

Environmental and Labor Issues:

This is a category III project according to the IIC's environmental and labor review procedure because it could produce certain effects that may be avoided or mitigated by following generally recognized performance standards, guidelines, or design criteria. The main environmental and labor considerations related to the project are the Company's environmental management, occupational health and safety, labor practices, and pollution prevention and abatement.

The Company's environmental management: Access has a designated manager for environment, health, and safety issues. The Company has begun work on nine upgraded or new communication towers. No critical habitats or protected areas are located in the project area. The towers to be constructed are in sites already used for towers by other companies (cellular operators); therefore, permits are not required at this time. The tower construction standards follow the standards used in the United States. The network design corresponds to the standards of the U.S. Federal Communications Commission (FCC) and the International Telecommunication Union (ITU, the United Nations Agency for information and communication technology issues).

Although the Project will have a limited impact on vegetation, the Company will carry out a program to restore the area's natural vegetation. Access to the construction sites will be using existing access roads, as the sites are already used for towers. Where road modification or upgrades are necessary, access roads will be constructed with the slope of the road into the hillside and with a raised outer edge adequate to control run-off until it slows and is directed to existing natural drainage. The ecological impact is expected to be minimal, and the potential negative impacts can be readily identified and appropriately managed by measures incorporated into project design.

Access will develop an Environmental and Social Action Plan that summarizes the procedures or activities that need to be carried out to ensure compliance with local environmental and social requirements as well as those of the IIC.

Occupational Health and Safety: Procedures are in place to cover common risks during construction and operation of any facility. Workers receive specific training to assess safety risk in their duties. Employees and contractors follow the standard safety practices of the construction industry during construction and the standards of the FCC and ITU regarding maintenance and operations. The design and installation of tower structures and other facilities are according to good international industry practices, taking into account the potential frequency and magnitude of natural hazards (e.g. earthquakes, hurricanes). In fact, each tower is designed to sustain the highest wind load anticipated in the region according to ANSI/TIA-222 Rev. G standards used in the United States. Those towers that are not up to standards are currently being repaired or replaced.

The Company has a safety program in place and measures are being implemented in order to address the protection of workers against occupational exposure to electromagnetic fields due to working in proximity to high-voltage power lines, transmitting antennas emitting radio waves and microwaves. For example, high power antennas and other potential sources of harmful radiation are installed in such a fashion that tower workers do not climb in the path of the transmission; for maintenance of the equipment, it is shut down prior to beginning work. Access ensures that all of its employees are provided with health and safety training and appropriate personal protective equipment. Contractors are under regular supervision to ensure compliance with applicable health and safety standards. In order to address the cholera outbreak in Haiti, clean bottled water is provided for all Company employees. Hydrogen peroxide and chlorine, which are widely used as disinfectants, have also been provided. The Company has on hand a large quantity of first aid supplies and antibiotics in the case any employees are symptomatic.

Labor Practices and Social Issues: Access follows the Code de Travail (Labor Code) as published by the Haiti Ministry of Labor. The Company has labor agreements with individual employees. Responsibilities and compensation are outlined in these documents.

Pollution Prevention and Abatement: Some operation and maintenance activities may result in the generation of wastes such as electronic wastes (nickel-cadmium batteries and printed circuit boards from computers and other electronic equipment); waste oils, and used filters generated from the operation of backup generators and service vehicles, etc. Access has implemented measures to prevent pollution regarding those issues. For example, the Company recycles their batteries and circuit boards, and uses authorized contractors that recycle the oils, batteries and filters.

Monitoring and Annual Reporting: Access will submit a yearly environmental report summarizing monitoring data on its environmental management, occupational health and safety, labor practices, and pollution prevention and abatement measures. During the life of the project, the IIC will monitor ongoing compliance with its own environmental and labor review guidelines by evaluating monitoring reports submitted annually and by conducting regular field visits as part of the project supervision process.