

ENVIRONMENTAL, SOCIAL AND COMPLIANCE POLICY

Flash Motors Company Limited

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4. Compliance and Governance
5. Implementation and Monitoring
6. Environmental and Social Management System (ESMS)
7. Environmental and Social Compliance Report (ESCR) Template
8. Conclusion



Flash Motors Company Limited is committed to conducting business in an environmentally sustainable, socially responsible, and legally compliant manner. This policy outlines our approach to environmental stewardship, social responsibility, and regulatory compliance in our operations in Jamaica.

2. Environmental Policy

Flash Motors recognizes its responsibility to minimize environmental impact and promote sustainability. We are committed to:

- Reducing waste and improving energy efficiency in our office operations.
- Implementing responsible disposal practices for automotive waste materials.
- Encouraging the use of eco-friendly and sustainable business practices.
- Complying with all applicable environmental regulations in Jamaica.

3. Social Responsibility

Flash Motors is dedicated to fostering a positive workplace culture and contributing to the well-being of our community. Our commitments include:

- Providing a safe, inclusive, and respectful workplace for all employees.
- Supporting employee development and fair labor practices.
- Engaging with the local community through outreach and support initiatives.
- Encouraging ethical business practices and corporate social responsibility.

4. Compliance and Governance

We adhere to all legal and regulatory requirements governing our business in Jamaica. Our compliance commitments include:

- Ensuring full adherence to labour laws, tax regulations, and business licensing requirements.
- Upholding transparent financial and operational practices.
- Conducting business with integrity and in accordance with anti-corruption laws.
- Regularly reviewing and updating policies to align with evolving legal and ethical

To ensure the effectiveness of this policy, Flash Motors will:

- Educate employees on environmental, social, and compliance obligations.
- Monitor compliance with relevant policies and regulations.
- Continuously seek opportunities to improve sustainable and responsible business practices.

6. Environmental and Social Management System (ESMS)

Flash Motors has developed a foundational ESMS appropriate to its operational scale and context.

ESMS Objectives:

- **i)** Identify and manage any environmental and social (E&S) risks and impacts.
- **ii)** Receive, respond to, investigate, address, and document grievances from communities and other external stakeholders.

Governance and Oversight

- **E&S Officer (or designate)** is responsible for:
 - Implementing and updating the ESMS.
 - Maintaining compliance registers.
 - Coordinating internal audits and external reporting.
 - Reporting quarterly to the Chief Executive Officer.
- **All staff** are responsible for:
 - Following E&S protocols.
 - Reporting observed E&S concerns to the E&S Officer immediately.

E&S Risk Identification and Management Procedures

Risk Area	Procedures for Managing Impact	Responsible Party
Waste Disposal	<ul style="list-style-type: none"> - Identify all waste streams (e.g., packaging, batteries, fluids). - Engage licensed waste disposal contractors. - Maintain disposal records and certificates. - Conduct quarterly waste reviews. 	E&S Officer
Noise and Emissions (future risk)	<ul style="list-style-type: none"> - Conduct initial noise and emission baseline assessments. - Schedule periodic monitoring once operations begin. 	

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Procedures for Managing Impact

Community Relations	- Ensure all equipment meets emission standards.	
	- Provide contact section on the website for E&S feedback.	
	- Hold stakeholder meetings as needed to address concerns.	E&S Officer and Chief Executive Officer
	- Develop a Community Engagement Plan once operations scale.	

Waste Management Procedures

1. Waste Stream Identification, Disposal Methods, and Frequency

Waste Type	Description	Disposal Method	Frequency	Responsible Party
Used Automotive Fluids (engine oil, brake fluid, transmission fluid, coolant)	Residual fluids from vehicle servicing or maintenance	<ul style="list-style-type: none"> - Stored in clearly labeled, sealed drums in a secure, ventilated area with spill containment. - Collected by a licensed hazardous waste transporter (NSWMA/NEPA registered). - Disposal through approved recycling or incineration facility. 	Monthly or as full drum capacity is reached	Service and Parts Manager with E&S Officer oversight
Used Oil Filters	Contaminated solid waste from oil changes	<ul style="list-style-type: none"> - Drained and stored in leak-proof containers. - Collected with used oil by certified contractor. - Disposed of as hazardous waste. 	Monthly	Service and Parts Manager
Used Batteries (Lead-Acid or Lithium)	From electric vehicles, UPS systems, or equipment	<ul style="list-style-type: none"> - Stored upright in a cool, dry area in battery trays. - Collected by licensed e-waste or battery recycler. - Tracked through disposal manifests. 	Quarterly or upon accumulation of 10 units	Service and Parts Manager

