



**Atlantic** 

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# Meeting the Sustainability Challenge

**Gordon Deane**  
Chairman

***"Atlantic's role as an LNG producer has enabled us to identify and unlock the full potential of current opportunities, which will deliver value for Trinidad and Tobago for years to come."***



*Atlantic is harnessing LNG's current value to create opportunities for future generations*

The winning companies of the present and future will be those that position sustainability at the heart of their business.

At Atlantic, we recognise that sustainability is about ensuring that we create value for all. We continue to do this by returning value to our shareholders, minimising our impact on the environment and ensuring the development of our employees, suppliers and our communities. Atlantic's role as an LNG producer has enabled us to identify and unlock the full potential of

current opportunities, which will deliver value for Trinidad and Tobago for years to come.

We remain committed to delivering benchmark performance as a preferred operator, employer, business partner, neighbour and corporate citizen, and to fulfilling our responsibility to future generations.

**Gordon Deane**  
**Chairman**



# The Importance of Sustainability



## Atlantic

**Nigel Darlow**  
Chief Executive Officer  
Reviews 2011

***"Sustainability at Atlantic is not only about our own business. We actively seek to balance economic growth with development and the protection of today's resources for the benefit of future generations."***

**As a global LNG company Atlantic will be judged not only by how well we perform but also by the extent to which we do so responsibly and sustainably. This is why Atlantic's commitment to the development of our people, communities and the environment is so important, and continues to shape the way we do business. Our aim is to embed sustainability across all areas of our business.**

## OUR BUSINESS

Embedding sustainability is a journey. At the operational level, the journey has been focused on enhancing the reliability, availability and safety of our facility. We have also been focused on strengthening our corporate governance and managing our costs. In 2011 the journey took us through some very significant milestones.

Our facility's safety record continued to be industry-leading. In 2011 we achieved the milestone of reaching 14 million man-hours without a Lost Time Injury (LTI). This was one of the year's highlights, a powerful testimony to the seriousness with which our company engages with personal and process safety. It is also testimony to our work in deepening our partnership with the service providers who work on our facility, inviting them to help us build the Atlantic safety culture.

The 27 gas turbines that are the heart of our facility achieved a reliability rate of over 99.5%, an unparalleled performance rating in the LNG world. Our engineering teams also developed a maintenance procedure that reduced the duration of facility defrost procedures from a maximum of 7-8 days to less than one day. This procedure has not only helped to increase our production days, but also increased potential revenue for our customers and the Government and people of Trinidad and Tobago.

Our corporate governance has been strengthened by our ongoing work in

aligning relevant systems and processes to the UK's Anti-Bribery and Corruption legislation. This work supplements already existing structures related to our Code of Ethics and our employees' Gift Register.

In 2011 we continued our cost management drive, inviting employees to identify any opportunities for savings throughout the business. This will remain a focus going forward, as the ever-changing global LNG market will require us to sustain a cost profile that is both competitive and prudent.

## OUR PROGRAMMES

Sustainability at Atlantic is not only about our own business. It is also about delivering benefits for future generations. In 2011, we continued to develop our relationships and build our presence in local communities. Our programmes in sport development are mostly targeted at primary school children – seeking to maximise the potential of the young generation of Trinidad and Tobago. Atlantic invests in the Atlantic National Primary Schools' Football and Cricket Leagues, as well as the Atlantic National Primary Schools' Track and Field Championships – each focused on the pursuit of excellence, health, wellness, and the strengthening of the fabric of our society. Late last year, we partnered with the Real Madrid Foundation. Through this partnership, we are able to enhance the capability of young people and football coaches here in Trinidad and Tobago leading to the continuing development of national footballing talent.

# The Importance of Sustainability



*Artwork from the Boys' Nature Nurture Camp*

Atlantic's contribution to youth development through sport was recognised by the Ministry of Sport when Atlantic was awarded the Corporate Champion Award at the inaugural Spirit of Sport Awards in December 2011.

Additionally, in 2011 we continued our partnership with BG T&T and bpTT on the Boys' Nature Nurture Programme, which received the Energy Chamber's Social Investment Prize at the Chamber's Annual Corporate Social Responsibility (CSR) Awards.

Our partnership with our home community has been focused on Point Fortin's continued socio-economic development. This has involved our sponsorship of community-based programmes in education, skills training, youth and sports development. It includes one of our flagship programmes, the Point Fortin's Finest, which is now

***Our partnership with our home community has been focused on Point Fortin's continued socio-economic development.***

in its twelfth year. The Point Fortin's Finest continues to provide bursaries and leadership development to the Borough's top ten students in the annual SEA examination.

In 2011, Atlantic, the Point Fortin Borough Corporation and the Inter-American



*Turtle conservation is an important initiative*

Development Bank (IADB) partnered to create the Local Economic Development (LED) Project. This initiative will help to create a sustainable framework to improve livelihoods and to diversify economic capabilities in Point Fortin in four priority areas: institutional capacity; development of micro, small and medium enterprises; human development, especially youth; and learning and communication. This Project and its related programmes will be launched in 2012.

Turtle conservation is another initiative which we support, through our partnership with the Turtle Village Trust (TVT). As sole sponsor of the National Sea Turtle Tagging and Monitoring Programme, Atlantic helps to facilitate the TVT's annual observation and tracking of the leatherback, hawksbill and green turtles that come to nest on Trinidad and Tobago's beaches. The information collected by the TVT helps with the management of the world's turtle

population. This endangered species is crucial to the global marine ecosystem.

Atlantic is rightly proud of our sustainability programmes – but these take a lot of effort and resources to deliver. So with this in mind I would like to thank our employees, contractors, suppliers and partners for their ongoing commitment and efforts towards achieving our sustainability objectives, and for championing our Aspiration to inspire people, maintain pace-setting performance and create an enduring legacy for Trinidad and Tobago.

### LOOKING FORWARD

The future for both the global LNG market and for Atlantic is very positive. Industry experts predict continued strong demand for LNG out to 2025 (and beyond), much of this being driven by ever-increasing Asian demand. Supply will struggle to match demand. Even with new LNG plants coming online in a few years, global demand is set to outstrip supply. Given this, global LNG prices will remain strong well into the future. In recent years Asia, Europe and South America have become the primary markets and destinations of choice for Atlantic's LNG – increasingly replacing the more traditional US market. In these markets LNG commands a premium price, and therefore the challenge is to maintain a reliable flow of LNG cargoes to these markets, and to keep these cargoes competitive against the other LNG exporters in the world.

So the future for Atlantic is bright. In 2012 we must ensure that Atlantic remains a world class global LNG business, continuing to make a significant contribution to the nation's people, communities and society.

**Nigel Darlow**  
**Chief Executive Officer**



# Innovation and Continuous Improvement

**Jean Andre Celestain**  
Chief Operating Officer

Looks at Innovation and Technology





While our industry is changing, so are we at Atlantic. How a company responds to change says a lot about its people, and there is no doubt that the people at Atlantic are at the heart of our business and of our success. Atlantic has a long tradition of adapting to uncertainty and achieving success, as a direct result of our flexibility and strong culture of innovation. Businesses such as ours are defined by the ability to innovate and embrace change – something which I am confident we will continue to do in the future.

We have built a strong platform based on safety, innovation and continuous improvement, upon which we continue to base our success. It is as a result of this foundation, and our capacity to adjust to change, that we were able to deliver solid performance in 2011 – a year in which we were faced with significant business challenges. Against the backdrop of unforeseen challenges in gas supply, and increased activity in our operations, I am pleased to report that we continue to achieve operational excellence.

### OUR PEOPLE AND INNOVATION

Industry expertise is one of Atlantic's core strengths and one which the company continues to foster for the future. We continue to take pride in the capacity of our people and their penchant for innovation.

This was no less evident in 2011, as the company identified new opportunities through which Atlantic would continue to build its reputation in the global LNG industry. In 2011, a cross-functional team led the development of an innovative solution to reduce total defrost time on the Trains. Again, we maintained a strong focus on our core principles of continuous improvement to reduce defrost time from a maximum of 7-8 days to less than 24 hours. This results in the addition of more than 15 production days per year.

