

The Government of Sint Maarten



Princess Juliana
International Airport
Operating Company N.V.



Princess Juliana International Airport - Sint Maarten Reconstruction of the Terminal Building Project

Environmental and Social Commitment Plan (ESCP)

March 2019

The Government of Sint Maarten
Princess Juliana International Airport Operating Company N.V.
Reconstruction of the Terminal Building Project

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Sint Maarten is planning to implement the Reconstruction of the Terminal Building Project (the **Project**) with the involvement of Princess Juliana International Airport Operating Company N.V. (PJIAE). The World Bank has agreed to provide financing for the Project through Government of Netherlands Trust Fund.
2. The Government of Sint Maarten will implement material measures and actions so that the Project is implemented in accordance with the World Bank Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out a summary of the material measures and actions.
3. Where the ESCP refers to specific plans or other documents, whether they have already been prepared or are to be developed, the ESCP requires compliance with all provisions of such plans or other documents. In particular, the ESCP requires compliance with the provisions set out in the Environmental and Social Management Plan that has been] developed for the Project.
4. The table below summarizes the material measures and actions that are required as well as the timing of the material measures and actions. The Government of Sint Maarten (GoSM) is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1 above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the World Bank by the GoSM as required by the ESCP and the conditions of the legal agreement and the World Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the World Bank and the GoSM this ESCP may be revised from time to time during Project implementation to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the GoSM will agree to the changes with the World Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the World Bank and the GoSM. The GoSM will promptly disclose the updated ESCP. Depending on the project the ESCP may also specify the funding necessary for completion of a measure or action.
7. Where Project changes, unforeseen circumstances or Project performance result in changes to the risks and impacts during Project implementation, the GoSM shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include health and safety risks to the construction workers.

March 2019

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Reconstruction of the Terminal Building Project ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN March 2019				
<i>Summary of the Material Measures and Actions to Mitigate the Project's Potential Environmental and Social Risks and Impacts</i>		<i>Timeframe</i>	<i>Responsibility / Authority and Resources // Funding Committed</i>	<i>Date of Completion</i>
	<ul style="list-style-type: none"> Summary of stakeholder engagement activities (if any) and their outcome Summary of grievance log <p>3. Monitoring reports on the implementation of the ESCP, explaining the status of implementation of commitments made in this ESCP.</p>	<i>Six-monthly</i>	<i>PJIAE (Project Director of PMU).</i>	<i>Semester reporting through-out Project Implementation and until Project Completion date.</i>
B	<p>INCIDENTS AND ACCIDENTS NOTIFICATION:</p> <p>Promptly notify any incident or accident related or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the communities, the public or workers. Incident investigation reports for all major incidents covering details of the incident, root cause analysis, and actions taken to address the future recurrence of this event. These reports will be submitted to the World Bank and the Department of Labour.</p>	<i>Through Project Implementation. Request for prompt notification of incidents and accidents to be included in bidding documents for the Works as part of Contractor's ESMP (C-ESMP). Initial Investigation Report within 24 hours and Detailed Investigation Report within ten days.</i>	<i>Contractor and PJIAE. PJIAE will hire a specialist using resources from the Project to carry out root cause analysis for any severe incident, such as multiple fatalities. PJIAE.</i>	<i>C-ESMP) in place prior to commencement of the Works and valid throughout Project Implementation.</i>
SUMMARY ASSESSMENT				
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS				
1.1	<p>ORGANIZATIONAL STRUCTURE:</p> <p>Assign an Environmental and Social Specialist to the Project Management Unit to support the management of E&S risks. This specialist will be available throughout the Project implementation. Responsibilities of this specialist are given in Annex 1.</p>	<i>Before commencement of the Works. Services required for 18 months upon initiation of services.</i>	<i>PJIAE. USD 180,000 (@10,000/month for 18 months). Funding will be through the 'Project Management and Capacity Building (US\$ 0.5 million)' component of the Project.</i>	<i>Environmental and Social Specialist in place for 18 months upon initiation of services, subject to extension of contract depending on the implementation of the Works.</i>

Reconstruction of the Terminal Building Project
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN
March 2019

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1.2	MANAGEMENT TOOLS AND INSTRUMENTS: The ESMP will be implemented in compliance with the requirements of Environmental and Social Standards (ESSs) 1 to 10 and Environmental and the Employer's Environmental and Social Policy Statement (Annex 2).	<i>Quarterly monitoring reports on the ESMP implementation.</i>	PJIAE	<i>Quarterly reports submitted throughout implementation of TF funded activities.</i>
1.3	MANAGEMENT OF CONTRACTOR: The bidding documents will provide the requirements of the contractor to manage ESHS risks and impacts of the construction activities. These requirements are summarized in Annex 4 and include the following: <ol style="list-style-type: none"> The Main Works Contractor/Bidder shall propose an Environmental, Social, Health and Safety (ESHS) Specialist as the Contractor's Key Personnel at the Site. All Contractors/Bidders shall submit the Code of Conduct (CoC) that will apply to the Contractor's employees and subcontractors following the Employer's Environmental and Social Policy Statement (Annex 2). All Contractors shall be required to submit for approval and subsequently implement the Contractor's Environment and Social Management Plan (C-ESMP). 	<i>Continuously.</i> <i>Request to include CoC, ESHS Specialist and C-ESMP to be included in procurment document.</i> <i>Bidding document to request contractor to comply with these requirements during mobilization (within 30 days of signing the contract).</i>	Contractor	<i>C-ESMP in place prior to commencement of the Works.</i>
1.4	PERMIT, CONSENTS AND AUTHORIZATIONS: No permits are required for the Project Works. Contractor shall obtain a permit from the Ministry of Public Housing, Spatial Planning, Environment and Infrastructure (VROMI) for the disposal of waste at the government's operated landfill site.	<i>One month after signing of the Contract.</i>	Contractor	<i>Permit validity throughout the implementation of works and until completion of the Works' end date.</i>
1.5	THIRD PARTY MONITORING: The monitoring will be carried out by the contractors and PJIAE. The mold spore tests will be done by an environmental remediation consultant as the third party. No other third-party monitoring is proposed for the Project.	<i>The mold spore monitoring program is already in place.</i>	<i>PJIAE through environmental consulting firm (Farmer Environmental Group, LLC)</i>	<i>Mold spore monitoring program will be prior to commencement of the Project Works.</i>

Reconstruction of the Terminal Building Project ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN March 2019				
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ESS 2: LABOR AND WORKERS CONDITIONS				
2.1	LABOR MANAGEMENT PROCEDURES (LMPs): The Contractor will implement labor management procedures following the national labour regulations and ESS 2 for the hiring of project workers including contractor's workers. The procedures will include terms and conditions of employment including hours of work, wages, overtime, compensation and benefits, holidays, leaves, etc. The procedures will set out measures to prevent and address harassment, intimidation and/or exploitation.	<i>Procedures enforced throughout project implementation.</i> <i>Contractor's Works contract to incorporate procedures.</i>	Contractor, Department of Labour	<i>LMPs implemented throughout implementation of works and services and completion upon the works or services respective end dates.</i>
2.2	GRIEVANCE REDRESS MECHANISM (GRM): Contractor will establish a Grievance Redress Mechanism during the execution of the Works. For Stakeholders' GRM refer to the Stakeholder Engagement Plan (SEP), see Annex 7 .	<i>Throughout project implementation.</i> <i>Contractor's Works contract to incorporate GRM.</i>	Contractor	<i>Contractor's GRM in place before commencement of the Works and enforced throughout Project Implementation.</i>
2.3	OHS MEASURES: Implement occupational, health and safety (OHS) measures as described in the ESMP. In addition, the Contractors will develop (prior to the start of construction works) and implement a site-specific OHS management plan with Safety Audits carried monthly which should be conducted by the contractors (see Annex 5 for the details).	<i>Contractor's OHS requirement to be incorporated in the Works' contract as part of the bidding documents.</i> <i>Daily implementation of OHS measures.</i> <i>Monitoring of implementation of OHS measures and carry out safety audits monthly.</i>	PJIAE and Engineer. Contractors on daily basis, PJIAE and Engineer (PMU E&S Specialist, Engineer's site supervisors) on ad-hoc basis. Audits jointly carried out by Contractors, Engineer and PJIAE.	Contractor's OHS plan in place as part of their C-ESMP before commencement of the Works and enforced throughout Project Implementation.
2.4	EMERGENCY PREPAREDNESS AND RESPONSE: PJIEA will implement its Emergency Response Plan to respond to the natural and man-made disasters. The Plan is also applicable to the Project Works. Contractors will implement emergency response measures given in Annex 6 contained in C-ESMP, which are specific to the Project Works.	<i>PJIAE's Emergency Management Manual Plan is already in place. Requirement for Emergency Response Measures as part of C-ESMP</i>	PJIAE and Engineer Contractors, E&S Specialist of PJIAE and the Engineer.	<i>Enforced throughout Project Implementation.</i> <i>C-ESMP will be in place prior to construction of the Works.</i>

Reconstruction of the Terminal Building Project ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN March 2019				
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		<i>to be included in bidding document.</i> <i>Monthly safety audits to inspect the facilities.</i>		<i>Monthly safety audits conducted after initiation of the works.</i>
2.5	PROJECT WORKERS TRAINING: The Contractor shall provide training to all his workers, before they start working on site, on basic ESHS risks associated with the proposed construction works and the workers' responsibility. The training program shall be repeated every month. Contractor's site engineers will provide a weekly or ad-hoc (if and when required) toolbox talks and/or meetings with the construction workers on ESHS risks associated with the construction activities, which have been executed during the past week and for those which are foreseen to be carried out during the next week.	<i>Bidding document to include requirement of contractor to provide training as part of C-ESMP.</i> <i>C-ESMP to include weekly Toolbox meetings at the work sites.</i>	Contractors (no separate budget, included in the contractor's overheads and responsibilities).	C-ESMP in force before initiation of the works and enforced throughout Project Implementation.
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT				
3.1	MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS: Most of the waste from the construction activities will be refuse and excess construction material. For management of the waste the Contractor will (i) obtain the permit from VROMI for disposal of waste at the landfill site, (ii) reduce the generation of waste by using the principles of reduce, recycle and reuse, (iii) provide sufficient waste bins (separate bins for food waste, recyclables and garbage) at the worksite for the collection of waste generated from the worksites, and (iv) carry these wastes in the covered trucks for the safe disposal at the government's operated waste management facility. No hazardous waste is expected to be generated from the Project. If there is any hazardous waste the Contractor shall collect it separately and hand over to the government's waste management facility.	<i>Permits for waste disposal will be obtained before the start of construction works. C-ESMP to reflect management of waste and hazardous materials.</i> <i>Monitoring on the implementation of these measures on a daily basis.</i>	Contractors Contractors, PJIAE and its Engineer (PMU E&S Specialist, Engineer's site supervisors.	C-ESMP in place before initiation of the works and enforced throughout Project Implementation.

Reconstruction of the Terminal Building Project ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN March 2019				
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	Hazardous materials to be used in the construction are fuel and lubricants. The Contractor shall store all hazardous materials appropriately in bunded areas and should be covered to avoid direct exposure to rain, wind and sunlight; and take all precautionary measures when handling and storing fuels and lubricants, avoiding environmental pollution.			
ESS 4: COMMUNITY HEALTH AND SAFETY				
4.1	TRAFFIC AND ROAD SAFETY: Transport of material from the harbor to the airport will happen occasionally and during these days, the increased traffic use of the road by construction vehicles will affect the movement of normal road traffics and the safety of the road-users. For management of traffic and road safety, Contractors will develop and implement a site-specific traffic management plan (as part of the C-ESMP) with details on traffic volume, routes and time of travel. The plan will be shared with the local traffic authorities. The plan will be developed to ensure to avoid peak rush hours, traffic control by placing adequate flagmen and signs along the routes, trained drivers employed, and vehicle safety is regularly inspected.	<i>Site-specific traffic plan will be prepared by the Contractor (as part of C-ESMP) during mobilization.</i> <i>The plan will be implemented on the day of transport of materials.</i>	Contractor Contractor	<i>C-ESMP in place before initiation of the Works and enforced throughout Project Implementation.</i>
4.2	COMMUNITY HEALTH AND SAFETY: Community exposed to construction-related health and safety are airport staff and passengers. To manage community health and safety, the Contractor will (i) barricade the work areas with hard fencing to prevent entry of airport staff and passengers in the construction areas, (ii) place adequate signboards to divert staff and passengers away from the construction works, and (iii) also place flagmen to direct them away from the construction areas. All visitors to the work area should wear basic PPEs such as safety shoes, hard hats and vest.	<i>Request for bidders to include measures to be implemented throughout Project Implementation as part of the C-ESMP to be incorporated in procurement documents.</i>	Contractor Contractor	<i>C-ESMP in place before initiation on the Works and enforced throughout Project Implementation.</i>

March 2019

Summary of the Material Measures and Actions to Mitigate the Project's Potential Environmental and Social Risks and Impacts

Timeframe

**Responsibility /
Authority and
Resources //Funding Committed**

Date of Completion

Contractor's Code of Conduct shall cover a program to promote awareness to the construction workers on the risk of spreading of sexually transmitted diseases. Contractor's monthly training program will cover topics on the workers 'Code of Conduct'.

4.3	<p>GENDER-BASED VIOLENCE (GBV) AND SEXUAL EXPLOITATION AND ABUSE (SEA) RISKS:</p> <p>Contractor will develop and implement a Code of Conduct for all the construction workers with measures to prevent gender-based violence and sexual exploitation and abuse. All construction workers should abide by the Code of Conduct through contractual obligation.</p> <p>The Contractor's monthly training program will also cover topics related to Code of Conduct' such as sexual harassment particularly towards women and children; violence, including sexual and/or gender-based violence and respectful attitude, while interacting with the local community.</p>
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Request to include measures will be incorporated in bidding documents.