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Packaging Waste (cardboard, plastics, Styrofoam)	From shipping and parts inventory	<ul style="list-style-type: none"> plastics) sent to local recycling facility. - Non-recyclables disposed via municipal waste service. - Stored securely. 	Weekly	Parts Manager with E&S Officer oversight
Electronic Waste (obsolete equipment, cables, printers)	From office or workshop equipment	<ul style="list-style-type: none"> - Donated or collected by certified e-waste handler. - Documented with transfer records. - Bagged and disposed 	Bi-annually or as needed	Service and Parts Manager with E&S Officer oversight
General Waste (office and admin areas)	Non-hazardous waste from daily operations	<ul style="list-style-type: none"> of via approved municipal collection. - Labeled bins used throughout facility. 	2-3 times weekly (based on need)	E&S Officer
Scrap Metal & Vehicle Parts	Damaged or replaced mechanical parts	<ul style="list-style-type: none"> - Stored in a designated metal bin. - Sold to licensed scrap dealers or removed by recycling partner. - Stacked in designated area. 	Monthly or when bin is full	Service and Parts Manager
Tires (Waste Tyres)	Used or damaged vehicle tires	<ul style="list-style-type: none"> - Collected by authorized tire recycling company or returned to supplier (where take-back scheme exists). - Stored in original containers with proper labels. 	Quarterly	Service and Parts Manager
Cleaning Chemicals	Expired or unused chemicals	<ul style="list-style-type: none"> - Disposed via hazardous waste contractor. 	As needed	Janitorial Services Provider under E&S Officer oversight

Date Received	Complainant (Optional)	Issue Category	Description of Grievance	Status	Resolution Date	Actions Taken
YYYY-MM-DD	[Name/Anonymous]	Workplace Conflict	Description of concern	Open/In Progress/Resolved	YYYY-MM-DD	Steps taken to resolve
YYYY-MM-DD	[Name/Anonymous]	Harassment	Description of concern	Open/In Progress/Resolved	YYYY-MM-DD	Steps taken to resolve
YYYY-MM-DD	[Name/Anonymous]	Compensation Issue	Description of concern	Open/In Progress/Resolved	YYYY-MM-DD	Steps taken to resolve

Community Grievance Mechanism:

Procedure:

- Website grievance portal will collect external complaints.
- E&S Officer logs and acknowledges all submissions within 5 business days.
- Investigations are completed within 15 business days.
- Resolution actions are documented and feedback is provided to the complainant.
- **Responsible Party:** E&S Officer (or appointed designate).

Labor and Working Conditions

Flash Motors recognizes the importance of maintaining a safe, equitable, and compliant work environment. Oversight of all labor-related policies and practices falls under the **Human Resources & Compliance Officer**, who reports directly to the Managing Director

Governance

- **Human Resources & Compliance Officer (HRCO)** oversees:
 - Employment policies and contracts.
 - Workplace behavior and grievance handling.

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Labor Matter	Procedures for Managing Impact	Responsible Party
Employment Terms & Conditions	<ul style="list-style-type: none"> - Maintain up-to-date HR Policy manual. - Issue signed contracts and employee handbook. - Monitor legal updates for necessary policy revisions. 	Office Manager
Workplace Communication	<ul style="list-style-type: none"> - Conduct regular team briefings and written updates. - Maintain email communication logs for policy and benefit changes. 	Office Manager
Hiring & Diversity	<ul style="list-style-type: none"> - Post roles transparently. - Promote local hiring and gender balance. - Document recruitment and selection outcomes. 	Office Manager
Employee Grievances	<ul style="list-style-type: none"> - Provide anonymous and open channels to report grievances. - Maintain grievance log with issue categories and outcomes. - Resolve all issues within 30 days of receipt. 	Office Manager
Occupational Health & Safety (OHS)	<ul style="list-style-type: none"> - Maintain and inspect safety equipment. - Conduct emergency drills and training. - Record and investigate all incidents. 	Service and Parts Manager with E&S Officer oversight

Pollution Prevention and Abatement

Environmental performance oversight is assigned to the **E&S Officer or designate**, who is responsible for ensuring pollution prevention and legal compliance. The officer coordinates closely with facility operations and relevant government agencies.

Pollution Control Procedures

Aspect	Procedures for Managing Impact	Responsible Party
Waste Management 5-7 Orchard Road Kingston 5, St. Andrew, Jamaica info@flash-motor.com www.flash-motors.com	<ul style="list-style-type: none"> - Catalog all waste types upon operational start. - Contract NEPA-licensed disposal agents. - Maintain disposal manifests and certificates. - Quarterly compliance review. 	

**Permit
Compliance**

- Conduct safety checks on fuel tanks and electricals.
- Monitor operational changes that may require permits.
- Maintain a Compliance Register for NEPA, MOH, and Parish Council licenses.
- Submit renewals in advance of expiry.

E&S Officer and Chief
Executive Officer

6. Environmental and Social Compliance Report (ESCR) Template

Executive Summary This Environmental and Social Compliance Report (the ESCR) has been prepared by Flash Motors Company Limited in accordance with the reporting requirements outlined by IDB Invest. It outlines the company’s environmental and social (E&S) performance and compliance during the monitoring period. The report is aligned with IDB Invest’s E&S policies and procedures, the World Bank Group / IFC performance standards, and the fundamental labor standards of the ILO.

Flash Motors is committed to responsible operations and sustainability. During this reporting period, no major E&S incidents occurred, and the company continued to strengthen its Environmental and Social Management System (ESMS), engage with stakeholders, and promote workplace safety and inclusive labor practices.