# Innovation and Continuous Improvement

Additionally, this innovation supports our commitment to the environment, as it also significantly reduces our emissions from flaring during maintenance activities.

Pioneering solutions like these drive growth and represent the revolutionary thinking and teamwork which continue to strengthen Atlantic's position in the global LNG industry as a model for best practice in LNG operations.



*Our Train 4 Turnaround was safely completed*

## **SAFETY AND ASSET INTEGRITY**

At the end of 2011, we had reached 14 million man-hours without a Lost Time Injury (LTI), and this result is driven by our continuing to make safety our highest priority. During the year, we increased our total number of man-hours by 66% to ensure delivery of key projects such as the Train 4 Turnaround. Notwithstanding the increase in man-hours, we successfully and safely completed this massive undertaking, and this is a demonstration of the commitment of our employees and contractors in striving to manage and reduce risks across our operations, and improve safety.

Our goal for 2012 is to continue to remain vigilant and maintain our focus on the safety of our people. Our approach around

safety, which includes regular management communications and interventions, adherence to operational practice and procedures and reinforcement of our safety commitments, will continue to guide the way in which we operate in 2012. We have a responsibility to ensure the safety of our workforce, as well as our fenceline community, and will aim to protect those who continue to place their trust in the Company.

We continue to maintain a robust approach to asset integrity, which we manage through our Asset Integrity Management System (AIMS). Our AIMS programme focuses on reducing risk through the implementation of projects which improve safety and reliability.

We have a world class risk-based inspection programme, which ensures our equipment is in good condition. We also focus on ensuring that our safety critical equipment is well maintained. Additionally, through competency assurance programmes like our Competency Management Assurance System (CMAS), we focus on maintaining the safety of employees performing safety critical roles.

Our focus on process safety was equally robust. We completed work on our new Risk-Based Work Prioritisation System, which went live in 2011. This system will enable us to prioritise work orders more effectively based on assessed risks. Training around this new system was conducted with 450 employees, and we are currently transitioning from the old system. We also completed our 2011 actions from the Safety and Operational Integrity (S&OI) Audit, as well as the Major Hazard Identification (MAHID), Major Accident Risk (MAR) and Hazard and Operability (HAZOP) action plans. By the end of the year, our compliance on Safety Critical Equipment (SCE) moved from less than 25 percent to over 90 percent.

***"We have a responsibility to ensure the safety of our workforce, as well as our fenceline community, and will aim to protect those who continue to place their trust in the company."***

Not only did we safely complete the turnaround activity on Train 4, but we successfully completed all planned activities – both major and minor. We recognise that the key to asset integrity and reliability is a proactive rather than a reactive approach to maintenance, and this paves the way for the Train's uptime going forward. Our maintenance strategy ensures that we consistently deliver production.

I am happy to report that for the second year running, our fleet of 27 GE Frame 5 turbine compressors – the largest such fleet in the world – was recognised as being the most reliable fleet globally. In 2011, our reliability rate stood at 99.5% – truly representative of our world-class capability. We are now considered by GE as their reference site among all their sites around the world.

#### **AIMING TO BE EVEN BETTER**

Our success at project delivery, our unwavering pursuit of safety, the innovative spirit of our people and our pursuit of

continuous improvement clearly show that we are moving in the right direction. Atlantic's global reputation and our position as the "Trinidad Model" of gas operations provide a framework through which we can identify opportunities for improvement and growth.

The sustainability of our business is based on our ability to be consistent in our approach to our operations. We fully recognise that there is no room for complacency and we will continue to champion efforts to improve our operating performance and competitive position. We will do this by tapping into the potential of our people and ensuring that they have an environment which fosters creativity. Our commitment to safety is one which we will in no way ever compromise, and we will continue to protect the welfare of our employees, contractors and communities.

I am appreciative of the efforts made in the past year to help Atlantic deliver on its responsibilities, and I expect that in 2012 the company will continue to deliver on its commitments.

If we get these areas right, then I am positive that Atlantic will continue to chart a course that differentiates us from competitors in the global industry. I am confident in our people and our approach to sustainable and safe operations, and appreciate all the efforts aimed at continuing to deliver value to our shareholders, our employees and contractors, and the country.

**Jean Andre Celestain**  
**Chief Operating Officer**

# Organisational Profile

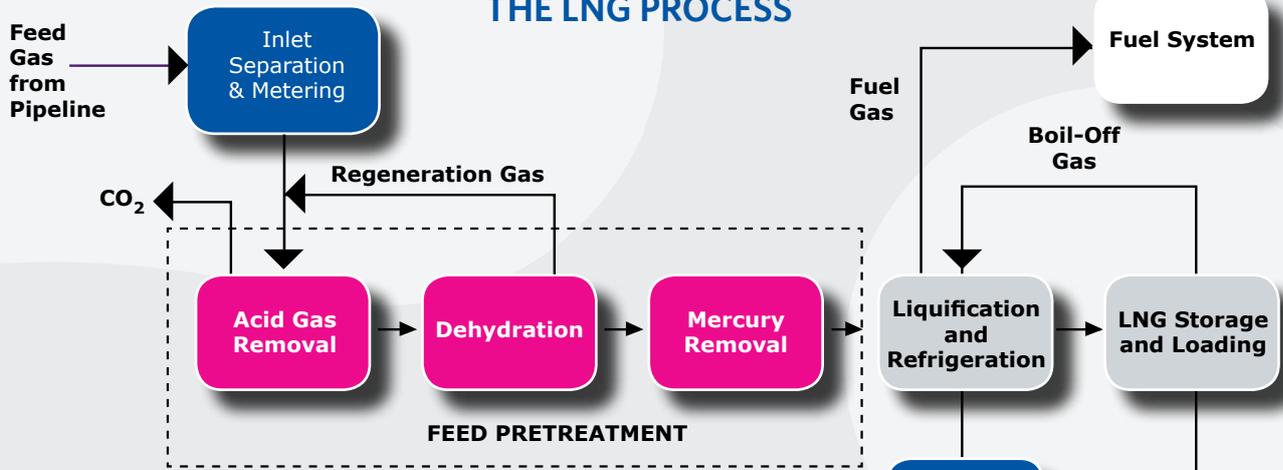


**Atlantic LNG Company of Trinidad and Tobago (Atlantic or Company) produces liquefied natural gas (LNG) from natural gas delivered from fields in and around Trinidad and Tobago. Atlantic is the operator of a four-train liquefaction facility (Facility), located at Point Fortin, on the southwest coast of Trinidad. LNG is exported in LNG tankers from the jetties located at the Facility.**



*The LNG-producing Facility operated by Atlantic occupies 83 hectares at Point Fortin*

### THE LNG PROCESS



The four trains use the Phillips Optimised Cascade Process which cools natural gas using refrigerants until it liquefies at atmospheric pressure. In the process, water and contaminants are removed. LNG (at approximately -161° Celsius) is stored on the Facility in cryogenic tanks. It is piped along one of two 700-metre jetties to ships equipped with cryogenic tanks.

Altogether, the Facility is capable of producing up to 100,000 cubic metres of LNG per day. LNG is shipped on LNG tankers to various destinations, including the USA, Europe, South America, China and Japan, as shown on the map below. In addition to LNG, the plant produces natural gas liquids (NGLs) which are delivered to a third party under separate arrangements.



- |              |                       |                 |                                      |
|--------------|-----------------------|-----------------|--------------------------------------|
| 1. Argentina | 6. China              | 11. Japan       | 16. UK                               |
| 2. Belgium   | 7. Dominican Republic | 12. Netherlands | 17. Taiwan                           |
| 3. Brazil    | 8. France             | 13. Puerto Rico | 18. USA - Boston, Louisiana, Georgia |
| 4. Canada    | 9. India              | 14. South Korea |                                      |
| 5. Chile     | 10. Italy             | 15. Spain       |                                      |

# Atlantic LNG Company of Trinidad and Tobago

## Organisational Profile



*Our Port of Spain office located at Princes Court*

In addition to the Facility site, Atlantic has offices located at Point Fortin and Port of Spain. In 2011, Atlantic's employees numbered 614 persons on a permanent basis and 84 on direct contracts (fixed term, temporary, secondee, or trainee). Of the total workforce, 70 percent work at the Point Fortin locations and the remainder in the Company's offices in

Port of Spain. Thirty percent of the Company's workforce is female. There were 48 new hires in 2011.