Contractor's C-ESMP will include a training plan on GBV and SEA Risks.

Training will be conducted on a monthly basis throughout the Project implementation.

Contractor
Contractor

C-ESMP in place before commencement of Works

4.4	GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION: Covered under 4.3.
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4.5	EMERGENCY RESPONSE MEASURES: Covered under 2.4.
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4.6	<p>SECURITY PERSONNEL:</p> <p>The construction works will be carried out inside a secured facility of the airport and no security personnel will be engaged by the Contractor for the safety of his worksites and workers.</p> <p>However, the Contractor will engage workers for safeguarding the material storage sites. These workers like others will sign the Code of Conduct and undergo regular training programs.</p>
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Request to incorporate measures will be included in bidding documents, as part of C-ESMP.

Regular training program throughout the project implementation.

Contractor

C-ESMP in place before commencement of the Works.

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4.7	UNIVERSAL ACCESS: Project will restore and/or replace Airport Terminal's facilities for the disabled to ensure universal access. These include restoration/replacement of ramps, elevators and toilets for the disabled.	<i>Restoration and/or replacement of existing ramps, elevators and toilets for the disabled are including in the bidding documents.</i>	Contractor	Project Completion date of the Works.
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT				
5.1	LAND ACQUISITION AND RESETTLEMENT: The project activities will be carried within the existing airport boundary and hence no land acquisition and resettlement will be required. Also, there were no legacy issues related to the original construction of the airport.	<i>Not applicable (N.A.)</i>		
5.2	RESETTLEMENT PLANS: No land acquisition and resettlement will be required for the Project.	N.A.		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES				
6.1	BIODIVERSITY RISKS AND IMPACTS: The project activities will be carried out within the existing airport boundary and hence will not affect any biodiversity.	N.A.		
ESS 7: INDIGENOUS PEOPLES/ HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES				
7.1	INDIGENOUS PEOPLES PRESENT OR COLLECTIVELY ATTACHED TO PROJECT AREA: No such communities present in Sint Maarten.	N.A.		
7.2	GRIEVANCE REDRESS MECHANISM: PJIAE has existing grievance redress mechanisms (GRM's) in place to receive concerns and grievances from the airport staff, from passengers, visitors, the public and from stakeholders as part of the Stakeholder Engagement Plan (SEP), see Annex 7 . The grievance mechanism will be communicated to all stakeholders and managed by PJIAE.	<i>GRM for SEP in place.</i>	E&S Specialist of PJIAE.	<i>GRM for SEP enforced throughout the implementation of the Project.</i>
ESS 8: CULTURAL HERITAGE				

Reconstruction of the Terminal Building Project ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN March 2019				
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8.1	CHANCE FINDS: While no cultural heritage (superficial or sub-surface) has been identified in the airport terminal area, the Works contract will include a standard chance finds clause with corresponding processes and procedures.	<i>Bidding document for Works to incorporate chance finds clause.</i>	<i>Contractor</i>	<i>Requirement enforced throughout implementation of the Works.</i>
8.2	CULTURAL HERITAGE: The project activities will be carried out within the existing airport terminal and hence will not affect any cultural heritage.	<i>N.A.</i>		
ESS 9: FINANCIAL INTERMEDIARIES				
9.1	ESMS: Establish and maintain an environmental and social management system (ESMS).	<i>N.A.</i>		
9.2	FI ORGANIZATIONAL CAPACITY: Not applicable to the Project.	<i>N.A.</i>		
9.3	SENIOR MANAGEMENT REPRESENTATIVE: Not applicable to the Project.	<i>N.A.</i>		
ESS 10: STAKEHOLDER ENGAGEMENT PLAN (SEP) AND INFORMATION DISCLOSURE				
10.1	STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION: SEP has been developed and is included in Annex 7 .			
10.2	SEP IMPLEMENTATION: PJIAE 'Communication Officer' tasked to implement the SEP with resources and implementation task as described in Annex 7 .	<i>SEP to be discussed with contractor before commencement of works.</i>	<i>PJIAE Communication Officer</i>	<i>SEP already in place, throughout Project implementation.</i>
10.3	GRIEVANCE REDRESS MECHANISM: PJIAE has an existing grievance redress mechanism (GRM) in place to receive concerns and grievances from the staff, passengers and other stakeholders as and part of the SEP (see Annex 7).	<i>GRM for SEP in place</i>	<i>PJIAE E&S Specialist</i>	<i>GRM for SEP enforced throughout Project Implementation.</i>

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Capacity Support			
Specify Training to be provided	Specify Targeted Groups and Timeframe for Delivery	Specify Training Completed	
<ul style="list-style-type: none"> Environmental and social risks and impacts of the Project and ESMP implementation. Strengthen awareness on the environmental, social, health and safety issues associated with the construction works including HIV/AIDS, sexual exploitation and abuse, and gender-based violence. 	<i>PJAIE's key technical and project workers involved in the implementation of the Project, including the airport staff and security and business in the airport premises.</i> <i>Training will be started during the initial stages of construction and will be repeated every six months.</i>		
<ul style="list-style-type: none"> Environmental and Social issues associated with the ongoing construction works. Workers health and safety. 	<i>Site Engineers of the Contractor, PMU and the Project Management Consultant.</i> <i>Training will be conducted on a monthly basis.</i>		

Annex 1: Role and Responsibilities of the Environmental and Social Specialist of PJIAE

The Responsibilities of the PJIAE's Environmental and Social Specialist will include:

- Work under the guidance of the Director of PJIAE to manage the environmental and social risks of the Project.
- Assist the PJIAE in drafting the Environmental, Social, Health and Safety requirements in the bidding and contract documents following the ESMP and integrating the ESMP into contract documents.
- Assist the PJIAE in review and approval of the various documents prepared by the contractor such as C-ESMP, Code of Conduct, labor procedures, job hazard analysis, monitoring reports, and so on.
- Supervise the contractor's work to ensure compliance with the environmental, social, health and safety requirements of the bidding documents and ESMP. Provide recommendations for the implementation of corrective actions for any non-compliances and suggest improvements for the contractor's performance.
- Investigate and report all incidents related to environmental, social and health aspects. Carry out root cause analysis for all major incidents, and recommended actions to be taken to rectify the failure that led to these incidents.
- Provide regular training programs to the contractor's labor on environmental, social, health and safety aspects associated with the construction activities.
- Carry out regular consultations with the stakeholders following the Stakeholder Engagement Plan (SEP).
- Assist the PJIAE in implementing its Environmental Social Commitment Plan (ESCP).
- Prepare quarterly progress reports on the implementation of the ESMP and semester progress reports of ESCP for transmission to the World Bank throughout the project implementation period.

Annex 2: Environmental and Social Policy Statement

The intent of the Environmental, Health and Safety (EHS) policy statement is to reinforce the commitment by Prince Juliana International Airport Authority to the EHS principles.

The requirements of this policy apply to PJIAE employees, entities, contractors and joint ventures under PJIAE operational control.

PJIAE commitments include the following:

- Every employee and contractor working on behalf of PJIAE or working under a contract signed with PJIAE is expected to share PJIAE's commitment to pursue the goal of not harming people. The following elements will be integrated into the planning process of the parties involved in the execution of the works:
 - Environmental protection, occupational and community health and safety, gender equality, child protection and considerations for vulnerable people (including those with disabilities).
 - There will be a provision made against sexual harassment, gender-based violence (GBV), sexual exploitation and abuse (SEA) and including HIV/AIDS awareness and prevention.
 - And broad based, culturally appropriate stakeholder engagement on project activities, thereby earning the confidence of beneficiaries of PJIAE activities, and society at large, being a good neighbor and contributing to sustainable development of Saint Maarten.
- For the purpose of the Policy and/or Code of Conduct, the term "child" / "children" means any person(s) under the age of 18 years. PJIAE's Code of Conduct is included in **Annex 3**.
- PJIAE's policy is to comply with all health, safety, security and environmental laws, rules and regulations, not just because it is legally required, but also because PJIAE believes it is the responsible way to conduct its business and to promote greater environmental responsibility, at a minimum:
 - i. Apply good international industry practice to protect and conserve the natural environment and to minimize unavoidable impacts;
 - ii. Provide and maintain a healthy and safe work environment and safe systems of work;
 - iii. Protect the health and safety of local communities and users, with particular concern for those who are disabled, elderly, or otherwise vulnerable;
 - iv. Ensure that terms of employment and working conditions of all workers engaged in the Works meet the requirements of the ILO labor conventions to which the host country is a signatory;
 - v. Be intolerant of, and enforce disciplinary measures for illegal activities. To be intolerant of, and enforce disciplinary measures for GBV, inhumane treatment, sexual activity with children, and sexual harassment;
 - vi. Incorporate a gender perspective and provide an enabling environment where women and men have equal opportunity to participate in, and benefit from, planning and development of the Works;
 - vii. Work co-operatively, including with end users of the Works, relevant authorities, contractors and local communities;
 - viii. Engage with and listen to affected persons and organizations and be responsive to their concerns, with special regard for vulnerable, disabled, and elderly people;
 - ix. Provide an environment that fosters the exchange of information, views, and ideas that is free of any fear of retaliation, and protects whistleblowers;
 - x. Minimize the risk of HIV transmission and to mitigate the effects of HIV/AIDS associated with the execution of the Works;

- PJIAE has a systematic approach to health, safety, security and environmental management designed to ensure compliance with the law through the implementation and use of environmental and safety management systems through its contractors.
- PJIAE trains its employees and requires its contractors to be aware of and meet their responsibility for protection of health, safety and the environment, and to achieve continuous performance improvement.
- PJIAE actively identifies and manages risks to prevent or reduce possible adverse consequences from its activities.
- PJIAE assesses and manages exposure of employees and contractors to EHS hazards in its operations.
- PJIAE monitors the entity's and its contractors' environmental performance and undertakes a precautionary approach to environmental challenges.
- PJIAE regularly reports on environmental issues on <https://www.sxmairport.com>
- Employees, supervisors, operational managers or contractors who knowingly engage in or condone environmental health or safety violations are subject to disciplinary action including suspension or termination.
- PJIAE will continue to engage its leadership and resources to effectively and efficiently implement and execute the commitments above.

Michel Hyman
COO
PJIAE N.V.

Annex 3: PJIAE's Code of Conduct



Princess Juliana
International Airport
Operating Company N.V.

Do The Right Thing Right

Page 1 of 27

(last updated September 21, 2018)

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Princess Juliana
International Airport
Operating Company N.V.

PJIAE

Code of Conduct

Document Name	PJIAE Code of Conduct
Version Number	1.0
Superseded Document	N/A – First edition
Effective Date	November 01, 2018
Approval Date	September 28, 2018
Author(s)	drs. Shirley Pantophlet-Gregoria (Compliance Officer)
Owner(s)	All Staff
Approver(s)	Managing Board (MB) Supervisory Board of Directors (SBOD)
Document Repository	TBD
Supporting Documentation	

This table records any changes made to this document and approvals of the changes:

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Princess Juliana
International Airport
Operating Company N.V.

Version Date	Version Number	Nature of Revision	Section/Page(s) Revised	Revised by Name and Title	Approved by Name and Title
					Ravi Daryanani CTO / ATIS COO
					[Signature] COO



Our Mission

To be the regional leader in providing safe, secure, quality and profitable airport services that contribute to the general economic and tourism development of St. Maarten/St. Martin and the region we serve.

Our Vision

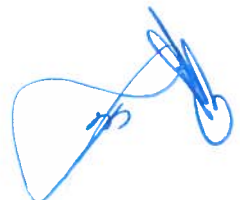
En route to new horizons

The PJIAE Values

- P** People : People are developed, and their contributions are valued and respected. Excellence in service and performance are expected and rewarded.
- J** Judicious : All actions are guided by prudence and application of sound judgment based on cooperation and trust.
- I** Innovation : Work is carried out in an environment where new ideas are promoted, encouraged, and implemented with enthusiasm
- A** Acceleration : We maximize the velocity of people's growth and readiness for the future.
- E** Ethics : All actions are guided by righteousness, integrity, and fairness and are based on established responsibilities and accountability.

The PJIAE Guiding Principles

- 1. Safety and Security Highest practical standards of Safety and Security
- 2. Labor relations Fair pay and conditions. Working relationship that will lead to higher productivity and higher service standards for airport customers and users.
- 3. Quality Customer Service The highest levels of customer facilities and services to maintain the airport's competitive position and encourage customer loyalty.
- 4. Developed Air Service Network Premier gateway to/from St. Maarten and surrounding islands. Its hub-function the best network of connections in the region. Strong relationships with stakeholders
- 5. Community Relations Good relationship with stakeholders. Operation in harmony with the community in general.
- 6. Partners in business Partnering and engaging in dialogue with all companies operating at the airport to realize higher productivity and higher standards of service for airport customers and users.
- 7. Flexible Organization Enhance capabilities and or response to challenges in PJIAE's operating environment within a framework built on best business practices.
- 8. Environmental awareness PJIAE will act environmentally responsible and seeks to ensure equilibrium between its ecological and business environment.
- 9. Corporate Governance and Regulatory Compliance PJIAE encourages best business practices with emphasis on absolute compliance with existing laws and regulations. PJIAE aims at internalizing best business and government practices.





Princess Juliana
International Airport
Operating Company N.V.