INTRODUCTION

Project Status Flash Motors is currently in its operations phase. The company has met its compliance requirements with Jamaican environmental authorities and maintains updated permits for all operational activities. There were no significant delays or operational disruptions during the reporting period.

Significant Events No major environmental or social incidents were reported during the monitoring period. There were no fires, explosions, hazardous material spills, or fatalities. There were no issues attracting significant external attention or causing legal or reputational risk to the company.

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community engagement protocols. These actions have been implemented.

Organizational Structure Changes: The company established an EHS Committee chaired by the Operations Manager. A Compliance Officer was hired to support ESMS implementation.

New Initiatives:

- Waste minimization and battery recycling pilot initiated.
- Quarterly energy and water usage tracking commenced.
- Sustainability reporting framework in development.

Notices or Fines: No violations or fines were issued by local authorities during the reporting period.

Community Engagement: Two community engagement sessions were held, focusing on employment opportunities and environmental awareness. Feedback was documented and integrated into operations.

Relationships with Groups of Interest: Regular updates are provided to local parish councils and community groups. No conflicts or disputes reported.

Induced Immigration: There is no evidence of induced immigration in the project area.

Community Grievances: No formal grievances were filed during the reporting period.

PS2: LABOR AND WORKING CONDITIONS

HR Policy Changes: Updated policy to include gender-neutral hiring practices and strengthen anti-harassment procedures.

Worker Communication: Revised employee handbook circulated. Staff meetings held monthly to discuss working conditions.

Collective Bargaining: No new collective agreements. No disputes during the period.

Labor Audits: No external audits conducted. Internal HR compliance check completed with no

- Total Man-hours Worked:

Grievances: _____ grievances were received and resolved internally. No pending issues.

Retrenchment: No retrenchment during this period.

Hiring Process: Hiring followed approved HR procedures. ___ new hires, ___ of whom are from the local community.

Occupational Health and Safety (OHS):

- Fire safety and equipment handling procedures updated.
- PPE training conducted for all employees.

Workplace Monitoring: Monitoring conducted quarterly at maintenance and assembly areas. All results within acceptable IFC and national limits.

Parameter	IFC (TLV-TWA)	Country Limit	Measured Value	Locations
Particulates (Dust)	10 mg/m ³	10 mg/m ³	6–8 mg/m ³	Service Bay
Noise	85 dB	85 dB	72–78 dB	Office & Workshop
Heat Exposure	<30°C	<30°C	28–30°C	Service Bay

Risk Mitigation Implementation: Safety guards installed on equipment. Chemical safety posters displayed. Eye wash stations installed.

Emergency Response: Monthly equipment checks performed. Two emergency response drills held.

Specialized Training: Conducted training in chemical handling and electric vehicle fire suppression.

Incident Statistics:

- Employee Accidents:
- Contractor Accidents:

Occupational Health Monitoring:

Condition	Number of Cases	Remarks
Skin diseases	0	
Respiratory conditions	0	
Poisoning	0	
Disorders due to physical agents	0	
Repetitive trauma disorders	0	
Cancers/blood disorders	0	
Stress-related disorders	0	
Noise-induced hearing loss	0	

Drug and Alcohol Program: Random testing initiated. No positive results reported.

KPI Status Summary:

- Noise Tests Scheduled: / Performed:
- Health Campaigns:
- Emergency Drills:
- Trainings: / Completed:

Operational Safety:

Activity	Frequency	Dates Performed	Observed Deficiencies	Corrective Actions
Fire Drills	Quarterly		None	N/A
Fire System Certification	Annual		None	N/A
Fire Extinguisher Inspection	Monthly			
Storage Tank Inspection (Diesel Tank)	Biannual			
Emergency Response Drill (EV Fire Scenario)	Biannual		None	N/A

PS3: POLLUTION PREVENTION AND ABATEMENT

Hazardous Waste:

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Use also
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Annual Amount (kg) Storage Method

Present Yr Previous Yr

Used motor oil 400 Drums, secondary containment



Type	Annual Amount (kg)	Storage/Treatment	Disposal Method	Present Yr	Previous Yr
Cardboard	1,200	Compacted	Recycling	✓	✓
Plastic packaging	800	Bagged & stored securely	Municipal waste	✓	✓

Energy Consumption and Use:

- Energy Consumed: kWh
- Energy Generated (Solar): kWh
- Fuel Used: Diesel (maintenance vehicles): liters

ESAP COMPLIANCE See attached ESAP matrix. All items are on schedule. Summary:

- ESMS Implementation – Closed
- Emergency Preparedness Plan – On-time
- Waste Management Program – On-time
- Community Engagement Plan – On-going
- Sustainability Report Launch – On-time

8. Conclusion

Flash Motors Company Limited is committed to integrating environmental sustainability, social responsibility, and compliance into its daily operations. By adhering to this policy and regularly reporting on environmental and social compliance, we aim to contribute positively to our community, the environment, and the Jamaican economy.