Atlantic continues to pursue objectives which optimise production, develop people, demonstrate sustainability and create value for all stakeholders.



*Our Administration Building in Point Fortin*

# About this Report



**This is the eighth Sustainability Report published by Atlantic. We use this publication to record our achievements against our Sustainability Action Plan. It includes achievements against plan for the year January 1 to December 31, 2011 and is structured along the guidelines of the Global Reporting Initiative (GRI).**

### *Our Point Fortin's Finest scholars*

As in previous years, this report covers the objectives and activities of the Company's operation of the four LNG processing trains located in Point Fortin in southwest Trinidad. Atlantic's business is exclusively that of a processor of natural gas and excludes exploration, distribution or shipping. This report therefore does not cover the performance of the suppliers of natural gas, nor the customers who take LNG, nor the activities of natural gas exploration, pipeline delivery, shipping or distribution to markets.

This is a report of the Company's performance against our declared strategies and targets identified for 2011, and is not a statement of the financial performance of the Company.

# About this Report

The indicators of the report against GRI form an index at the back of the publication.

The Company's strategy for successful operations is organised along three main areas of focus.

The first depends on the people of Atlantic – the competence, initiative and responsibility of the human resource driving all activity and performance in the Company. Employees, service providers, suppliers and contractors, business partners and community groups all contribute to a greater or lesser extent to Atlantic's success and must be engaged.

Next, all material indicators such as production, efficiency, maintenance of assets and equipment, cost and value creation, safety and security are considered in evaluating the success of the business.

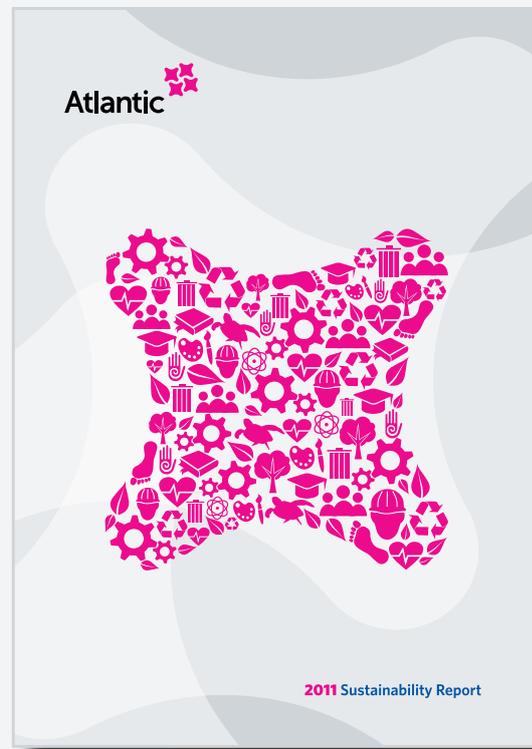
Finally, relationships with all stakeholders, governance, environmental effects as well as social investments and contributions are considered as they impact our "licence to operate" and our commitment to future generations.

## **PUBLICATION OF THE REPORT**

The report is available as an electronic document on the Atlantic website at [www.atlanticlng.com](http://www.atlanticlng.com), or on CD by request. A limited number of copies are printed.

## **ASSESSMENTS AND FEEDBACK**

All management processes in Atlantic include a system that seeks feedback and incorporates stakeholder views and comments into a continuous improvement cycle. Each Sustainability Report is distributed to a wide cross-section of stakeholders. Formal focus group sessions are convened to ensure that the report has been read, is understood and comments are collected to inform the succeeding year's report.



## **FEEDBACK ON SUSTAINABILITY REPORT**

Review of the 2010 Sustainability Report with focus groups provided suggestions for improvement which have been considered and most have been included in the preparation of this report. In addition to suggestions to improve the readability of the report were:

- The provision of more information on shortfalls and drawbacks, the environment and sustainability, as well as action plans indicating how the Company will deal with these areas.
- The provision of more detail about community efforts, and information on financial assistance.
- The inclusion of testimonials and a glossary.

## **STRATEGIC OBJECTIVES AND BENCHMARK SURVEY**

In 2011 the Company's strategic objectives were defined in specific areas:

- HSE and Asset Integrity

- Production
- Cost Management and Value Creation
- People
- Corporate Responsibility

An annual benchmarking study undertaken over several years and currently being performed by Phillip Townsend Associates Incorporated (a US-based company) provides a comparative review of the performance of Atlantic against nine other LNG plants in Health and Safety, Environment, Production and Energy, Personnel, Operating Costs, Asset Management, and Availability and Utilisation. The results of this survey will be used to identify the gaps on which Atlantic will focus in order to drive our overall objective of becoming the Benchmark LNG Operator.

The key findings from the Benchmarking studies conducted to date may be summarised as follows:

### Health, Safety and the Environment

Atlantic has exhibited continued good performance in personal health and safety, but there is always room for improvement. Increased focus on process safety has reduced process risks. Gradual development and implementation of environmental initiatives have enabled a clearer focus on the areas required for improvement.

### Production and Energy

Atlantic has continued to strive for efficiency in the energy used for production. There has been an improvement in availability and utilisation.

### Personnel

Atlantic is continuing to focus on effective and efficient personnel management in order to maximise productivity.

### Operating Costs

Atlantic has improved unit operating costs through continued focus on cost management.

### Asset Management

Atlantic has improved the management of maintenance systems and associated costs and anticipates that this will get better in the future.

## SUSTAINABILITY REVIEW

BSD Consulting, a Brazilian-based international consultancy in sustainable development, facilitated the third self-assessment against Ethos Indicators in May 2011. Recommendations and opportunities for development are included in this report. These are summarised as follows:

- Atlantic has shown progress in understanding sustainability in the daily management and the culture of the organisation.
- Operating units responsible for each of the areas addressed by Ethos recognise room for continuous improvement and have identified gaps.

## ASSURANCE STATEMENT

Atlantic engages an independent professional to provide assurance on each Sustainability Report. In 2011, CSR Solutions, a Trinidad and Tobago firm, was engaged to provide assurance on the 2010 report. CSR Solutions is also providing assurance for this report.

The Assurer is expected to provide context and identify changes year on year from the previous report. The following recommendation was made by the Assurer at the end of the 2010 report:

**“There is still a need for more integration of internal stakeholders into the reporting process and alignment with the strategic aims of Operational Excellence, Capability Growth and Sustainability. ...Atlantic has shown advancement in relation to social dimensions but needs to strengthen the reporting on environmental performance.”**



# Who We Are How We Do Business

## LEADERSHIP STRUCTURE



## BROAD PRINCIPLES

Atlantic's Aspiration recognises a responsibility to optimise available resources for the benefit of future generations and to lead by demonstrating corporate sustainability at the national and local community levels, through activities such as:

- Responsible environmental stewardship
- Building capacity through education in the local community
- Enabling and using our employees as agents of change
- Developing the supply chain
- Building strong partnerships

