



## **ENVIRONMENTAL SOCIAL AND NON-FINANCIAL GOVERNANCE POLICY**

The following are the key environmental, social, and non-financial governance policy issues that concern ATN Holdings (ATN) shareholders. These issues offer risks and opportunities to Investors seeking a thorough understanding of the company or industry. ATN considers each issue for its potential for financial impact. Investors more easily understand certain environmental, social, and non-financial governance policy risks and opportunities facing the Company.

### **LEGISLATIVE AND REGULATORY FACTORS**

ATN identifies and addresses the current and future legislative and regulatory risks of the markets where it operates and has communicated those matters to management and Investors.

- ATN communicates its strategy for addressing a current or future legal or regulatory environment to the Investor's satisfaction. This includes "scenario analysis" of possible regulatory and legislative outcomes and how the Company plans to adapt to each potential scenario.
- ATN reports on its environmental or social performance according to the guidelines of the Carbon Disclosure Project. ATN produces environmental reports according to the guidelines of the Carbon Disclosure Project.
- ATN adequately discloses its current and projected greenhouse gas emissions. ATN subsidiary ATN Solar Energy Group Inc. will operate an intensive carbon mitigating operation.

### **REPUTATIONAL FACTORS**

ATN views its reputation as a key strategic asset and manages it accordingly.

- ATN develops adequate plans for evaluating the risks its reputation may face. A Board-appointed committee is responsible for reviewing such risks and helping to develop plans for dealing with potential reputational risks.
- ATN identifies and adequately communicates to Shareowners the potential reputational risks inherent in its line of business.
- ATN has mechanisms in place, such as planning or training for executives to adequately deal with situations that may potentially harm the Company's reputation over the long term.
- ATN quickly and clearly communicates with key stakeholders, addressing issues that may affect reputation proactively rather than reactively so as to minimize risk.
- ATN has its environmental, social, and non-financial governance policy reporting audited by an outside independent expert. ATN's environmental and social reporting adds a level of credibility to the information contained in any such report.
- ATN adheres to professional industry code of conduct to enhance and affirm the Company's reputation, to better understand how the Company's adherence to the code affecting its reputation.



## **OPERATING FACTORS**

- ATN is committed to minimize impact of its environmentally sensitive rock crusher operations of subsidiary ATN Solar. Strategic analysis of environmental, social, and non-financial governance policy factors takes place at the management or Board levels.
- ATN has identified the potential operational risks inherent in its line of business and established a plan to contend with such risks.
- Company management and the Board of directors effectively communicate to all stakeholders their plan for mitigating these operating risks over both the near and long term.