10. Sound Financial and
Commercial
stewardship

Sound financial and commercial stewardship aimed at the effective
and economic use of airport properties and assets.¹

The PJIAE Motto

PJIAE = Employees

¹ The outlined guiding principles are intended to be applied as a set and not individually, to ensure balanced and effective decision making aimed at realizing the objectives of PJIAE

A handwritten signature in blue ink, consisting of a large, stylized 'P' followed by a series of loops and a final vertical stroke.



Princess Juliana
International Airport
Operating Company N.V.

A Message from our C.F.O./acting C.E.O

The success of a business depends on many factors. Naturally there are the products and services, the pricing policy and the timing and quality of delivery. Without these, there is no business. However, what distinguishes a successful and sustainable business from short-lived ventures is the discipline of all its employees, management and staff to live by certain business principles. As a principles and values-based company, PJIAE expects all staff to behave in a responsible and principled way. Compliance is embedded in our PJIAE culture and supports our mission to serve the region, airlines, passengers and other stakeholders. It's critical that as PJIAE employees we know, understand and unwaveringly follow the policies that are fundamental to the proper practice of our business. There are no shortcuts in compliance. This code of conduct will help you understand what PJIAE expects of you and what our customers and stakeholders expect of us. It's not an exhaustive list of every policy you may need to know in your particular role, but it's a good roadmap and, if you have further questions, it directs you to additional resources. Our social architecture – the PJIAE Values, our Vision, Mission and Guiding Principles – and this Code of Conduct provide the best guidance for our decisions and actions.

Please read this Code of Conduct carefully. Each one of us is responsible for observing this code. It will help you arrive at a heightened appreciation of the value of ethical conduct and full compliance. It ensures our compliance with the applicable laws as well as ensure our achievement of the highest standards of corporate responsibility and our determination to integrate our ten guiding principles into our everyday work. Doing the right thing right (for the right reasons) is the only way to earn and keep the confidence and trust of our partners (airlines, concessionaires), the passengers, our customers, the public and the region we serve.



Ravi Darvyanani
C.F.O./acting C.E.O.
PJIAE N.V.



Princess Juliana
International Airport
Operating Company N.V.

Declaration of acceptance of PJIAE Code of Conduct.

GENERAL PRINCIPLES

This code is complementary to PJIAE policies. Responsibility for managing the PJIAE Code of Conduct rests with the Compliance Department. To ensure it is understood by employees and third parties this Code is also available on the PJIAE web-site

Please read it carefully and make sure you fully understand it, then sign the attached slip and send it back to the HR department.

IF YOU ARE CONCERNED THAT YOU DO NOT FULLY UNDERSTAND ANY PART OF THIS CODE:

- Read the respective policies as they apply for your department
- if there isn't a related policy, or if you have read the policy and still have questions, consult your Supervisor/manager/director or send an e-mail stating your question to the compliance email:
compliance@sxmairport.com

A handwritten signature in blue ink, consisting of a series of loops and a final flourish.



Princess Juliana
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Operating Company N.V.

DECLARATION OF ACCEPTANCE OF PJIAE CODE OF CONDUCT

This is to acknowledge that I have received our PJIAE's Code of Conduct.

I hereby declare that I have read/ reviewed the PJIAE Code of Conduct and that I fully understand the mission, vision, values and guiding principles of behavior that PJIAE embodies

I understand that compliance with the PJIAE Code of Conduct is mandatory for every PJIAE employee. I agree to comply with the standards contained in the code and all related policies and procedures as is expected as part of my continued employment or association with PJIAE.

I also believe that by complying with the PJIAE Code of Conduct, we all contribute towards improving the working environment and become better professionals as well as better individuals. I understand that we are expected to promote these principles wherever possible.

I acknowledge that the code is only a statement of principles for individual and business conduct and does not constitute an employment contract.

I will report any potential violation of which I become aware of promptly to my supervisor/ manager /director or the compliance officer.

I understand that any violation of the code of conduct or any organization policy or procedure is grounds for disciplinary action, up to and including discharge from employment.

I confirm that I comply with these standards and that I have disclosed any actual or potential conflict of interest. In addition, I understand that the PJIAE Code of Conduct is published on the PJIAE website and I can consult it whenever I have a question or concern.

PLEASE SIGN AND RETURN TO THE HUMAN RESOURCES DEPARTMENT

Name: _____

Department _____

Division _____

Place and date _____

Signature

Holder of Code of Conduct



Table of Contents

1. Understanding Our Code.....	11
Introduction	11
Scope.....	11
Your Responsibilities.....	11
Additional Responsibilities of supervisors/managers/director	12
Disciplinary action.....	13
2. Asking Questions and Getting Help.....	13
Resources for Getting Answers	13
Making Ethical Decisions.....	14
3. Reporting Concerns.....	14
Reporting a Possible Violation	15
Calling the SXM Airport Business Conduct Line	15
Anonymity and Confidentiality	16
Our Non-Retaliation Policy	16
4. International and local inspections and requests.....	16
St. Maarten Civil Aviation Authority Inspections and other International Aviation Agencies Requests.....	17
Respecting the Environment	17
5. Our Relationships with Airlines, Concessionaires, Suppliers and others	18
PJIAE Business Conduct.	18
Anti-corruption.....	18
Conflict of Interest.....	18
6. Our staff and our workplace	19
Our Work Environment	19
Protection of personal information.....	21
Use of company systems.....	22
7. Our stakeholders	22





Princess Juliana
International Airport
Operating Company N.V.

Conflicts of interest	22
Financial integrity	23
Business Records and Information	23
Safeguarding PJIAE's Information	24
8. Additional Information about compliance at PJIAE	25
PJIAE's Compliance Program	25
Index	26

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1. Understanding Our Code

Introduction

When all is said and done, all of us want to be proud of the work we do at PJIAE, knowing that we have done our part to provide safe, secure, quality and profitable airport services, contributed to the general economic and tourism development of St. Maarten/St. Martin and the region we serve and earned and maintained our reputation for high ethical standards. But in today's complex, global business world, no company can assume that the right course of action is always clear, nor can it take for granted the continued goodwill of others. Even companies with great reputations must invest in protecting that reputation. To help us at PJIAE Do the Right Thing Right, we have designed this Code of Conduct. Doing the right thing right is not always easy. Ethical behavior goes beyond compliance with the laws. One of the attributes that sets PJIAE apart is that we do the right things (right), in the right ways and for the right reasons. At times, we might sacrifice some immediate advantage, but in the long run, when we adhere to high ethical standards, we benefit our passengers, our partners (airlines and concessionaires), our fellow employees and our (other) stakeholders.

Please read this Code of Conduct carefully and keep it handy for your reference. This Code of Conduct answers some of the important questions about our conduct; the PJIAE Values and Guiding Principles and your own good judgment answer the rest.²

Scope

Every person conducting business for PJIAE must follow this Code of Conduct, together with all applicable laws and PJIAE policies and Guiding Principles. This includes all staff and levels of management, thus every PJIAE employee whatever position he holds and whatever form of contract he is under (e.g. employee, supervisor, manager, officer, director, board member as well as consultants, contract workers, temporary workers, school-job-trainees and interns).

Your Responsibilities

One of your responsibilities is to follow the law and PJIAE policies and procedures as you conduct business on behalf of PJIAE. While this Code of Conduct has been written to familiarize you with many of the policies that apply at PJIAE, it does not supersede them or act as a substitute for reading each policy that applies to your specific job. We all need to understand the policies that apply to our work and our roles. Check with your function and your supervisor/manager/director to learn about job-specific information that you need to know.

Remember, no written policy or code on its own can guarantee compliance with the law or ethical decision-making. Each of us must do our part. Here are just a few ways you can Do The Right Thing Right.

- **Act with honesty and integrity**

² If an employee is concerned that any point in this Code conflicts with the laws he should consult the Compliance department.





Conduct business with honesty, integrity, fairness and in a manner, that protects PJIAE's public image and reputation. (Integrate PJIAE's core values in your daily behavior and strictly apply the guidelines stated in this code.

- **Follow the rules**
Follow the law and PJIAE policies and procedures as you conduct company business.
- **Respect others**
Respect hierarchical instructions. Respect fellow employees/colleagues, management, government officials, our business partners and others.
- **Ask**
If you are unsure about what to do or have questions about law, policy, ethics or other compliance issues, ask your supervisor/manager/director or consult the resources identified by this Code.
- **Excel in your performance**
Perform your tasks to the best of your abilities and take every opportunity to enhance your skills and share your knowledge. Constantly set a good example in your general behavior.
- **Teamwork**
Contribute towards ensuring an efficient and stimulating teamwork atmosphere
- **Report violations**
Remain vigilant in respect of the application of the code of Conduct. Promptly report all known or suspected violations of law, this Code or PJIAE policies through the appropriate channels. If someone asks you or pressures you to do something that might be a violation, report that also.
- **Cooperate with investigations**
Fully cooperate with PJIAE investigations into potential violations. This includes being forthcoming and telling the truth. Ensure the confidentiality of information when requested.

Additional Responsibilities of supervisors/managers/directors

If you are a supervisor/manager/director, you have additional responsibilities. You must take steps to promote compliance and prevent violations in the areas you supervise/manage/direct. Lead by example. You must serve as a positive role model and should encourage others to follow this Code and PJIAE policies. What you do encourages others to do the same thing. Here are some specific ways you, as a supervisor/manager/director, can fulfill these obligations.

- **Foster a culture of compliance and ethics through personal leadership**
 - Demonstrate the highest ethical standards (honesty, integrity, fairness and responsibility) and quality in your work every day and expect the same from the people who report to you.
 - Never give others the impression that it is acceptable to ignore our policies or skip steps. Do not create or tolerate an environment where employees feel pressured to bend rules.
- **Guide employees, consultants, trainees, school-job-trainees and temporary employees**
 - Ensure that your direct reports complete all corporate and job-specific compliance training. (Including the mandatory safety training every two years.) On a regular basis, review with your direct reports the policies that apply to them.





- Make sure suppliers, consultants, trainees, school-job-trainees and temporary staff working in your area act in a manner consistent with this Code and policies that apply to them.
- **Prevent and report problems**
 - Be proactive and take steps to prevent problems before they happen; do not condone them when they do.
 - Respond to employees who raise concerns in a way that makes them feel secure and at ease when/while sharing their issues.
 - Be responsible for reporting violations you suspect or that others (not just your direct reports) share with you.

Disciplinary action

Failure to comply with the Code, PJIAE policies or applicable law will subject employees to disciplinary action up to and including termination of employment, to the extent permitted by law. Disciplinary action may also be taken when supervisor/manager/directors ignore misconduct or fail to correct it. In addition, PJIAE may terminate the services or work engagement of non-employees who fail to comply with the Code, our policies, and applicable law.

2. Asking Questions and Getting Help

PJIAE's values are people (= respect), judicious (=prudence, sound judgment), innovation, acceleration (=maximize people's growth) and ethics. All actions are guided by honesty, integrity and fairness. Cooperation, trust and shared objectives, thus teamwork, are vital to success. High standards for service and performance are expected and rewarded. Open and candid dialogue is therefore also encouraged at PJIAE. When in doubt, ask a question or raise an issue.

Resources for Getting Answers

Part of being able to Do The Right Thing Right is seeking help when you need it. If policies and procedures do not provide enough direction, ask your supervisor/manager or director for clarification. There are many resources available to help you when you have a question or need additional guidance about the topics discussed in this Code of Conduct or about compliance in general. These include:

Resource	Number to Call
Your supervisor	Refer to PJIAE's Telephone Directory
Your manager	Refer to PJIAE's Telephone Directory
Your director	Refer to PJIAE's Telephone Directory





Princess Juliana
International Airport
Operating Company N.V.

Your Human Resources Advisors	7506 PJIAE, or 1-721-546-7506 outside of PJIAE,
The PJIAE Legal Counsel	7505 PJIAE, or 1-721-546-7505/ 1-721-520-7429 outside of PJIAE
The Compliance Officer	7567 PJIAE, or 1-721-546-7567 outside of PJIAE
The SXM Airport Business Conduct line	You may ask questions or request guidance via email: compliance@sxmairport.com

Making Ethical Decisions

No code of conduct can cover every situation. When you face ethical issues, which are difficult to resolve, ask yourself these questions to help you Do The Right Thing Right:

- Is it legal and ethical?
- Is it consistent with PJIAE's Code of Conduct and PJIAE policies?
- Is it consistent with the PJIAE Values and Guiding Principles?
- What feels wrong about this situation or action?
- How could my decision affect our stakeholders?
- How will I feel about myself later if I do it?
- How could my decision affect my reputation and that of PJIAE?
- Would I be comfortable explaining it to my family and friends?
- Would I be comfortable if it appeared on television, in a newspaper or in the social media?

If you are still uncertain about the ethics or legality of an issue, seek additional guidance before proceeding. Keep asking questions until you are certain that you will **Do The Right Thing Right**. (And for the right reasons)

3. Reporting Concerns

We all have a responsibility to protect PJIAE from unethical behavior and policy violations. It's important to tell someone if you know of a problem or suspect something is wrong. At PJIAE, we value ethics, respect, cooperation and trust. The earlier potential issues are raised, the sooner they may be resolved. If you do not feel comfortable about something you are asked to do, or witness something that seems irregular, first check that your information is accurate.





Reporting a Possible Violation

You play an important role in helping us meet our high standards for compliance. When you raise issues or report concerns, we can consider the matter, take timely and appropriate action, and make corrections, if required. The Audit Committee of the Supervisory Board of Directors is responsible for overseeing the accounting and financial reporting processes at PJIAE. The Audit Committee of the SBOD is also responsible for overseeing corporate responsibility and compliance. To support these responsibilities, PJIAE has established procedures for reporting and handling financial and other compliance complaints. Financial complaints may relate to questionable accounting or auditing matters including noncompliance with internal accounting controls or dishonest statements involving a supervisor, manager, director or accountant. Other compliance complaints include good faith concerns about conduct that is inconsistent with the PJIAE Values and Guiding Principles or that violates a law or regulation or PJIAE policies and procedures.