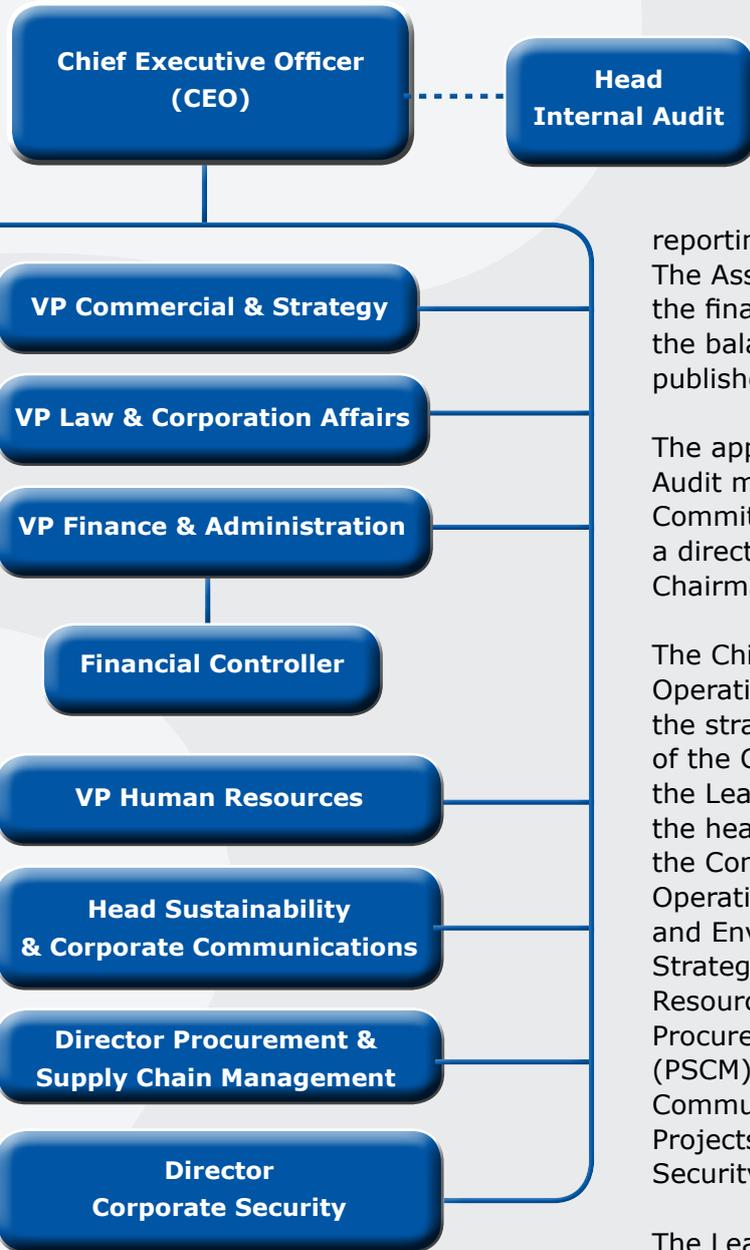
Our Sustainability Commitment obliges us to engage with our stakeholders, to be accountable to our shareholders and to communicate our activities and progress. Such engagement provides the opportunities to determine specific actions towards sustainable relationships.

## THE BOARD AND LEADERSHIP TEAM

At the start of 2011 Atlantic's owners were affiliates of international energy companies – BP, BG, Repsol and GDF Suez – and the National Gas Company of Trinidad and Tobago which represents the interest of the Government. Before the end of the year, the ownership interest of GDF Suez was transferred to Summer Soca LNG Liquefaction S.A. Atlantic's ultimate owners have ownership interests in different percentages in three holding companies which in turn own the four liquefaction trains. Atlantic, the owner of Train 1, operates the trains on behalf of the ultimate owners. Atlantic's Board is comprised of two directors (the Chief Executive Officer and the Chairman) and two alternates (the Chief Operating Officer and the Vice-President, Finance and Administration).

The Chairman holds a non-executive position on the Board.

The Assurance Committee is a sub-committee of Atlantic 1 Holdings LLC and is charged with assisting the Atlantic shareholder, with responsibility for



the review of the effectiveness of the Company's internal controls. These include the evaluation and assessment of issues and processes related to ethics, compliance with policies and procedures, corporate governance, risk identification and management. Additionally the committee evaluates and assesses the effectiveness of the internal audit function, the independent audit process including recommending the appointment and assessing the performance of the external auditor, the Company's process for monitoring compliance with laws and regulations affecting financial

reporting and our code of business conduct. The Assurance Committee also oversees the financial reporting process to ensure the balance, transparency and integrity of published financial information.

The appointment of the Head of Internal Audit must be approved by the Assurance Committee. The Head Internal Audit has a direct reporting relationship to the Chairman of the Assurance Committee.

The Chief Executive Officer and Chief Operating Officer are responsible for the strategic direction and operations of the Company. They are supported by the Leadership Team which comprises the heads of each business unit across the Company: Production, Engineering, Operations Excellence; Health, Safety and Environment (HSE), Commercial and Strategy, Law and Corporate Affairs, Human Resources, Finance and Administration, Procurement and Supply Chain Management (PSCM), Sustainability and Corporate Communications (SCC), Turnarounds and Projects, Internal Audit and Corporate Security.

The Leadership Team meets once per month to review and report on performance, to discuss progress against the strategic priorities of the organisation, and to ratify amendments and changes in direction.

The Management Team is made up of the next supervisory level reporting directly to heads of departments represented on the Leadership Team. This team meets periodically for the purpose of reviewing progress against the annual targets and sharing information to be disseminated throughout the organisation. It also functions as a focus group for new policies and initiatives.



# Who We Are How We Do Business

## GOVERNANCE APPROACH

Governance is achieved through an integrated system of corporate policies and procedures which provide guidelines for behaviour and practices. Updates on policies are rolled out to all employees and where applicable to contractors.

In addition to a Code of Ethics and annual declarations of potential conflicts of interest, there are policies that govern sustainability and procurement practices in the workplace.

## Atlantic's ABC Programme

### ABC Documents and Tools

#### • Policies

- Code of Ethics
- Anti-Bribery & Corruption Policy

#### • Procedures

- Bribery & Corruption Risk Management Standard

#### Implementation

- Roles and Responsibilities
- HR Practices
- Training
- Communications - Internal, External
- Business Relationships
- Guidance
- Reporting and Investigation
- Monitoring and Review
- Due Diligence Standard

#### • Tools

- Conflict of Interest Declaration Form
- Gift and Entertainment Registry
- Speak Out/Report It
- Fraud Risk Register
- Public Official Register
- Fraud, Bribery & Corruption Register

## ANTI-BRIBERY AND CORRUPTION PROGRAMME

In 2011, Atlantic developed and began the implementation of our Anti-Bribery and Corruption (ABC) Programme, consolidating our efforts to protect against fraud, bribery and corruption. The system, policies and expected practices are shown in the diagram on this page.

The objective of the programme is to reduce and where possible, eliminate fraud, bribery and corruption within the Company's operations. The development of the programme demonstrates Atlantic's commitment to countering fraud, bribery and corruption. Part of the programme focuses on ensuring that all employees understand the implications and consequences of fraudulent practices. Procedures for carrying out due diligence checks have also been instituted.

Atlantic's Compliance Unit monitors the implementation and development of the ABC Programme, with internal reviews and assessments conducted by the Leadership Team and external reviews and assessments conducted by members of the Assurance Committee and Atlantic's external auditors.

The new ABC Policy and Due Diligence Standard were developed and rolled out to staff in 2011. Relevant policies and procedures have been amended to ensure alignment with these new documents. Atlantic continues in 2012 to embed the elements of the ABC Programme across all business operations.

## BUSINESS PRINCIPLES AND CODE OF ETHICS

The Atlantic Business Principles and Code of Ethics are integral to the ABC Programme. The Business Principles embody a commitment to comply with all applicable



*We use our Suppliers Forum to engage suppliers and contractors on our safety programmes*

legal requirements and the Code of Ethics sets the ethical standards expected from employees, board members and officers in the performance of their respective functions. These documents embody the Company's commitment to strong legal and ethical standards of business conduct. The Code is supported by three tools, namely:

- Speak Out! (online, dropbox or hotline) where employees are able to report concerns, breaches or potential breaches of the Code
- Gifts and Entertainment Registry which serves as the register of all forms of gifts and entertainment given to and received by employees
- Conflict of Interest Declaration Form where employees are required to declare all conflicts of interest at a minimum annually and as may arise.

