

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: Wind has a designated manager for environment, health, and safety issues. In addition, the Company has in place elements of an Environmental and Social Management System (ESMS). The Company carries out an environmental assessment of each tower site chosen and is required to obtain an environmental permit to comply with local environmental requirements. As part of this assessment process, public consultation with local communities is also included. The Company will not be constructing in any sensitive areas. In addition, approximately 50% of the towers will be co-located on leased land run by other operators, such as cable networks and transmission tower sites. As Wind will be outsourcing construction of new tower sites, it will ensure that the construction contracts include environmental, health, and safety terms. Wind will also monitor compliance with those terms and require improvement in the event that noncompliance is detected.

Wind will develop an Environmental and Social Action Plan that summarizes any additional 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 and the IFC.

Occupational Health and Safety: Wind will ensure that all of its employees are provided with health and safety training and appropriate personal protective equipment. Wind will also periodically inspect its contractors to ensure compliance with applicable standards.

Labor Practices: Wind shall comply with Dominican labor legislation and the core labor standards of the International Labour Organization, such as the right to organize and the right to collective bargaining, the prohibition of forced labor, and a child labor code that protects children and sets a minimum working age. Wind has a written human resources policy and procedures and is in the process of finalizing procedures to handle employee grievances in accordance with IIC and IFC requirements.

Community Relations: Wind has procedures in place for consulting with local community members and disclosing relevant facts regarding proposed new sites. In order to obtain the permit necessary to construct a tower, the Company is also required to consult with the local communities. The Company will submit to the IIC written procedures for handling and resolving complaints or grievances received from community members regarding any site. The Company, in conjunction with the government, is also offering free educational channels to local schools, the number of which is projected to increase significantly.

Pollution Prevention and Abatement: Wind is in the process of constructing secondary containment structures around all fuel tanks at all of the Company's sites, such that each structure is able to contain more than 100% of the volume of the tank. The Company will also require that its contractors comply with the relevant local environmental, health, and safety standards, as well as those of the IFC and IIC. Wind also has an energy management program in place to maximize energy efficiency and to raise awareness among Company employees. The Company will recycle as many materials as possible.

Monitoring and Annual Reporting: Wind 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.