Q: What matters should be reported?

A: You can report good faith concerns about financial irregularities and other compliance issues or misconduct, such as violations of applicable law, regulation, or PJIAE policy.

Compliance email or drop box

You can email: compliance@sxmairport.com Or drop your concerns off in the compliance drop boxes at the different locations.

Do The Right Thing Right

- Promptly raise concerns about any suspected misconduct.
- Drop your concerns in one of the compliance drop boxes if you suspect a violation of the Code of Conduct, a PJIAE policy or applicable law. Employees can also contact a Human Resources officer or the Compliance officer. (Contact information is provided in Section 2 of this Code.)
- If the issue is sensitive get advice/assistance from HR department or your supervisor/manager/director.
- If the matter is very sensitive – send an email to compliance@sxmairport.com
- Sending an email anonymously is not forbidden but it is not recommended as it makes investigation more difficult.

Drop boxes

The drop boxes are placed at the different location where PJIAE has its offices at present. The drop boxes will be emptied daily.

Each concern will be registered and given a reference number and a follow up date. The reference number will be shared with you once you contact us for it. Though not required, you are encouraged to provide your contact information in case additional information is needed. Please note that failure to provide all the information you have may prevent us from conducting a thorough investigation.

PJIAE takes all concerns dropped in the boxes seriously and handles them on a case-by-case basis. Investigations are handled in a manner that, in our view, is as confidential as possible under the



circumstances. PJIAE will attempt to determine whether misconduct has occurred and will take the action it decides is appropriate.

You can contact us via email at any time during the process to receive follow-up information or final feedback, using the reference number you were originally given when you reported your concern. Please be aware that we may be limited in the information that can be shared. Note that investigations may take some time. Don't assume nothing is happening just because it takes a while to close a matter.

Anonymity and Confidentiality

You can also make your concerns known anonymously. However, at times we might discourage or prohibit anonymous reporting or restrict the scope of what may be reported through the Compliance drop boxes, such as only allowing reports of accounting or financial irregularities. The specific reporting restrictions will be described to you when they come online.

All information you submit will be treated in as confidential a manner as we determine is possible under the circumstances. This means the information you report will be shared only with those who need to know to answer your question or look into the matter. However, in some cases, PJIAE may be required by law to reveal your identity. In addition, it may not always be possible to keep your identity confidential if, for example, you are one of a small number of people who know certain facts, or you work in a very small department where it may be obvious from the details who originated the complaint.

Our Non-Retaliation Policy

PJIAE will not tolerate any retaliation. Our policy prohibits intimidation or retaliation against employees who report a compliance concern in good faith or participate in good faith in any investigation or other proceeding. Our Non-Retaliation policy applies to reports made through the compliance drop boxes, via any of the other resources identified in this Code of Conduct, or in any other appropriate manner.

Extra Focus:

- Reporting a violation is mandatory
- Retaliation is forbidden and will lead to disciplinary action
- False allegations will result in disciplinary action and, in serious cases, could lead to individual legal liability

Important Note:

PJIAE is committed to the highest standards of ethics and compliance, transparency and investigation of complaints. However, should you feel your complaint was not dealt with timely, effectively or satisfactorily, please note that you always have the right to seek further assistance from the Ombudsman or independent legal assistance.

4. International and local inspections and requests

Our business operates in a highly regulated environment. Maintaining ethical, respectful and cooperative relationships with government agencies (local and international), policy makers and other public





officials is critical to our ability to deliver safe, secure, quality and profitable airport services.

St. Maarten Civil Aviation Authority Inspections and other International Aviation Agencies Requests

The airport business is regulated locally and globally by agencies (St. M CAA, FAA and ICAO e.g.). Therefore, we expect that our facilities and activities will be inspected from time to time. PJIAE has a long history of working in cooperation with governments and regulatory bodies around the world, and we welcome government and international aviation agencies inspectors as our partners in ensuring safety, security and quality.

Do the Right Thing Right

- Provide a positive and cooperative environment for inspectors throughout the inspection process.
- Never make false or misleading statements to any government/regulatory official.
- Be familiar with your department's procedures for complying with a request for access to PJIAE's premises or responding to an inquiry, information request, or other legal document.

Q: What should I do when I can't answer a government inspector's question during an interview?

A: If you do not know the answer, say so and tell the inspector you will get the answer promptly (from your supervisor, manager or director). Do not guess or make up a response. Also, do not present information in a misleading way or omit critical information.

Respecting the Environment

PJIAE is committed to operating in an environmentally responsible manner. We will comply with all applicable laws and regulatory requirements relating to environmental, health and safety and security matters.

Consistent with our obligations under applicable law, PJIAE seeks to ensure equilibrium between its ecological and business environment. PJIAE will take the appropriate steps to monitor environmental issues and concerns and encourage environmentally friendly initiatives.

Do The Right Thing

- Be sure that your work activity is environmentally sound. Participate in PJIAE programs targeting conservation of energy and resources, waste reduction and recycling if any.
- Promptly report all environmental incidents, including potentially harmful releases into the atmosphere, land or water.
- Cooperate fully with any investigation by PJIAE into an environmental incident and with any subsequent corrective actions.
- Participate in PJIAE-provided training.



Q: I observe someone smoking on airside and I know that this is not allowed. What should I do

A: Approach the individual and inform him that this is not allowed and to cease smoking immediately. Inform the Operations Department of this.

5. Our Relationships with Airlines, Concessionaires, Suppliers and others

PJIAE Business Conduct.

All PJIAE Business is guided by honesty, integrity and fairness and at PJIAE we focus on ways to ensure that our businesses partners compete based on equality, quality, price and service. PJIAE will not tolerate or participate in any business conduct, transaction or activity that violates these principles.

Do The Right Thing Right

- Do not engage in discussions or make agreements with any actual or potential partner about pricing policies, discounts, or other terms of sale that conflict with PJIAE values and guiding principles.
- Do not engage in discussions or make agreements with any actual or potential competitor/partner about the sale (or non-sale) of either our services/products or theirs.
- Never accept bribe or attempted bribes from customers or suppliers to help their business (or hurt their competitors).
- Exercise caution when you engage in conduct that could give the appearance of unfair competition or the abuse of your position as Airport Authority.

Conflict of Interest: see our conflict of interest policy

Anti-corruption: see our anti-corruption policy

Q: I work in the IT department. One of our customers asked if I could work with him on weekends to help set up a new accounting system.

Since this project is different from the work I do for the customer through PJIAE, may I take on the contract work?

A: No. This situation represents a conflict of interest. To avoid the perception that you might offer preferential treatment to this customer, you must decline the arrangement. Refer the customer to the conflict of interest section of our code and/or our conflict of interest policy.

Do the Right Thing Right





- Do not make, offer, or promise any payment, gift, service, or anything of value (directly or indirectly) that is intended to improperly influence the actions of government personnel or private individuals to advance PJIAE's commercial interests.
- Do not provide anything of value, including grants, donations, or gifts, to encourage the recipient, either from the government or private sector, to advance PJIAE's commercial interests. Review the additional PJIAE policies that address this subject in specific contexts as well as PJIAE conflict of interest policy.
- Be aware that customs in one country, including gift giving, may not be lawful or appropriate elsewhere.

6. Our staff and our workplace

The PJIAE Values are most evident in our work environment. As PJIAE employees, we take pride in living the company's values in everything we do, and we seek to foster an environment of teamwork cooperation, mutual trust and respect.

Important Note — It may seem that one person's choices and actions will have little impact on a large company like PJIAE. This is not true. Everything you do helps to build and sustain an environment that embraces the PJIAE Values.

Our Work Environment

All employees must follow all applicable laws and observe the highest standards of professional behavior, exhibit integrity always, treat others with respect and comply with company policies (including the PJIAE dress-code).

You are responsible for maintaining the company's good reputation. Never engage in any conduct or activity that could raise questions about PJIAE's honesty or integrity, or that might cause embarrassment to the company. Ultimately, others judge PJIAE by whether you live the PJIAE Values.

Do the Right Thing Right

- Follow all PJIAE policies, including those discussed in the Code of Conduct, and live the PJIAE Values and Guiding Principles.
- Be honest in your words and actions. Never act in a way that could discredit PJIAE, or could be offensive to customers, regulatory agencies employees, colleagues or others.
- Act professionally and always adhere to accepted industry or professional standards that apply to you.
- Take the right steps to safeguard PJIAE property.

Q: I understand we are working in a continuous changing business environment. Will the PJIAE Values, the Code of Conduct and our policies still apply in these new business settings?

A: Yes. The PJIAE Values are enduring. Similarly, the Code of Conduct describes policies that apply to all of us in every environment and under all circumstances in which we do business. Our business may



change, our markets may change, but the PJIAE Values and the Code of Conduct will continue to guide us. The Code of Conduct is a living document and will be updated periodically. Our website will have the latest version.

Extra Focus — Be aware that e-mails, posters, calendars, screen savers, photographs, cartoons, etc., which are inappropriate and offensive to others may be considered harassment. Making derogatory references concerning personal characteristics, such as gender, race, or religion, as well as inappropriate touching and personal threats, could also be harassment.

Non-discrimination and a Harassment-Free Workplace

At PJIAE we believe PJIAE = employees. PJIAE is committed to fostering a workforce with good labor conditions whereby people are valued and appreciated for their contributions and new ideas are encouraged and implemented with enthusiasm. Such a workforce strengthens PJIAE and will lead to higher productivity and higher service standards for airport customers and users.

Behavior that amounts to unlawful discrimination or harassment (including sexual harassment) violates PJIAE's policies and the PJIAE Values. This behavior undermines our ability to work together in teams, and it is contrary to our belief in the importance of respecting each other.

Do the Right Thing Right

- Never engage in any unlawful discrimination.
- Discourage and report comments, jokes or epithets that are inappropriate, offensive or derogatory to others.
- Never seek sexual favors in return for employment rewards.
- Never take part in conduct that is hostile or threatening nor encourage others to do so.
- Know how to find and use telephone numbers that are appropriate for reporting specific issues.

Q: What is unlawful discrimination?

A: Generally, these laws prohibit discrimination in employment based on the inappropriate use of personal characteristics, such as race, color, national origin, gender, religion, age, sexual orientation, ancestry and disability. Learn what policies apply in St. Maarten.

Safety and security at PJIAE

Safety and security is a priority in everything we do. You have an obligation to your fellow colleagues and to those who pass through our airport to be sure work conditions in your area meet our safety requirements. You can do this, for example, by participating in (the mandatory) safety and security workshops every two years, participating in the fire and or evacuation drills, following safety standards, and promptly reporting safety concerns.

We are committed to a workplace without substance or alcohol abuse. You may not be on the airport premises, in company vehicles, perform work for PJIAE if you are impaired by drugs or alcohol. We encourage you to seek treatment for any substance-related problems.

PJIAE is committed to a workplace free of violence.

You should immediately report offensive, threatening or violent behavior, whether verbal or physical. Violent or threatening acts are not permitted and will not be tolerated.

Do the Right Thing Right





Princess Juliana
International Airport
Operating Company N.V.

- Act in a reasonably safe manner
- Be responsible for any visitor you bring at the airport
- Know the health and safety rules for your department including emergency response plans
- Promptly report unsafe or unsecure situations and events
- Participate in PJIAE-provided trainings for your function and attend the mandatory safety training
- Display/wear your Airport Security Pass on your most outer garment always as per the security specifications

Important note – if on occasion, alcohol may be provided or be available at some work-related or company sponsored events and you choose to drink at these events, we expect you to behave safely and responsibly. Manager(s) who organize these functions must ensure responsible alcohol distribution and use.

Extra Focus — Each PJIAE department is responsible for establishing and maintaining department-specific policies and procedures that are designed to meet or exceed applicable environmental, health, safety and security laws and standards. The PJIAE aerodrome manual provides the National Aerodrome Standards that PJIAE and its users are required to comply with, to meet the requirements stipulated under art 171 of the Aviation Decree.

The PJIAE Safety and Security Program is based on standards and recommended practices as laid down in ICAO annex 17, ICAO document 8973 and the National Security Program.

The PJIAE ATS Standard Operating Procedures Manual (ATSSOP) contains the standard requirements and procedures pertaining to the provision of air navigation services and are mainly based on the requirements as laid down in ICAO annex 11 and on the requirements of general measurements/provisions for execution of art 22 lid 1 of the Aviation ordinance.

Protection of personal information

Definition — Generally, “personal information” is information relating to an individual whose identity is known or can be figured out from the information by direct or indirect means. This definition is not exhaustive.

Examples include an individual’s name, address or family data.

At PJIAE, we respect personal privacy. Everyone in the company has a role to play in protecting and securing personal information. Any concerns related to a potential and/or actual breach of personal information are serious in nature, are thoroughly investigated and, if appropriate, measures are taken, up to and including immediate termination of employment, to the extent permitted by applicable laws. Non-employees may have their services terminated for violating this Policy and related governance. PJIAE collects certain personal information about many different types of individuals, including our employees, passengers, and those with whom we conduct business. Collection and use of personal information is important to our business, but unlawful use or disclosure of this information could hurt the person or persons about whom the information pertains, PJIAE and our stakeholders. For these reasons, we are committed to the lawful stewardship of personal information.