In 2011, we began a review of our Code of Ethics with a view to aligning it with the provisions of the new Anti-Bribery and Corruption Policy and providing for new situations and changes in law. The revision is expected to be completed by the second quarter of 2012 and all changes are

targeted to be communicated by the end of 2012.

The Code of Ethics is supported by operational policies including but not limited to the following which were signed or updated in 2011:

- Employment of Persons with HIV/AIDS
- Employment of Young Persons
- Volunteerism Policy
- Equal Opportunity Policy
- Donations Policy
- Recruitment and Selection Policy
- Anti-Bribery and Corruption Policy
- Disciplinary Procedure
- Due Diligence Standard
- Bribery and Risk Management Standard
- Sponsorship Policy

### **SUPPLIER CODE**

We are in the process of finalising a code governing our relationships with Business Partners under the following headings:

- Labour Practices and Human Rights
- Health, Safety and Security
- Environmental Management
- Energy Efficiency and Consumption
- Materials and Water



## Who We Are How We Do Business

- Community Engagement and Social Investment
- Quality
- Local Sourcing, Hiring and Promotion
- Corporate Governance
- Corruption
- Transparency
- Information Management Protection and Anonymous Complaints
- Economic Performance
- Supply Chain Management System

In 2011, further consultations through focus group sessions were held with suppliers and contractors towards a final draft for the code with a view to implementing on a phased basis.

### INTERNAL AUDIT

Internal Audit is mandated by the Assurance Committee to provide independent objective assurance and consulting services designed to add value and improve Atlantic's operations through:

**Assurance activities:** Providing independent objective assessments on whether the risk management, internal controls and governance structures and processes implemented are designed properly and operating effectively.

**Consultancy activities:** Providing advice on potential improvements to enhance corporate governance, risk management and internal control structures and processes of the Atlantic companies.

Internal Audit performs audits on all aspects of the Company's operations including Financial, Operational, Safety, Environmental and Information Technology audits. In 2011, Internal Audit conducted Assurance engagements in Security, Human Resources, Marine Facilities, ISO 14001 Environment Management Systems (EMS),

Contract Compliance Reviews of Suppliers and the Occupational Safety and Health (OSH) Act Compliance.

Contract compliance reviews of partners in sustainability programmes may also be conducted once per year.

### PERFORMANCE MANAGEMENT

Every year, corporate targets are established in an annual Corporate Performance Contract. The targets are cascaded from the Chief Executive Officer to his direct reports and throughout the organisation via individual performance contracts.

A scorecard on these performance targets is prepared for review by the Leadership Team on a monthly basis to assess performance and identify relevant gap closure initiatives. At the end of the year there is an evaluation of actual performance relative to the plan with any lessons learned being carried forward.

### RISK MANAGEMENT SYSTEM

The risk management system involves risk identification, assessment, mitigation, prioritisation and monitoring at each department's level in the organisation. Risks with potential for far-reaching impacts are escalated to form part of the organisation's risk register.

The system has evolved into an ongoing, multi-tiered, integrated process used by Atlantic to ensure that contingencies are in place to minimise negative impacts and maximise opportunities.

The system is owned by the Chief Executive Officer who reports risks to the Assurance Committee.



**Total man-hours worked rose significantly from 3 million in 2010 to 4.9 million in 2011. This reflected not only input by more persons, but also different skill sets and complex simultaneous and overlapping projects.**



# Sustainability at Atlantic





**Sustainability is a guiding principle that supports Atlantic's mission to be a leader in the global LNG industry and refers to our intention to create long-term value for the Company and shareholders, as well as for employees, communities and Trinidad and Tobago.**

**The ultimate owners have supported Atlantic's declared commitments and initiatives to sustainability.**

## MANAGEMENT APPROACH AND KEY PERFORMANCE INDICATORS

Atlantic continues to report on performance against three strategic objectives – Operational Excellence; Capability Growth; and Sustainability. Personal and process safety, environmental impact, employee satisfaction and meeting the expectations of all stakeholders (shareholders, employees and community primarily), values, transparency and ethical behaviour continue to be important considerations of how we do business.

As in previous years, the 2011 corporate performance contract included targets for:

- Cost and Value Creation
- Sustainability
- Personal and Process Safety
- Production and Optimisation
- People

## 2011 PERFORMANCE

In 2011 success was achieved through plans executed with resolute attention to balancing multiple and complex tasks. As a mature organisation, achievement of the corporate targets was based on safety, asset integrity, careful financial considerations, people development and the ongoing commitment to sustainability.

There were distinct challenges to revenue that included challenges in local gas supply. The total number of man-hours recorded in the year was increased by 66 percent to achieve the largest turnaround in the world on an LNG train. Major maintenance works planned and completed for the year saw almost 2,000 contractors at work on the Facility during 2011. Total man-hours worked rose significantly from 3 million in 2010 to 4.9 million in 2011. This reflected not only input by more persons, but also different skill sets and complex simultaneous and overlapping projects. Safety considerations were non-negotiable.

Greater pressures were therefore placed on cost and capital. As a learning organisation dedicated to continuous improvement, significant strides were made in reducing risk and setting up the Facility and the business for continued success over the long term.

During 2011, Atlantic reached 14 million man-hours without a Lost Time Injury (LTI). All shutdowns or maintenance work on the Facility were delivered safely, on time and full scope. Major and minor jobs were completed safely and reliably. The implementation of the Asset Integrity Management System (AIMS) plan for 2011 was achieved ahead of target and the online system for permitting was introduced and tested before the end of the year. The new online system is expected to be functional in 2012.

Innovation and world class milestones also defined 2011. Among other improvements, Atlantic has set a new world record among gas plants for Frame 5 Gas Turbine reliability of 99.5%. Defrosts on the trains have been reduced from a maximum of 7-8 days to one day. The Operations teams continue to work towards efficiencies on major and smaller aspects of the processes.

Based on the Company's success as a global business it is able to support and inspire sustainability and corporate responsibility. In key areas of corporate sustainability, Atlantic is on par with top companies in the Latin America group, as assessed by the independent consultant on Ethos Indicators, BSD Consulting. Benchmark areas on which we performed well are Values, Transparency and Governance, Community and Suppliers.

In summary, the challenges of reduced revenue – coupled with increased cost and increased capital burden – were met by management tactics to ensure that cash flow and business viability remained strong. Reductions in volumes of gas processed were mitigated by exploring opportunities to optimise value and maximise income.

## Creating Value as the Sole Supplier of LNG in the Atlantic Basin



**As the only LNG processing facility in the Atlantic Basin the Company makes every effort to optimise shareholder value, to contribute significantly to Government revenues, to contribute to the economic development of Point Fortin through the use of local services and social investment, and to be the employer of choice for employees and service contractors.**

*Our Seeds of Hope Programme helps to create a greener tomorrow*

The Company aspires to conduct business in a manner that advances understanding of the principles of sustainability and most especially by example through minimising cost and optimising value creation.

In 2011, Atlantic paid a cumulative sum in excess of US\$200 million in taxes (including business and green fund levies, and corporation taxes). Of this amount, income tax remitted on behalf of employees amounted to US\$12 million. As a further indicator of the contribution to the economy, in 2011 Atlantic spent US\$90 million for local services (not including construction of the administration building in Point Fortin).

The Company's total throughput of LNG reached 790 Trillion British Thermal Units (Tbtu) in 2011.

These volumes left Point Fortin in 248 shipments, with the most significant quantities going to the USA, Argentina and Spain. See map on page 11.

## Fostering Sustainability Across the Supply Chain

*Atlantic has placed significant focus on strengthening the relationship with suppliers. Through a robust engagement strategy, which includes regular face-to-face interaction, strategic management interventions and capacity building through certification, we are creating mutual benefit and long-term business value.*

Atlantic is committed to contributing to the long-term development of small contractors and suppliers, thereby fulfilling our overarching commitments to sustainability, capability growth and value creation in the industry sector.

Our Contractor Management Programme (CMP) was established to provide assurance around contractor performance and mutually agreed expectations and goals. This is done through a series of initiatives such as Performance Management Meetings, pre-qualification audits with feedback and coaching sessions and contractor KPI monitoring, especially around high risk activities.

