerations are integrated into project planning and operational decisions

7.3 HSE Officer (Designated Environmental Representative)

- Acts as the day-to-day focal point for environmental management
- Maintains the Register of Environmental Aspects, Impacts and Legal Requirements
- Conducts environmental risk assessments and audits
- Coordinates environmental training and awareness for all personnel
- Investigates environmental incidents and tracks corrective actions to closure
- Liaises with NEMC, OSHA and customer environmental teams as required
- Maintains records of waste transfers, disposal certificates and licensed contractors

7.4 Project Managers and Site Supervisors

- Implement this Policy and project-specific environmental requirements at site level
- Ensure waste is segregated, stored and disposed of in accordance with the on-site waste plan
- Brief teams on environmental hazards and required controls before work commences
- Report environmental incidents and near-misses immediately to the HSE Officer
- Ensure adequate spill response equipment is available where work involves liquids that could cause contamination

7.5 Procurement and Supply Chain Officer

- Considers environmental criteria when selecting suppliers and subcontractors
- Ensures preference is given, where commercially viable, to products and services with reduced environmental impact
- Maintains records of environmental compliance evidence supplied by critical suppliers

7.6 All Employees and Contractors

- Comply with this Policy and all environmental procedures
- Use resources efficiently - switch off lights and equipment when not in use, fix leaks, avoid waste
- Segregate waste at source according to the on-site waste plan
- Report spills, leaks and other environmental concerns immediately
- Participate in environmental training and tool-box talks
- Take reasonable care not to cause environmental harm through their actions or omissions

8 SITE-SPECIFIC ENVIRONMENTAL CONTROLS

For all project sites - particularly those operated by customers in the petroleum, power generation and major infrastructure sectors - MNT Group will:

- Comply with the customer's site-specific environmental rules, permits and conditions at all times
- Develop project-specific Environmental Management Plans where required by contract

- Use only NEMC-approved contractors for hazardous waste collection and disposal, retaining transfer notes and disposal certificates as evidence
- Provide spill response equipment (drip trays, absorbents, spill kits) where work involves substances that could cause contamination
- Ensure mobile equipment, generators and vehicles are well-maintained to minimise emissions, fluid leaks and noise
- Conduct environmental tool-box talks before commencing work in environmentally sensitive areas (e.g. near water bodies, fuel handling areas, populated communities)
- Restore work areas to an acceptable condition on demobilisation

9 HAZARDOUS MATERIALS & WASTE MANAGEMENT

Hazardous materials handled in the course of MNT Group's operations may include - but are not limited to - used oils and lubricants, paint thinners, solvents, batteries (lead-acid and lithium), fluorescent tubes and lamps, and electronic waste.

All hazardous materials are managed in strict accordance with the Environmental (Hazardous Waste Control and Management) Regulations, 2009. The HSE Officer maintains records of:

- Quantities and types of hazardous materials handled and stored
- Approved storage locations, segregation arrangements and labelling
- Authorised disposal contractors and their NEMC permits
- Waste transfer notes (chain-of-custody documentation)
- Certificates of disposal from licensed treatment / disposal facilities
- Material Safety Data Sheets (MSDS) for hazardous substances on site

10 ENVIRONMENTAL TRAINING & AWARENESS

Environmental awareness is built into MNT Group's training framework at multiple levels:

- New-starter induction - general environmental awareness, waste segregation and spill-response basics
- Project mobilisation briefings - site-specific environmental requirements and customer rules
- Tool-box talks during projects - recurring reminders and lessons learned from incidents
- Annual refresher training for all field-based personnel
- Specific competence training for those handling hazardous materials, operating fuelled equipment, or working in environmentally sensitive areas
- Environmental incident-response drills, where applicable

11 MONITORING, MEASUREMENT & REPORTING

Environmental performance is monitored through:

- Monthly tracking of environmental KPIs (incidents, near-misses, training completion, waste disposal records)
- Site-level environmental inspections by Project Managers and the HSE Officer
- Annual review of significant environmental aspects and the legal register
- Reporting of environmental performance to top management at quarterly Management Reviews
- Reporting of incidents to NEMC, OSHA and customers in accordance with applicable legal and contractual reporting timelines
- Internal audits of environmental management practices

12 COMMUNICATION

This Policy is communicated to:

- All employees during induction; copies are displayed at all offices and major project sites
- Subcontractors and suppliers as part of the pre-contract documentation
- Customers and other interested parties on request and as part of pre-qualification submissions

External communications relating to environmental matters - including regulatory notices, customer enquiries and community engagement - are coordinated by the Operations Director.

13 REVIEW OF THIS POLICY

This Policy will be reviewed annually by the Operations Director and approved by the Chief Executive Officer. An earlier review may be triggered by:

- Significant changes in environmental legislation
- Significant changes in operations, products or services
- Significant environmental incidents or non-compliances
- Customer or stakeholder feedback
- Outcomes of internal audits or management reviews

NOTE

This Environmental Policy shall be reviewed annually, or following any significant change in business activity, regulation, customer requirement, or environmental incident.

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MNT Group Limited - Registered office: House No. 3, Jangwani Beach, Dar es Salaam, Tanzania 11108, with operations in Dubai, UAE. Tel: +255 750 000 055 | Email: info@mntgroup.net