Do The Right Thing Right

- If you have access to personal information, you have a responsibility to safeguard it, use it only for lawful purposes and share it only with authorized persons.
- Comply with specific protocols or agreements with respect to how PJIAE handles personal information, for example, commitments made in a PJIAE policy or website privacy statement.
- Use appropriate security measures to protect personal information against improper access, destruction, alteration, storage or use.
- Know your function’s policies and procedures for protecting personal information. Also, be aware that special rules may apply to some types of personal information and certain processes that you may undertake.



Q: What should I do if I think personal information has been disclosed inappropriately?

A: Promptly call the SXM Airport Business Conduct Line to report your concerns so that the matter can be investigated. PJIAE has a responsibility in some cases to notify individuals if we learn that there may have been a breach in the security of their personal information. PJIAE will make this determination and respond appropriately.

Use of company systems

Extra Focus — Examples of company systems include PJIAE's computers, e-mail, voicemail, instant messages, telephone records, networks, and Internet access.

Company systems are corporate assets that generally should only be used for company business. All PJIAE systems and the records and information stored on them are the property of PJIAE regardless of how you mark or label them. Generally, you should not expect any confidentiality or privacy when using company systems. Where legally permitted to do so, PJIAE may at its sole discretion inspect your files and messages or monitor your Internet usage at any time without advance notice or consent. Use of a company system constitutes consent to inspection, monitoring and access by PJIAE, as permitted by law.

Do The Right Thing

- Never create, send, display or receive inappropriate, offensive or disruptive material on any PJIAE system.
- To protect yourself and PJIAE, you should not share your password for any PJIAE system.
- Do not expect confidentiality or privacy when using company systems, except as provided by applicable law.
- Return all PJIAE property and equipment, including all information and records stored on them when your employment ends.

7. Our stakeholders

Conflicts of interest

Definition — A “conflict of interest” exists any time you allow the prospect of personal gain to improperly influence the way in which you conduct PJIAE's business. Some examples of conflicts include using your PJIAE position for personal gain, outside employment with a competitor and favoritism in awarding company business.

You are responsible for acting professionally and making business decisions without any consideration of personal gain. Avoid situations in which personal interests, outside activities, financial interests or relationships conflict or even appear to conflict with the interests of PJIAE. We prohibit such conduct.

Do The Right Thing

- Avoid situations where a reasonable person would question whether you were inappropriately influenced in making a business decision.
- Deal with suppliers, customers and everyone doing business with PJIAE objectively, professionally and fairly.





- Never seek or accept payments, fees, loans or services from any person or firm as a condition of doing business with PJIAE.
- Do not accept gifts from people or firms doing or seeking to do business with PJIAE. In certain specific situations where declining a gift would likely cause an offense or embarrassment, the *Conflicts of Interest Policy* provides a Courtesy Gift Exception that accommodates these rare and specific situations.
- Never do business on behalf of PJIAE with a relative or a person with whom you have a close, personal relationship.

Q: I've been invited to speak at a conference that I think will benefit PJIAE. In addition to a waiver of conference registration fees, the organizers have offered to pay me a small honorarium and to pay for my travel and hotel expenses. May I accept their offer?

A: You may not accept money for speaking at a conference or meeting. However, if your supervisor/manager/director determines that your attendance benefits PJIAE, you may accept a waiver of conference fees. You may also accept incidental meals generally offered to attendees. Travel, hotel, and all other related expenses should be paid by PJIAE as provided in PJIAE's travel policy.

Financial integrity

Important Note — Financial records are not only those that we report publicly. Records containing financial information are found across the company and form the foundation of our public disclosures. Every financial record in every function must be accurate, true and complete.

We have a responsibility to provide full, fair, accurate, timely and clear disclosures in reports and documents we file. You must help ensure that we meet that responsibility. Our CEO, the CFO and the Director of the Financial Division have additional responsibilities and must adhere to a specific Code of Business Conduct and Ethics that supplements this Code.

Do The Right Thing

- Keep PJIAE records accurate, true and complete.
- If you are involved in preparing reports and documents for PJIAE, be sure that the content is full, fair, accurate, timely and clear.
- Cooperate fully with PJIAE's independent public accountants and never take any action to coerce, manipulate or mislead them.

Business Records and Information

Manage all records and information in a manner that protects the integrity of the information and ensures appropriate access. Our policy relating to records and information facilitates decision-making, supports PJIAE's legal, financial, regulatory, and contractual obligations, and promotes organizational efficiency.

Do The Right Thing

- Be familiar with the *Records Retention Schedule* as it applies to your function's records.
- Retain all records for the time needed to comply with applicable laws and PJIAE's policies.



- Never create, alter, or destroy records, information, data or documents with the purpose to impede the efforts of any governmental or regulatory agency.

Q: I am moving to a new department in PJIAE. Should I take all my records with me?

A: Many of your electronic records will automatically transfer with you, such as e-mails and those stored in electronic folders. However, records that are part of your old department's business should stay with that department. Before you transfer, talk with your supervisor/manager/director about the best way to ensure that the proper records (including electronic records) remain with your old department.

Safeguarding PJIAE's Information

Important Note — Whenever the Code talks about laws, this includes regulations, too. Similarly, when you see a reference to PJIAE's policies in this Code, it includes PJIAE's written policies, values, guiding principles, standards, procedures and other governance documents.

Information is an especially important asset for a company like PJIAE. It gives us a key competitive advantage and must be protected. Information you create or receive on the job is the company's property, and you are responsible for safeguarding it.

PJIAE is well known in business and financial communities, and you may know someone who would be interested in information you have about PJIAE. However, you should never discuss PJIAE's protected information with anyone outside the company unless such disclosure has been approved in advance as required by our policy. (Public Relations)

Before sending confidential data to any outside companies, institutions, or individuals, you need to obtain appropriate Corporate Authorization as well as a written confidential disclosure agreement. Contact the Legal Department to obtain a confidential disclosure agreement or to ensure the appropriate confidentiality language is included in the applicable agreement with such company, institution or individual.

Do The Right Thing Right

- Understand the different types of information that PJIAE has and know how to properly use and protect them.
- Never use PJIAE's information for non-PJIAE business or personal endeavors.
- Never provide PJIAE's information to any third party without first getting corporate authorization as required by our policy. Also, use a confidential disclosure agreement when required by policy and follow other procedures in your function.
- When you have confidential third-party information, respect its proprietary and/or confidential nature. Do not use or disclose this information in a way that violates any legal or contractual obligations with the third party.

Extra Focus — Confidential disclosure agreements protect a party's disclosure of information by requiring the party that receives the information to use and handle it in a confidential way. Often, when two companies are considering doing business together, they sign such an agreement to share information that will enable a better understanding between them.

Investor and Media Relations



PJIAE has a responsibility to maintain an orderly flow of information to the public and to its investors. All PJIAE's dealings with its investors and the media, including reporters, must be properly managed to make certain that accurate and timely information is given to investors and the public. We also need to be careful to comply fully with all laws governing our disclosures.

Reporters, media representatives, investors, and investment analysts may try to solicit information directly from you. Only the public relations officer/managing director or designated Corporate Communications spokespersons are authorized to speak to the news media. Investor inquiries will be handled in a similar manner by the Chief Financial Officer (CFO) (and or the Director Financial Division, if so assigned by the CFO). If you receive an inquiry about PJIAE from an investor, financial analyst, the media or any other outside party, you should not respond to the request.

Do The Right Thing Right

- Refer all requests for information from the media or financial community to the appropriate PJIAE resource

Q: During a fundraising barbeque, a reporter asked me what I thought the political candidates' positions were on issues that faced PJIAE. I wasn't sure what to say. Was I correct to not respond?

A: Yes. Your opinion might have been misinterpreted as an official statement from PJIAE. Any public statement about PJIAE should be reserved for the designated member of the Managing Board/Corporate Communications Department Spokesperson. The best thing to do is to say that you don't speak for PJIAE and refer the reporter to the appropriate media contact within PJIAE.

8. Additional Information about compliance at PJIAE

PJIAE's Compliance Program

PJIAE's compliance program is driven by PJIAE's commitment to conducting business with integrity and in compliance with all applicable laws. We do this by informing and educating staff and others who conduct business on our behalf about the requirements and our expectations. We also regularly monitor our compliance program to identify any existing compliance-related issues, to determine whether the program is operating as intended, and to identify potential improvements.

The major features of our compliance program include:

- Oversight by our Board of Directors (through its Audit Committee).
- A Compliance Officer, who is responsible for making sure that the necessary elements of an effective compliance program are in place. The Compliance Officer also reports to the Board of Supervisory Directors on compliance matters.
- A Risk Assessment Committee, which champions PJIAE's culture of compliance and business ethics by ensuring that it is the foundation of the company's strategy, goals and objectives. This Committee is chaired by PJIAE's Compliance Officer and is comprised of the Division Directors.
- A (soon to be installed) Compliance Council, which consists of senior management from each of the company's functions. Compliance Council members provide input and recommendations as to compliance priorities, policies, decisions, and strategic direction of the program.
- Written policies and supporting documentation such as this Code of Conduct, and our Compliance Policies.



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International Airport**
Operating Company N.V.

- Communication of our compliance program requirements through our Code of Conduct, our internal and external websites and other communication vehicles.
- Ongoing training and education of staff on our compliance program and its requirements.
- A SXM Airport Business Conduct Line, through which anyone, internal or external to PJIAE, can report misconduct without fear of retaliation. Callers may remain anonymous unless it concerns issues whereby anonymity is discouraged or not permitted by law.
- Routine monitoring of our compliance risks through normal processes embedded in our operations and audits that use a unified approach across our business activities. Results are reported to the Compliance Officer.
- Timely and appropriate investigations into reported concerns about potential compliance violations.
- Appropriate responses to violations of our policies and steps to prevent recurrence.
- A risk-based approach to the design of our Compliance Program and program activities.

Index

PJIAE reserves the right, at its sole discretion, to modify any aspects of the compliance program, including, without limitation, this code and company policies, at any time, for any reason, and with or without notice. If there is a conflict between this code and a specific policy, the policy currently in effect will govern.

The Code is available on the PJIAE website (intranet). The intranet version will contain any changes made after the date of any printed publication and will be the most current version of the Code.

List of policies

PJIAE Policies and Standards referenced in this code

A handwritten signature in blue ink, located in the bottom right corner of the page. The signature is stylized and appears to be a combination of letters and a flourish.



Princess Juliana
International Airport
Operating Company N.V.

List of Policies

PJIAE Policies and Standards referenced in this Code:

Code of Ethics for the CEO, CFO and Senior Financial Officers, 7

Confidential and Proprietary Information Policy, 7

Conflicts of Interest Policy, 5

Environment, Safety and Security Policy, 4; 6

Mandatory Safety and Security Training Policy, 6

Policy against Harassment, 6

Professional Conduct Policy, 6

Protection of Personal Information Policy, 6

Records and Information Management Policy, 7

Social Media Policy, 6

Standard for Gifts to PJIAE Employees

Travel Expense policy

Use of Company Systems and Internet Conduct Policy, 6

Whistleblower policy

A handwritten signature in blue ink, appearing to be a stylized 'V' or 'W' followed by a flourish.

Annex 4: Responsibility of the Contractors

The requirement of the contractors provided in the bidding documents are summarized below:

1. The Main Works Contractor/Bidder shall propose an **Environmental, Social, Health and Safety (ESHS) Specialist** as the Contractor's Key Personnel at the Site. The Bidder shall provide details of the proposed ESHS specialist including academic qualifications and work experience. The responsibilities of this specialist will include:
 - Implement all mitigation measures to address potential environmental and social risks and impacts as described in the ESMP and Contractor's site-specific management plans.
 - Implement the environmental monitoring plan of the ESMP
 - Carry out a job hazard assessment for each worksite to assess the potential hazards and implement mitigation measures to minimize risks.
 - Conduct weekly and ad-hoc toolbox training to the laborers on health and safety risks of the construction works.
 - Prepare monthly reports on ESHS implementation.
2. All Contractors/Bidders shall submit the **Code of Conduct** that will apply to the Contractor's employees and subcontractors. The Code of Conduct will state that the workers will comply with the following ESHS requirements:
3. Wearing of PPEs at all times in the workplace:
 - Non-discrimination in dealing with the local community by race, ethnicity, gender, religion, disability, sexual orientation, gender identity, social, or health status.
 - Respectful attitude while interacting with the local community.
 - Prohibit sexual harassment particularly towards women and children.
 - Prohibit violence, including sexual and/ or gender-based violence.
 - Respecting the reasonable work instructions.
 - Protection and Proposer use of the property.
4. All Contractors shall be required to submit for approval and subsequently implement the **Contractor's Environment and Social Management Plan (C-ESMP)**. The C-ESMP will include the following site-specific management plans on:
 - Occupational health and safety management plan.
 - Community health and safety management plan.
 - Waste management plan.
 - Wastewater discharges management plan.
 - Air and noise emissions management plan.
 - Hazardous material management and spill control plan.
 - Water supply and sanitation management at the worksites and workers' accommodations.
 - Management of labour influx and facilities for the foreign workers.
 - Labour recruitment procedures and labour management.
 - Traffic management plan.
 - Training plan for ESHS risks including HIV/AIDS, sexual exploitation and abuse, and gender-based violence.
 - Emergency Response Plan.
 - Grievance Redress Mechanism.
 - Demobilization plan after completion of works.