One of the initiatives which continued in 2011 was the bi-monthly Business and Safety Meeting which fosters communication and a culture of consultation and feedback with the supplier network. These meetings have developed into an excellent forum for the sharing of best practice and innovative solutions for improving our business partnerships.

Atlantic became the first operator in the local oil and gas sector to achieve Safe-To-Work (STOW) certification. Based on a commitment to lead the way for STOW certification along the supply chain, a STOW exhibition was hosted in July 2011. This allowed service providers who had already achieved STOW certification to share their experiences and milestones from the certification process, as well as help smaller suppliers understand the benefits which STOW certification would bring to their business. We have now implemented the STOW certification as part of our pre-qualification process, to encourage a greater focus on safety processes and positive safety behaviours.

Atlantic's Code of Ethics governs our behaviour and practices, and we have gone a step further to develop a Code specific to the supply chain, which sets out guidelines for ethical standards of business conduct. The elements of the Sourcing Code were rolled out during 2011 and the feedback helped us to identify opportunities and potential challenges for implementation across the entire supply chain. The pilot programme will begin in 2012, during which time we will work closely with suppliers to build their capacity in order to meet all the elements of the Code.

During our turnaround activities, we continue to depend heavily on the support of hundreds of contractors, and a creditable safety performance is the direct result of this deep and sustained engagement with service providers. Additionally, we took extraordinary measures around Fit-For-Work certification for all our service providers, investing significantly in medical examinations to provide assurance during the Turnaround.

Our commitment to ensuring the health and safety of all our personnel is another testament to our sustainable approach to managing our contractor workforce.

## Managing Sustainability



**The Sustainability Management System is a consolidation of the processes to manage sustainability issues and ensure that our sustainability goals and objectives are achieved.**

The Sustainability Management System addresses the environmental, social and economic impact of Atlantic's activities, both immediate and in the long term.

It also provides for consistency in the allocation of resources and the assignment of responsibilities as it relates to our employees and stakeholders. Furthermore, it provides for ongoing evaluation of practices, procedures and processes.

## COMMITMENT TO SUSTAINABILITY

Atlantic has a clearly defined Sustainability Commitment which provides a guiding vision, and which ensures that our activities and services are in close alignment to our Aspiration. Sustainability refers to the intention to create long-term value for Atlantic, our shareholders, as well as employees, communities and the nation. At the practical level, sustainability actions are developed to build capability within the Company as well as with stakeholders and include social investment programmes, environmental initiatives and ethical conduct and good governance.

The Sustainability Commitment is the basis of engagement with all stakeholders, including shareholders, employees, suppliers, contractors, business partners, and communities and forms the basis of accountability and evaluation of performance against targets.

We deliver our actions based on the areas of our commitment (employees, environment, community, suppliers) through direct investment, partnership or positive influence. Our plan for sustainability is reviewed and revised every two years.

## SUSTAINABILITY PROGRAMME

Our sustainability programme was developed to drive our ongoing commitment to lead sustainability in our local community and in the country and facilitates the identification of opportunities, as well as the mitigation of any risks. Our strategic approach is guided by the five areas outlined in our Sustainability Commitment and by the A-Quad Strategy.

(The Quad is the symbol that forms part of Atlantic's logo.)

**Our A-Quad strategy provides a visible and strategic guide to our decision-making around our investments in the community, and comprises four strategic areas:**

**Ability** – Building physical and/or mental abilities that promote strength and wellness

**Advancement** – Creating opportunities for growth by strengthening skill and knowledge

**Agility** – Fostering nimbleness and responsiveness required to meet the challenges of the future

**Advocacy** – Championing the interests of those to come

Atlantic has clearly defined roles and responsibilities embedded in a sustainability governance framework which enables consistency, transparency and ethical conduct in decision-making. It also facilitates our ability to effectively evaluate new proposals, ensuring their alignment to our strategy as outlined by the five areas of our Sustainability Commitment. Additionally, it enables us to evaluate our performance against targets, business principles and promises.



*The Atlantic Real Madrid Foundation Social Sports School uses the game of football as a catalyst for development*

## SUSTAINABILITY COMMITTEE

Atlantic's Sustainability Committee is accountable for our sustainability programme. The Sustainability Committee provides leadership and oversight over strategy and policy and has responsibility for the evaluation and approval of new proposals for sustainability initiatives, the management of compliance with Atlantic's Business Principles and governance mechanisms and the review of sustainability performance. The Sustainability Committee is governed by the Sustainability Committee Terms of Reference.

Based on the approval of the Sustainability Committee, the project is governed by a formal contract with clear specifications

of the roles and obligations of the partner (NGO or organisation) and Atlantic, budget and disbursement schedule, expectations (such as safety, ethical and environmental considerations) and deliverables.

One of the programmes contracted in 2011 is the Atlantic Real Madrid Foundation Social Sports School. The Real Madrid Foundation (the arm of Real Madrid that manages the club's corporate responsibility) joined Atlantic in establishing and managing a social programme in Trinidad based on the philosophy that children in at-risk communities can find focus in their lives through football and social coaching. The social school is housed at the St Dominic's School in Belmont and attracts participation from the Port of Spain area. The Ron La Forest Soccer Academy coordinates the programme on Atlantic's behalf. Approximately 80 boys and girls were registered for the first year.

# Sustainability at Atlantic



*Point Fortin's Finest is Atlantic's longest running programme and supports the best SEA students in the community*

Our longest running sustainability programme is Point Fortin's Finest. Each year the top 10 students from Point Fortin entering secondary school are added to the honour roll of Point Fortin's Finest. Thereafter, they are beneficiaries of annual grants – through secondary school to the attainment of a first university degree. In effect since 2000, the honour roll of the Point Fortin's Finest at the end of 2011 was 106. Of these, 71 are still in secondary school, 35 in university, and 19 have graduated from university, among them engineers and doctors who are expected to make a commitment to contribute to the development of Point Fortin.

## **SPONSORSHIP**

Sponsorships are intended to assist projects across the country, and to influence the wider society.

The Sponsorship Committee, governed by the Sponsorship Policy, considers and approves strategic partnerships that align



*Atlantic is leveraging its global partnerships with clubs such as Manchester United to develop the talent of children across Trinidad and Tobago*

with Atlantic's brand values and corporate governance mechanisms.

Atlantic continues to sponsor sport and youth development at the national primary school level through the support of the



*Atlantic's Ultimate Field Trip at IMAX provides an innovative way of teaching children*

National Primary Schools' Football League, the National Primary Schools' Cricket League and the National Primary Schools' Track and Field Championships. These programmes provide opportunities for both boys and girls across Trinidad and Tobago to hone their physical talents and serve as gateways to senior leagues.

In 2011, through our partnership with Giant Screen Entertainment Limited, Atlantic became the official sole educational sponsor facilitating the release of educational documentaries filmed in state-of-the-art IMAX 3D technology as part of the theatre's film schedule. Atlantic's support also provides assistance for school visits by students and their teachers. Students from across the country, including areas such as Manzanilla, Cumuto, Carenage and Tobago, have already participated in this educational experience.

## **DONATIONS AND OTHER CONTRIBUTIONS**

Atlantic receives numerous requests for assistance on behalf of individuals, groups and organisations for a wide variety of reasons. Requests are assessed using our Due Diligence Standard before being considered. Criteria for assessment include whether the beneficiaries are children, individuals or groups and the nature of the need – education, illness, matching funds in support of community or self-help programmes, etc. The Donations Committee considers requests for donations/contributions in line with the Donations Guidelines, which are aligned to our Business Principles and corporate governance mechanisms. The Donations Committee and the Donations Sub-Committee are governed by a Donations Committee Terms of Reference.