Annex 5: Occupational Health and Safety Measures in the Construction Works

Occupational Health and Safety Measures are included in the ESMP (Table 5.3). These measures will address the exposure to the following risks:

- Hazards at Work Site
- Work at height
- Rotating and moving equipment
- Electrical safety
- Workers facilities at the construction sites
- Health facilities at work sites
- Facilities at the residences of the foreign workers
- Child and youth labor
- Incidents
- Air pollution
- Noise emission
- Wastewater discharges
- Hazardous Material

The contractor will prepare a site-specific **OHS** management plan. The contractor will also carry out a 'job hazard analysis' at each new construction site to identify potential hazards that may arise from the proposed works or working conditions to the project workers, particularly those that may be life-threatening. The contractor will identify ways to eliminate or control these hazards through applying a hierarchy of control measures such as the elimination of risk through physically removing the hazard, engineering controls to minimize the risk, and finally use of personal protective equipment. The contractor will prepare a job hazard analysis report with the proposed control measures for each new work site for the PJIAE approval.

Annex 6: Emergency Response Plan

PJIAE has an existing Emergency Management Manual (EMM) in place to respond to the natural and man-made disasters. The airport is equipped with a state-of-the-art ATC Tower and Radar facility, Category 9 Fire and Rescue Service. This EMM includes (a) engineering controls (such as containment, automatic alarms, and shutoff systems) proportionate to the nature and scale of the hazard; (b) identification of and secure access to emergency equipment available on-site and nearby; (c) notification procedures for designated emergency responders; (d) diverse media channels for notification of the affected community and other stakeholders; (e) a training program for emergency responders including drills at regular intervals; (f) public evacuation procedures; (g) designated coordinator for EMM implementation; and (h) measures for restoration and cleanup of the environment following any major accident.

The existing EMM is also applicable to Project construction. However, to address emergency events associated with construction activities (e.g. fire and spills), the Contractor will prepare an emergency preparedness and response as part of C-ESMP. The Contractor will (i) mark the fire escape routes and train the workers on emergency evacuation from the terminal in case of fire, (ii) conduct Emergency drills regularly, (iii) have adequate fire extinguishers at the work site, and all site supervisors shall be trained with the operation of extinguishers, and (iv) have adequate spill kits for control of oil spills and leaks.

Annex 7: PJIAE's Stakeholder Engagement Plan (SEP) and Grievance Redress Mechanisms



STAKEHOLDER ENGAGEMENT PLAN



I.	<u>CONTENTS</u>	
II.	INTRODUCTION.....	2
III.	OBJECTIVES.....	3
IV.	HISTORY.....	3
V.	SCOPE OF APPLICATION	4
VI.	REQUIREMENTS	5
VII.	COMMUNICATING EFFECTIVELY	10
VIII.	THE CORPORATE IMAGE	10
IX.	THE STRATEGY.....	11
X.	GOAL SETTING.....	11
XI.	SENSE OF OWNERSHIP.....	13
XII.	TARGET GROUPS	13
XIII.	PROPOSED STRATEGY FOR INFORMATION DISCLOSURE.....	14
XIV.	RESOURCES AND RESPONSIBILITIES.....	15
XV.	ENVIRONMENT	16
XVI.	TIMELINES	17
XVII.	WHAT MESSAGE IS COMMUNICATED?	17
XVIII.	HOW IS THE MESSAGE COMMUNICATED?	18
XIX.	INTERNAL COMMUNIQUE/ STAKEHOLDER’S MESSAGE	19
XX.	PRESS RELEASES	19
XXI.	WEBSITE.....	19
XXII.	FACILITATION MEETING.....	20
XXIII.	SOCIAL MEDIA.....	20
XXIV.	PUBLICATIONS	21
XXV.	PRESS CONFERENCES	21
XXVI.	MONITORING AND REPORTING	21

II. INTRODUCTION

The Stakeholders Engagement Plan (SEP) recognizes the importance of open and transparent engagement between the Princess Juliana International Airport Operating Company N.V. (PJIAE) and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

Stakeholder engagement is an inclusive process conducted throughout the project life-cycle. Given the SEP's design and implementation, it can support the development of strong, constructive and responsive relationships that are important for successful management of a project's environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process. Furthermore, it is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts.

Activities to be performed at the Princess Juliana International Airport (SXM) will mainly point at: - restoring the terminal building to pre-hurricane conditions, with several improvements for increasing operational safety. The SEP highlights the way PJIAE plans to communicate with people who may be affected by or interested in our operations. It also includes a grievance mechanism whereby stakeholders and citizens can raise any concerns to the attention of the PJIAE both verbally, written (by post or e-mail) or by filling in a grievance form.

Sincerely,

PJIAE N.V.

Managing Board

III. OBJECTIVES

- To establish a systematic approach to stakeholder's engagement, which will assist to identify stakeholders and project affected parties, to build and maintain constructive relationships.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life -cycle on issues that could potentially affect them.
- To ensure that the appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow PJIAE to respond to and manage such grievances.

IV. HISTORY

The Princess Juliana International Airport (SXM) began as a US military airstrip in 1942 during World War II. The following year, the first commercial flight landed on December 3, 1943. The Dutch crown Princess Juliana then visited St. Maarten using the airport in 1944. Eventually, the airport was later officially named after Princess Juliana. In 1964, the airport was remodeled and relocated, with a new terminal building and control tower. The facilities were upgraded in 1985 and 2001.

Due to the increased passenger traffic and the forecasted growth at the time, the Princess Juliana International Airport was being heavily modernized following a three-phased masterplan, as commissioned in 1997.

Phase I was a short-term program to upgrade existing facilities and improve the level of service at various points. This included widening, strengthening and renovating the runway, increasing the bearing capacity of the taxiways, construction of a new apron and an upgrade of the (former) terminal building. Phase I was completed in 2001. The Simpson Bay community and the islands we serve were all kept informed on the plans and development of this undertaking.

Phase II included the construction of a radar facility and a new air traffic control tower, the construction of a new and modern, 27,000 square meters (290,000 sq. ft), terminal, capable of handling 2.5 million passengers per year, and the construction of a Runway End Safety Area (RESA) of 150 meters (490 ft), including a 60 meters (200 ft) overrun, on both ends of its runway, to comply with the International Civil Aviation Organization (ICAO) rules.

The new air traffic control tower and the radar station commenced operations on March 29, 2004, while the new terminal opened in late October 2006. The terminal has 4 jetways for large aircrafts. The masterplan also revealed that if traffic develops as forecast, Phase III of the masterplan would be executed, consisting of an extension of the new terminal building and the construction of a full parallel taxiway system.

On September 6, 2017, Irma a category 5 hurricane devastated St. Maarten with sustained winds up to approximately 185 mph. Three days later, on September 9, 2017, hurricane Jose, a category 4 storm, posed an additional threat to the island, but fortunately passed with minimal impact. Furthermore, ten days later, on September 19, 2017, another category 5 hurricane named Maria passed south of the island; whereby, St. Maarten suffered from tropical storm winds and immense rainfall. Due to this unrestrained hurricane season, the Princess Juliana International Airport (SXM) terminal building and airport infrastructure endured enormous damage, crippling the airport operations.

Meanwhile, the PJIAE erected the make-shift arrival and departure operations in the make-up area of the terminal building. Commercial operations were restored on October 10, 2017, a little over a month after the storms forced the closure of the airport facilities, which were immediately taken over by the Dutch, French and US military authorities. Four months later, on February 9, 2018, PJIAE commenced operations in the temporary Departure Pavilion, and a little over one month later, PJIAE opened its' Arrival Pavilion on March 22, 2018.

Returning concessions like Subway, AMA, Dutch Delight, Domino's Pizza, Market by Villa, Taloula's Flights, Relay, ESCA, Shipwreck Shop, Gouda Liquor Store, Le Bistro by Bacchus, Princess Promenade, Aunt Clara's, Johny's Burger and KAFFE were available to the travelers and partially to the public. The Package 1 - Temporary Operations of the reconstruction project also includes the immigration and emigration booths, offices, the reinstatement of the existing air-conditioning and sprinkler systems, the installation of the fire alarm and public-address systems, CCTV surveillance and security equipment, as well as IT systems and seating.

All the while, PJIAE worked on the insurance claim and simultaneously assessing various rebuild designs. In conjunction with the airport's 75th anniversary celebration, PJIAE opened the temporary arrival and departure operations within the terminal facility on December 15, 2018, which is referred to as Package 1. PJIAE continues to work on Package 2, the full restoration of the terminal building, which is greatly contingent on the results of the capital financing.

PJIAE highest priority is to restore the terminal building to pre-hurricane condition with several improvements for increasing operational safety.

V. SCOPE OF APPLICATION

Stakeholder engagement is the continuing and iterative process by which PJIAE identifies, communicates, and facilitates a two-way dialogue with the people affected by its decisions and activities, as well as others with an interest in the implementation and outcomes of its decisions and the project. It considers the different access and communication needs of various groups and individuals, especially those more disadvantaged or vulnerable, including consideration of both communication and physical accessibility challenges. Engagement begins as early as possible in project preparation, because early identification of and consultation with affected and interested parties allows stakeholders' views and concerns to be considered in the project design, implementation, and operation.

Meaningful stakeholder engagement throughout the project cycle is an essential aspect of good project management and provides opportunities for PJIAE to learn from the experience, knowledge, and concerns of the affected and interested stakeholders, and to manage their expectations by clarifying the extent of PJIAE’s responsibilities and resources. Stakeholder consultations provide input for, as appropriate, environmental and social assessment, project design, mitigation plans, monitoring reports, and further evaluation of the project, including the Environmental and Social Commitment Plan (ESCP), summaries of the assessment of all or part of PJIAEs’ environmental and social frameworks, and any other project plans that may be prepared. The level and frequency of stakeholder engagement conducted is proportionate to the risks and impacts of the project.

PJIAE encourages stakeholder’s engagement, as it supports the development of solid relationships that are imperative for the successful management of a project’s safety structure, environmental and social risks. Stakeholder engagement is most effective when initiated at an early stage of the project development process.

VI. REQUIREMENTS

PJIAE will engage with stakeholders throughout the project life-cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.

PJIAE will engage in meaningful consultations with all stakeholders. PJIAE will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.

The process of stakeholder engagement will involve the following, as set out in further detail in the below table.

In addition to regulatory authorities, PJIAE has identified both internal stakeholders, such as airlines, concessionaires and workers, as well as external stakeholders, such as community authorities, and other partners and institutions. For each stakeholder, the means of communication has been listed, as well as specific media that will be used to notify stakeholders of information, such as opportunities for public consultation or significant changes.

Stakeholder organization, group or individual	Potential role in the activity	Engagement strategy: How will you engage this stakeholder in the activity?	Follow-up strategy plans for feedback or continued involvement	<u>MOST</u> appropriate application of technique
Airlines (Main Office)	Provide insight into pilot project, lessons learned, and expanded services.	Meetings are held with the headquarter reps to better engage them on the ongoing projects and updates. We can also learn about their concerns and new developments which will be shared with our team and the associated stakeholders (selective information is shared).	Distribute project information for feedback and follow-up information.	<ul style="list-style-type: none"> • One-on-one meetings • Email • Monthly newsletter
Airlines/ Handlers & Concessionaires	Provide information on airport operational and reconstruction status, achievements and planned goals.	Present project information to this group of stakeholders and request that they keep their associated staff updated on the latest developments and implementations. Allow the group of stakeholders to provide their views and opinions. Distribute operational documents for review and/or input. Facilitate meetings using PowerPoint presentations or info-	Distribute information for feedback and follow-up information.	<ul style="list-style-type: none"> • Email • Monthly newsletter • Monthly facilitation meetings • Focus group meetings

		sessions. Record discussions, comments/questions raised and responses.		
External Stakeholders (Community authorities and NGO's)	Provide information to stakeholders about past, present and future planned activity at the airport and rebuilding efforts.	Provide update on projects and accomplishments. Organize regular meetings and signing agreements on cooperation on different development projects.	Stakeholders are encouraged to provide feedback via email or telephone (as listed on each e-newsletter or as reminded during the various meetings. Also, concerns can be forwarded via email or submitted by filling in the Public Grievance Form	<ul style="list-style-type: none"> • Email (selective) • Monthly newsletter • Local news media • Surveys • News media • Public Meetings
Staff & Trade Unions	Provide information on airport operational and reconstruction status, achievements and planned goals.	Accommodating regular department/ division meetings to provide updates on the projects, receive feedback and the planned goals.	Feedback is provided during the open floor segment of meetings and/or Q&A sessions for staff.	<ul style="list-style-type: none"> • Email • Monthly newsletter • Monthly division/ department meetings
Air Service Development Committee (ASDC)	Provide insight into ongoing projects and general updates on hotel rooms and destination development. Feedback is also received from all stakeholders of the hub countries.	Engagements during live and/or tele-conference group meetings/ telephone/ email and e-newsletters.	For continued involvement hub partners are encouraged to provide feedback during our monthly meetings.	<ul style="list-style-type: none"> • Monthly tele-conference or live meetings • Email • Monthly newsletter • Monthly facilitation meetings

Financial Institutions	Provide information on airlines activity for the respective quarter as well the organization financial status.	Present overview on financial position as well the current and future operational performance.	Discuss the organization financial overview and plans.	<ul style="list-style-type: none"> • One-on-one meetings • Quarterly financial and operational reports • Formal Letters • Conference calls
Government	Provide insight into the project, lessons learned, and expanded services.	Regular meetings are held with the respective ministries and government agencies to better engage them on the ongoing projects and updates. We can also learn about their concerns and new developments which will be shared with our team and the associated stakeholders.	Distribute project information for feedback and follow-up information.	<ul style="list-style-type: none"> • One-on-one meetings • Email • Monthly newsletter • Working Groups
Bi-weekly meetings with Supervisory Board of Directors (SBOD)	The Managing Board provides insight into pilot project, lessons learned, finances, strategic plans and advocate for improved and expanded services and the general scope of the company.	Managing Board members are responsible for providing the pertinent information according to their core responsibilities.	No planned involvement beyond weekly/monthly SBOD meetings.	<ul style="list-style-type: none"> • Bi-weekly or monthly meetings • Formal Letters • Monthly newsletter
Media	Provide information to correspondents about the present and future planned activity at the	Press briefings are held to present the accomplishments made during the key	Provide accurate/relevant data and information to engage mass media.	<ul style="list-style-type: none"> • Press Releases • Monthly newsletter • Press Trips • Interviews

	airport and rebuilding efforts.	stakeholder meetings and process of project. The media is steered to further disseminate this information accordingly.		
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PJIAE will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was considered, or the reasons why it was not.