## A Partnership to Nurture Young Men “At Risk”

*Against the backdrop of escalating homicide rates in Trinidad and Tobago, Atlantic partnered with bpTT and BG T&T on a social intervention programme aimed at addressing important issues such as male exclusion, and the growing negativity and violence among our young people.*

In recent years, the rate of violent crimes across Trinidad and Tobago has been increasing, including year-on-year increases in the number of homicides. The collateral damage to families has the capability to severely mar young lives – especially boys’ – and affect the future stability of Trinidad and Tobago.

The Boys’ Nature Nurture Camp (BNNC) – an initiative of Franklyn Dolly and Associates – was perceived as an opportunity to have a positive influence on the lives of boys affected by violence, while modelling an intervention that could be usefully replicated in the wider society. Along with energy partners bpTT and BG T&T, Atlantic committed to funding the programme for three years.

The BNNC caters for 20 boys between the ages of eight and 12. The objective is to assist them in expressing their feelings of grief and anger associated with the trauma of a relative’s murder. The programme takes the form of a two-week live-in camp, where the boys are counselled by trained professionals,

and have the chance to respond to nurturing relationships with counsellors and mentors. They also participate in activities such as cricket, golf, hikes and field trips.

In 2011, 19 boys participated in the programme, having been sourced through the Ministry of Education’s Student Support Services Unit, as well as the Ministry of National Security’s Citizen Security Programme. Each participant undergoes a full psychological assessment, and the results are shared with both Ministries to facilitate follow-up and monitoring in schools and communities once the camp is over. This ensures that the boys’ progress and emotional rehabilitation continue, sustained by long-term support systems in the two Ministries.

It is expected that after the two-week camp, the boys begin to recognise that there are positive alternatives available to them, other than violence or gang-related activities. By engaging the boys early in their development, through in-depth counselling sessions, the mentorship programme and the extra-curricular activities, the BNNC provides avenues to channel negative energy in a socially constructive manner.

By including parents and relatives in the programme, local communities are being empowered to be their own champions for positive change and are equipped with the skills required to mitigate the negative consequences of violent crimes.

The success of this partnership was highlighted when the Energy Chamber awarded the partners the Social Investment Prize at the annual Corporate Social Responsibility (CSR) Awards in early 2012, recognising our efforts from 2009-2011 in developing a sustainable framework to help communities recognise and address their needs.

## Commitments to External Initiatives



*Recognising environmental stewardship*

**In keeping with our commitment to social responsibility we have adopted certain external standards and certification.**

### **ISO 14001**

ISO 14001 is an internationally accepted certification which establishes standards for an Environmental Management System (EMS). Among other things, it specifies the requirements for developing an environmental policy, facilitates the identification of business aspects which impact the environment and takes into account the legal requirements relevant to our activities. The EMS facilitates the development of environmental objectives for improvement, as well as a management programme aimed at achieving these objectives, with regular reviews and continuous improvement. Atlantic has been certified since 2001 and undergoes external surveillance audits annually, with re-certification every three years.



*Our Suppliers' Forum provides an opportunity for suppliers to ask questions about initiatives such as Safe-To-Work (STOW)*

### **SAFE-TO-WORK (STOW)**

The Safe-To-Work (STOW) initiative is a joint effort of the Energy Chamber, the Association of Upstream Operators of Trinidad and Tobago (AUOTT) and the Point Lisas Energy Association (PLEA) to develop consistent health, safety and environmental (HSE) requirements to prequalify contractors in the energy sector. STOW involves components representing a body of procedures, policies and work practices which when implemented equip the organisation to deliver excellent safety performance. It enables the company to operate according to rigorous international best practices, while at the same time embedding a culture of safety among the employee and contractor base.

Ensuring that suppliers are STOW certified is part of our commitment to their development.

### **BUSINESS ASSOCIATIONS**

Atlantic is involved in major national industry associations and has a proactive role in the development of best practice

and policies in areas of concern to the energy industry that are consistent with a sustainability-based perspective. Atlantic actively participates in the following associations:

- The Energy Chamber
- Trinidad and Tobago Chamber of Industry and Commerce
- American Chamber of Commerce of Trinidad and Tobago
- Point Fortin South Western Chamber of Industry and Commerce
- Point Lisas Energy Association

### **STAKEHOLDER ENGAGEMENT**

Atlantic aspires to create opportunities for present and future generations, but we can only do so if we understand the needs and concerns of the stakeholders of the present day. Stakeholder engagement facilitates understanding and offers the opportunity to listen and respond to those who have an interest in Atlantic, or are impacted by our operations. Our aim is to ensure that we are accessible, transparent and responsive to stakeholder concerns and that we foster relationships that are mutually beneficial.

## KEY STAKEHOLDER GROUPS

### Shareholders

We depend on our shareholders' investment for growth and development. We also depend on their confidence in our strategic management approach and long-term business strategy. We can do this by creating long-term shareholder value through high performance delivery against our targets, as well as ensuring we operate within a high quality governance framework.

### Employees

Our employees are the driving force of the business and so we depend on them to deliver our strategic aims and objectives in keeping with our Aspiration. We are committed to ensuring their health and safety as well as providing opportunities for their long-term career development.



*Health and Wellness activities are held throughout the year to support employees' well-being*

### Government and Regulators

We operate in an industry which is highly regulated and we are compliant with national policies and regulations which govern the sector.

### Local Communities

By cultivating relationships with the community of Point Fortin and its environs we seek to protect our licence to operate, as well as the well-being of the people and the environment. We have a duty to collaborate with these stakeholders in order to properly manage any social, environmental or economic impact of our operations.

### Suppliers

Our suppliers provide services and invaluable support to our operations. We depend on them to ensure that their operations are aligned to our internal policies and practice, as well as wider national and international standards and policies. We expect the same level of intervention and interaction from them that we expect from our employees.

### Business Partners

Through membership in business associations and chambers, as well as formal and informal interactions, we build close relationships with several business partners on programmes from those in the local community to those in the national interest. We seek to ensure that their business practices are aligned to our business principles, codes of ethics and values.

### Media

The media have the power of influence and we engage the media to ensure that public perception is close to our identity. We seek to ensure that information shared is accurate and balanced.



*CEO Nigel Darlow meets with key stakeholders in our home community of Point Fortin*

## ENGAGEMENT PROCESS

In 2011 we sought to improve our stakeholder engagement by conducting both quantitative and qualitative stakeholder perception surveys across the various external stakeholder groups. These surveys provided valuable insight into how we are perceived externally and identified gaps which need to be addressed in order to improve our communication and relationships with these groups.

Early in 2011 a survey of participants in selected community investment programmes was completed and the results shared with the programme coordinators and internally.

Late in 2011, we conducted a qualitative study with respondents who have an interest in Atlantic or the energy industry. These stakeholders represented a wide cross-section of society, including those with political interest at local or central government level, the media, suppliers, and the community. An independent consultant was assigned to conduct a series of face-

to-face interviews, based on open-ended questions, to gauge external perceptions of Atlantic. The findings of this study identified areas where we can improve in our external stakeholder engagement. While there were no negative perceptions from those interviewed, there is an opportunity to raise Atlantic's profile among our key stakeholders, differentiate ourselves within the energy sector and communicate more about our social investment at both the local and national levels. Going forward there will be a stronger focus on strategic engagement with our external stakeholders, to ensure greater understanding of the Atlantic brand and to support our corporate citizenship.

Internally we ensure employees are engaged through frequent and regular communications. These begin at one-on-one engagement with their supervisors on their performance and any business-related matters. We also invest in face-to-face meetings to roll out new policies and engage them on important issues, such as safety, anti-bribery and corruption and Company performance.

Additionally, employees are kept updated on Company activities and policies via internal communications channels such as our electronic newsletter, the intranet, which also includes department-specific sites, as well as informal surveys, email updates and an internal blog. We also make use of printed materials and digital screens to enhance the other methods of engagement. This consolidated approach allows us to keep employees fully engaged about the business and also provides opportunities for feedback. This was evident in 2011 when we also included employees in a focus group study on the 2010 Sustainability Report and Company's rebranding. The focus group findings enabled us to gauge employee opinions and identified areas for improvement to ensure employees feel more valued and involved in decision-making.