VII. COMMUNICATING EFFECTIVELY

The Corporate Communication Specialist (CCS) is charged with the responsibility of ensuring the corporate image of the Princess Juliana International Airport – SXM is presented and maintained in a tasteful manner. The CCS recognizes the corporate identity and the content which is complied should also be accurate and timeless. It is imperative to ensure that all local and international media are equally informed of the latest updates of the SXM Airport. The stakeholders must be able to allocate information from all the relevant avenues to be well informed.

The Corporate Communication Specialist has also established effective relationships with the media at large, in efforts to garner support when necessary. The multi-media faceted function incorporates all areas to the role and to manage them accordingly.

The overall function of the role boldly emphasizes the mission statement throughout the vast disseminated information. “To be the regional leaders in providing safe, secure, quality and profitable airport services that contribute to the general economic and tourism developments of St. Maarten/St. Martin and the region we serve.”

The company’s tagline, “The Experience Will Move You,” will be magnified to remind the stakeholders that PJIAE is committed to sustaining our service quality at the award-winning Princess Juliana International Airport - SXM.

The efforts being made by the Communication Department is more critical than ever, as the world awaits the completion of the terminal building post hurricanes. There is a need for a consistent message on this major project and the updates from the airport community alike.

The stakeholder’s engagement plan will be established as a guide to maintain the tasks at hand. The key messages should always represent the sentiments and directives given by the Managing Board of the Princess Juliana International Airport – SXM.

VIII. THE CORPORATE IMAGE

The corporate image embodies the corporate identity of the SXM Airport and assures everyone that they are associated with the best airport. It also influences attitudes of passengers, hub partners, media, employees, and influencers. It also refers to the appearance and feel of the cooperation.

The corporate image also coincides with the reputation of the organization. This is even more reason to honor our mission statement and highlight the excerpt which reads “To be the regional leaders in providing safe, secure and quality service.”

In efforts to build and strengthen the corporate image, the primary goal of the Corporate Communications is to maintain and build the identity in accordance with and facilitate the corporate business objectives as follows.

-
- Promotions – promote your identity tools (logo, slogan, brand, pantone colors, through advertisements etc.).
 - Maintaining your mission statement and vision – announce it to the world and boast of your track record.
 - Corrective actions – There will be the need to adjust the objectives if it is not working according to plan.
 - Training – There will be the need to train the SXM Airport employees and the stakeholders on our mission and corporate identity tools, so they can transmit our message via the word of mouth method, external meetings and other effective tools.

IX. THE STRATEGY

It is the goal to inform all entities and the world at large of the latest and ongoing developments at the Princess Juliana International Airport – SXM.

All mediums will be utilized to convey positive and effective methods, updates, announcements, while fulfilling the mission statement of the Princess Juliana International Airport – SXM.

Through targeted networking groups, the Corporate Communication department will maintain sustainable relationships in efforts to expand its media and airline business partners.

We must allow the latest rebranding of SXM Airport to create a life of its own through media campaigns that forces the stakeholders to view the airport as the core gateway to the country. The three letter IATA code should also serve as a brand for tourism opportunities.

It is the intention to dominate all avenues of multi-media to bring home the message that the island and the airport is equally opened for business post hurricanes Irma and Maria.

The goal of the Stakeholder's Engagement Plan is to also focus on clear goal setting points. It is the intention to list the project's intended goals in measurable ways (quantitative). The plan will also show the techniques used to motivate and lead all related projects.

X. GOAL SETTING

The job scope of the Corporate Communication Specialist is quite vast and therefore the goal setting points are crucial to the communication flow of the SXM Airport. The information which is channeled from the Managing Board of the Princess Juliana International Airport- SXM should be systematic to reach everyone effectively and efficiently.

	GOALS	TIMEFRAME
1	E- Newsletter	January 2018 to present (monthly)
2	Press Releases	November 2017 to present (varies)
3	Radio and TV Advertisement	November 2018
4	Print / Online Media Ad	January 2018 to present (monthly)
5	Public Service Announcement	November 2017 to present
6	Publications	March 2018 to present (monthly or when requested)
7	Website Management	November 2017 to present (live flight updates, content)
8	Media Campaign	November 2017 to present (quarterly/ upon request)
9	Internal Notices	November 2017 to present (based on urgent requests)
10	Social Media	November 2018 (annually)

	GOALS	TIMEFRAME	
11	Photo Shoots	November (annually)	2018
12	Media Policy	November (revisited annually)	2018

XI. SENSE OF OWNERSHIP

It is the intention to stimulate positive public mindsets, attitudes and foster a sense of ownership of the Princes Juliana International Airport- SXM (The people’s airport). The stakeholders (partners) should no longer have concerns about the lack of data regarding major updates of SXM Airport. The main purpose of this is to develop trust and build the consistency of your credibility.

Maintaining effective communication within the organization is equally important to avoid the dissemination of erroneous information. This practice can result in low morale and productivity of the airport community. The internal parties assigned to leadership roles should be informed that it is imperative to share the accurate information with their staff. The internal communication objective is to strengthen the network that gets important information to staff members and the airport community.

The message of “We are SXM Airport,” will be used to declare the re-opening of the newly reconstructed terminal building in 2020. In the patriotic essence of the achievement, the faces of the elderly, retirees, long standing employees and uniformed school children will be captured through video and audio to ring home the “We Are SXM Airport, theme.

XII. TARGET GROUPS

All stakeholders should be made aware of specific information provided by the Management of the Princess Juliana International Airport –SXM. Although the messages may vary, it is the responsibility of the Corporate Communication Department to ensure that the right message gets to the right channels. In some cases, we will have to refrain from sharing delicate information from some target groups to control the message.

To implement an effective stakeholder’s engagement plan we must identify the internal and external target groups, which are affected by the said plan. The plan should also identify the necessary tools needed to effectively communicate to the groups. The target groups include the following:

- **Internal target groups:**

The employees of the Princess Juliana International Airport – SXM, Airlines, Handlers, Charters, The Retail Concessionaires, The F&B Concessionaires, Goddard Catering Services, Sol Group, Cargo Operators/Handlers, Customs, The Alpha Team – Police, Immigration, Wheelchair Services, VIP Services, Airport Taxi Association St. Maarten Civil Aviation Authority, Commuters and FBO Operators.

- **External target group:**

The island population of St. Maarten/St. Martin, The Passengers, The Government of St. Maarten, Airline Headquarter Affiliates, The Collectivité of St. Martin, The St. Maarten Tourist Bureau, Tourism Office of French St. Martin, Tourism-based Stakeholders, Hub Partners, International Air Transport Association (IATA), Simpson Bay and Beacon Hill Communities, Island's Airport Safety Committee (IASC) International Civil Aviation Organization (ICAO), St. Maarten Civil Aviation Authority, Air Service Development Committee (internal and external joint group).

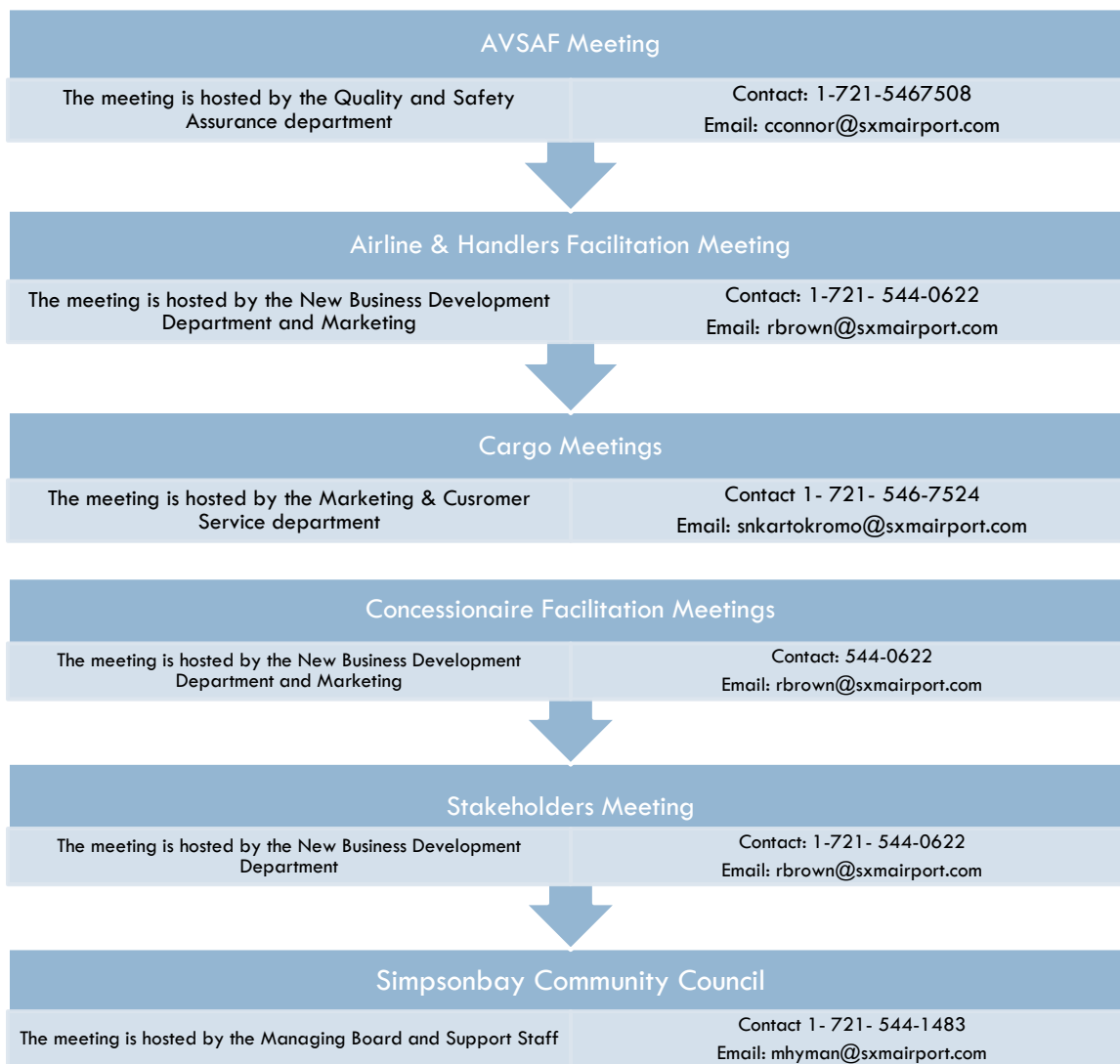
XIII. PROPOSED STRATEGY FOR INFORMATION DISCLOSURE

The tools utilized to disseminate the pertinent information on behalf of the SXM Airport is equally as significant as the issued statement. Over a period, the media was the key tool utilized to reach the stakeholders and the masses. Leading the way forward, there are now other channels that lend to the distributing of vital content.

<u>Latest Tools</u>	<u>Common Tools</u>
<ul style="list-style-type: none"> • Travel Booking Web pages • Website www.sxmairport.com • Link Exchanges • Hub Partner presentations/materials • E-Newsletters • Tourist Office Websites, blogs and e-newsletters • Stakeholder's newsletters and blogs • Social Media (Twitter, Instagram and Facebook) • Co-branding at Conferences • Press Fam trips • Mobile Group chats • Everbridge System • Tours 	<ul style="list-style-type: none"> • Press Release • Internal Notices/Memos • Public Service Announcements (PSA) • Print Media Ads • Facilitation Meetings – Concessions, Airline/Handlers, Cargo, Immigration, Customs, Alpha Team –Police, VIP, Taxis and Car rentals. • Info-Sessions • Flyer Announcements • Media Kits (post events) • Publications – Magazine features, articles, ads, and highlights • Workshops • Video and Radio Advertisement

XIV. RESOURCES AND RESPONSIBILITIES

The Managers and Directors of the Princess Juliana International Airport (SXM) are responsible for the execution of the elements of the Stakeholders Engagement Plan. The management team spearhead the facilitation meetings and partake in the external stakeholders' meetings. Efforts are also made to travel to international conferences and workshops to present updates on the ongoing projects, safety updates, and newly implemented technologies, whilst announcing to the world that we are operational. An adequate budget has been allocated for several departments to host meetings to address our stakeholders. In some cases, the costs are shared with external stakeholders who invite our professionals to address the tourism-based organizations/companies.



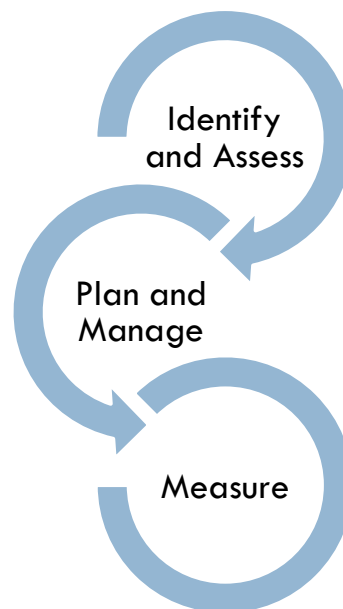
All meeting minutes are compiled and submitted to the Executive Secretariat department. The findings are later disseminated to the invited stakeholders by the responsible departments. The assigned departments mentioned above are charged with the documenting, tracking and managing the information.

XV. ENVIRONMENT

The Simpson bay AND Beacon Hill Community Councils are organizations which has shown great interest in the ongoing projects at the Princess Juliana International Airport (SXM) given the nearby proximity to its natural and other resources. The area is located near the airport and separated by the fencing of the airport grounds. The council includes community leaders and civil society organizations which work in or with the affected community. The members of the council have in-depth knowledge about the environment and social characteristics of the project area. Given the proximity, the council members receive the opportunity to discuss their concerns during the open floor period, following the airport's team presentations. Some of the topics presented to the community-based group include the following:

- New Aircraft Hangers
- Fuel Farm
- Fixed Based Operations (post groundbreaking update)
- New Goddard Catering Building
- Rescue and Firefighting Building

It is essential to share all sustainable practices of the airport and how this affects the environment and the overall operations. During the meetings the airport team must be prepared to also take advice from the council which will be in the best interest of all parties. In-house stakeholders can also report their concerns by using the “safety suggestion box,”. The Quality and Safety Assurance department records and manages the box (anonymous submissions). We must ensure that we identify and assess the concerns, then plan, manage and measure accordingly.



XVI. TIMELINES

The timelines of the major projects are usually determined by the Managing Board members (CEO, COO and CFO). The projects and milestones achievements are announced during the Division Directors/Managers meeting, whereby performance targets are presented for the year. The performance targets comprise of an objective, target dates and key performance indicators. The COO has already presented the COO Operating plan to the Technical Director, Project Manager, Corporate Communications Specialist, ITT Management and Operations Director. The COO Operating Plan also serves as a guide to ensure that the division which is responsible for the major project, is in line with the necessary goals brought forth by the COO. The relevant information which is extracted from the COO Operating Plan is later communicated to the stakeholders and managed accordingly.

The plan features the following points:



XVII. WHAT MESSAGE IS COMMUNICATED?

- Our standardized message to the world on behalf of the Princess Juliana International Airport (SXM) includes the following points:
- We communicate that the SXM Airport maintains a safe, efficient and secure airport operation.
- We communicate our ongoing efforts to maintaining the status of regional leaders.
- We communicate that SXM Airport contributes to the general economic and tourism development of St. Maarten and the hub partners alike.

- We inform everyone about the SXM Airport organizational structure of the internal leaders (Managing Board) and by extension the Supervisory Board of Directors (SBOD) and the Holding company.
- Our message includes general information about St. Maarten/St. Martin, as a destination. The current SXM Airport brand maintains that the airport must be cohesive with the destination, hence the rebranding from PJIA to SXM Airport (PJIAE). The management ensured that the stakeholders were updated about the rebranding through info-sessions.
- We communicate all safety campaigns and concerns to the stakeholders via the relevant departments and facilitation meetings.
- We maintain that no labor disputes are communicated.

XVIII. HOW IS THE MESSAGE COMMUNICATED?

The goal is to maintain an effective management of the media, public relations and the stakeholders alike. Communication to the stakeholders is forwarded through a vast number of mediums which encompasses the following avenues:

<ul style="list-style-type: none"> • Social Media Posting • Print Media • Press Conferences • Tourism Stakeholder's meeting • Annual Reports • Launch Events • Presentations • Publications • Press Releases • Website • Internal Notices • Video Recordings 	<ul style="list-style-type: none"> • All Staff emails • Ads • PSA's • Newsletter • Facilitation Meetings • Info-sessions • Orientation • WhatsApp Messaging (internal group chats, etc.) • Radio • Television • Blogs
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XIX. INTERNAL COMMUNIQUE/ STAKEHOLDER'S MESSAGE

The stakeholders are informed of the strategic direction of the company. The stakeholders should rest assure that the overall vision connects with its' bottom line and required safety standards. Additionally, the vision of the organization is incorporated and reflected throughout each communique.

XX. PRESS RELEASES

Press releases will be disseminated to the stakeholders in a timely manner. This form of communication is also forwarded to the Airlines and Handlers, concessions, cargo, Airport Taxi Association, car rentals management, immigration, police and the customs department. A network of local, regional and international media receives press releases from PJIAE.



XXI. WEBSITE

Another vital communication tool that is used to communicate information to the world is the SXM Airport website. The website serves as a road map of the entire operations. The airport must engage with the stakeholders to acquire the accurate information to post accordingly. Key stakeholders should be highlighted for the users to gain the necessary information.

The Corporate Communication department conducts systematic monitoring of the website hits and the frequently visited tabs. The results should serve to assess any further changes and/or updates which may be required from the stakeholders or PJIAE.

XXII. FACILITATION MEETING

The Princess Juliana International Airport (SXM) also hosts monthly facilitation meetings which are convened with the airport community partners to update them of general affairs at the airport. There is also a Q and A and round table sessions which is made available for feedback by the stakeholders. The following facilitation meetings are arranged to better inform the stakeholders about the latest developments and more:

- AVSAF - Aviation Safety meeting
- Airlines and Handlers Facilitation meeting
- Concessionaire Facilitation meeting
- AVSEC - Aviation Security meeting
- Cargo Concessionaire Facilitation meeting
- Public Transportation Facilitation meeting
- Tourism Stakeholders meeting

Throughout the project life-cycle the Management Board grants the stakeholders the opportune time to engage in walk-throughs and sessions to better gain clarity of the operations and/or new method. The inclusion lends towards a more hands on approach, allowing the stakeholders to provide feedback *to raise issues and grievances* in areas that the airport management may or may not have overlooked. The strong, constructive and responsive relationships are important for the successful management of a project's environmental and social risks. In 2018, the Package One – Temporary operations project showcased the above-mentioned inclusion of the stakeholders for the reconstruction of the terminal building. Management plans to grant the stakeholders the same honor to give input on the Package Two - Project on the road to the official reopening in 2020. The input allows for effective and inclusive engagement with project-affected parties throughout the project life -cycle on issues that could potentially affect them. Management ensures that the appropriate project information on environmental, social risks and impacts are disclosed to stakeholders in a timely, understandable, accessible and appropriate manner.

The Managing Board and the Directors engage in facilitation meetings to inform the stakeholders about the latest projects and project designs which will later be materialized at the airport. The stakeholders can also provide feedback during the sessions and follow up questions, in efforts to provide advice accordingly.

XXIII. SOCIAL MEDIA

Social media provides travel brands with the adequate tools to place airline businesses in the forefront of travelers. This builds a strong social presence around the travel brands and influences consumers as they research and plan their vacations. There are multiple ways to leverage social media to influence the potential passenger, the SXM Airport uses the popular spectacular landings and take-offs to drive viewership to the social media pages and by extension to the island of St. Maarten. Link exchanges are also carried out with the tourist offices of St. Maarten and St. Martin to highlight the island's nightlife,

culinary offers and activities. The stakeholders can only capitalize on this as the airline bookings will correlate, as the interest peaks.

The social media gateways that are used to communicate to the globe includes the following:

- Twitter
- Instagram
- Facebook
- LinkedIn

XXIV. PUBLICATIONS

The international or local publications are done through invited or solicited requests for further coverage of the SXM Airport. The exposure is aligned with substantial and relevant media entities, to ensure accuracy and unbiased reporting. The Corporate Communication department conducts the necessary research from the airport departments and the stakeholders to forward unto the major publication companies.

In some instances, the SXM Airport partakes in paid advertisements via advertorials and/or ads in a variation of print or online publications.

Currently the following publication types are used:

<ul style="list-style-type: none">• Fact Sheet• Portable Guides• Journals• Newsletters• Advertorials• Travel and Leisure magazines	<ul style="list-style-type: none">• Air Service development magazines• General Aviation online and published magazines• Transportation and Cargo magazines• Airport magazines• Airline magazines• Civil Patrol magazines
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XXV. PRESS CONFERENCES

Press Conferences are organized to make major announcements by the Princess Juliana International Airport (SXM)., as they are mainly strategic communication interventions. The most relevant and reputable media are invited to gain added insight on the latest SXM Airport updates. In some cases, the airport must interact with the stakeholders for information as the press may or may not want to know about our services or lack thereof. At given points there are press conferences hosted when there is an airline inaugural ceremony or a grand opening of an airport concession.

XXVI. MONITORING AND REPORTING

Management are prompted to lead by example and drive positive transformation throughout the organization. It is imperative that the Supervisory Board of Directors, Managing Board, Management, employees and stakeholders operate in unison, in accordance with the company's strategic business and operating plans.

Directors and Managers are responsible for reporting progress to their respective superiors on a weekly basis. Additionally, they should proactively identify risks and mitigation plans to achieve effective results, as well as report challenges and obstacles timely.

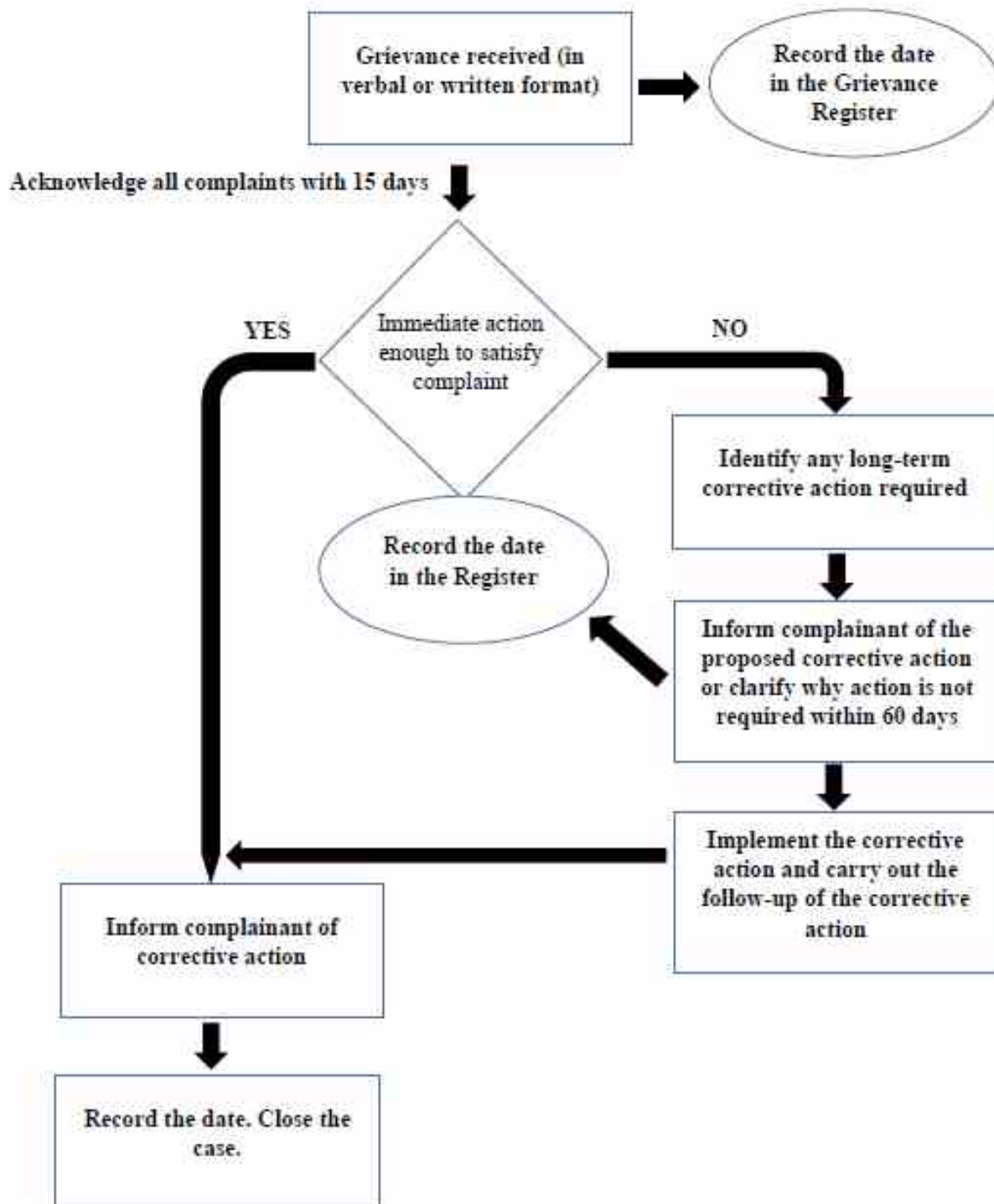
Public Grievance Form	
Reference No:	
Full Name:	
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address: <hr/> <hr/> <hr/> <input type="checkbox"/> By Telephone: <hr/> <input type="checkbox"/> By E-mail: <hr/>
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident/Grievance	<input type="checkbox"/> One-time incident/grievance (date <hr/>) <input type="checkbox"/> Happened more than once (how many times? <hr/>) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Signature: _____

Date: _____

Please return this form to: Audrey St. Luce-Jack, Communication Specialist at
ajack@sxmairport.com or Te l: +1 (721) 520-3764

Flowchart for Processing Grievances





Attachment (B)

Grievance Review Sheet PJIAE N.V.

Employee: _____ () Original Filing

Job Title: _____ () Appeal

Department: _____ () Final Appeal

Supervisor: _____

Description of grievance: (Please attach additional sheets if needed)

Employee Signature: _____ Date: _____

Answer to grievance: _____

Airport Representative Signature: _____

Date: _____