## Case Study

### Engaging Stakeholders to Manage Performance Delivery

*Atlantic embarked upon the ambitious project to construct a new administration centre in Point Fortin and to relocate staff from the plant. This project is part of the plan to reduce risk to life in the unlikely event of a major accident at the plant facility in Point Fortin. Through strategic stakeholder engagement, the project was completed without incident and on schedule – well in advance of industry expectations.*

Based on industry lessons from past events such as the incidents at Texas City Refinery in March 2005, and at Sonatrach Skikida LNG in January 2004, Atlantic took the decision to mitigate its risk of a potential life-threatening incident by relocating all staff deemed not essential to the production activities to another location outside of the plant facility in Point Fortin.

Since time was a critical factor, every effort had to be made to ensure the project was completed on schedule. The project came with its own challenges, not the least of which was the need to conduct multiple activities simultaneously, such as obtaining approvals from many different agencies, and pre- and post-construction activity.

We developed a stakeholder matrix and action plan, and very early on we established lines of communication between Atlantic and local government, relevant regulators and government departments, including the Environmental Management Authority (EMA), the Water and Sewerage Authority (WASA) and the Town and Country Planning Division.

It was also critical that we involve the neighbouring residents early in the process. Residents were given early notification of intended major works, including road closures, the operation of heavy equipment and work after normal business hours. Face-to-face interaction was augmented by the dissemination of printed communication, as well as phone calls, not only to ensure residents were consistently updated, but also to keep channels of communication open for emerging concerns.

Our employees also had their own concerns, among them the impact of the project, including on-site safety and its effect on our corporate performance, as well as anxiety about the level of disruption associated with the move. On site, the project managers implemented Atlantic's Safe-To-Work and Permit to Work processes, as well as our security systems and policies. Additionally, a robust internal communication plan was executed with regular updates aimed at minimising the uncertainty around progress and completion, as well as the logistics of the eventual relocation.

By December 2011, we completed this administration building – approximately 60,000 square feet of office space on two floors. There is also a mixed use building, parking for 306 vehicles, and services to support the expected staff complement on the site. The project also included the construction of a retaining wall along Clifton Crescent, the widening of Hilltop Avenue, the provision of a water supply to Clifton Hill and traffic lights in the area.

The project was completed within 13 months and within budget. Requiring over 500,000 man-hours, within aggressive deadlines, there were relatively few safety incidents and no Lost Time Injuries. The relocation of employees, together with furniture and equipment from the plant to the new administrative facility, was also without incident. More importantly, we managed to address a major risk in the relocation of over 300 persons from the plant facility to a separate location, which is of world class standard and complies with all local legislation.



*The Atlantic 4-H Seeds of Hope programme teaches children to respect their natural environment*



*Atlantic's investment in young people and sport continued in 2011*

## THE POINT FORTIN COMMUNITY

Atlantic is dedicated to the sustainable development of the "home community" under the principle that the home is the nucleus of the nation.

We accept our responsibility to our local community to ensure safe, reliable and efficient operations. The processing facility is located in Point Fortin, a borough of about 30,000 that is an administrative centre for the southwest region of Trinidad. Atlantic has articulated a commitment to develop the capacity of the citizens through exemplary corporate partnerships. Over the years this has given rise to a number of programmes targeting different groups in Point Fortin. These include sporting facilities and activities for children, access to skills training for at-risk groups, scholarships for top academic performers, world-of-work experiences for students and graduates, enterprise training for farmers and a hands-on approach to understanding environmental issues through the 4H Clubs. Based on the experience and feedback from participants on specific programmes, there is a phased approach to develop similar interventions in other parts of the country.

The Point Fortin community has been the focus of the Company's capability development efforts through operator trainee and apprenticeship programmes. Atlantic is also among the leading employers in the southwest peninsula, with over 20 percent of direct employees coming from the community. We also significantly support local service providers and businesses.

Atlantic holds the view that sustainability in the Point Fortin community depends on the capacity of the people to be self-sufficient. Our social investments in Point Fortin are about community development and have focused on primary school children as the niche target group.



*Agriculture is an important focus, both among students and farmers in the community*

### **SOCIAL INVESTMENT FOR DEVELOPMENT OF INDIVIDUALS AND COMMUNITY**

Our programmes have centred on holistic development linking sport and education for the children, and on business training for selected groups. We recognise the need for partnerships to ensure the delivery of our sustainability objectives within the community, and as a result, all programmes are managed by relevant NGO partners or organisations. Atlantic also collaborates with national and international agencies for developmental initiatives, such as the Local Economic Development (LED) Programme which is a partnership between Atlantic and the Inter-American Development Bank (IADB), aimed at facilitating economic development in Point Fortin and its environs.

Sports programmes managed by external entities include "Shape the Community" with the Trinidad and Tobago Olympic Committee (TTOC), cricket with the West Indies Players' Association (WIPA), and swimming at the community pool managed by the YMCA.

The University of Trinidad and Tobago facilitated agricultural enterprise training for farmers again in 2011, while at a junior level, students participated in the Atlantic Seeds of Hope Programme. This programme was developed by the Voluntary Council of the 4H Clubs of St Patrick West (southwest peninsula of Trinidad) and focuses on engaging young people on the importance of environmental conservation, as well as involving them in agriculture and micro-entrepreneurship.

### **GOVERNANCE PROCESS WITH SOCIAL INVESTMENT ENTITIES**

All entities selected to deliver programmes to communities or groups are contracted with specific scopes of work and timelines. These organisations are expected to adhere to Atlantic's Code of Ethics and Business Principles, as well as our Safety and Environmental policies. In order to deepen understanding around Atlantic's values, meetings with social investment entities are held at least once per quarter. In these sessions, safety, environmental and ethical principles are shared, as well as general information about Atlantic. Formal audits may be requested at any time.

## SUSTAINABILITY PROGRAMMES



Successful Servol graduates with Adolescent Development Programme instructor

PROGRAMME	DESCRIPTION	PARTICIPANTS	
		IN 2011	TOTAL
<b>Servol Adolescent Development Programme (ADP)</b>	The Adolescent Development Programme (ADP) facilitated by Servol focuses on skills training for students who leave secondary school without academic passes, thus providing additional opportunities for them to access employment. These skills include Beauty Culture, Computer Literacy and Computer Repairs. ADP graduates are eligible for skills training offered by the NESC in Point Fortin.	ADP - 24 SKILLS - 23	ADP - 156 SKILLS - 68
<b>NESC Skills Training Programme</b>	The National Energy Skills Centre (NESC) facilitates technical and vocational training for young people in Point Fortin. Courses include Welding and Fabrication, Pipe Fitting, Electrical Installation, Plumbing, Small Engine Repairs and more recently Sound Recording and Musical Production. Atlantic's support involves subsidies on tuition and material fees.	1539 (Sept 2010- July 2011) - 17 schools	2290 - 21 schools
<b>UTT Agricultural Enterprise Training</b>	This programme, facilitated by the University of Trinidad and Tobago (UTT), aims to build the capacity of farmers in the southwest region and combines training in traditional farming methods and modern commercial enterprise. The Ministry of Food Production, Land and Marine Affairs also supports this programme.	1619 (1251 Primary, 368 Secondary)	1854 (1476 Primary, 378 Secondary)
<b>4H Seeds of Hope Programme</b>	The 4H clubs in the southwest district of St Patrick West have collaborated with Atlantic and the Ministry of Food Production, Land and Marine Affairs to raise awareness among young people about environmental conservation, biodiversity and agricultural enterprise.	85	503
<b>WIPA in the Community</b>	The West Indies Players' Association (WIPA) partnered with Atlantic to develop young persons through healthy lifestyles and the sport of cricket. The students in and around Point Fortin are exposed to cricket coaching and life skills development, while the community-based coaches have also benefited from training and certification.	667	2443
<b>TTOC Shape the Community</b>	The Trinidad and Tobago Olympic Committee (TTOC) and Atlantic have partnered on this programme which offers children access to training in seven sporting disciplines – swimming, tennis, gymnastics, volleyball, badminton, track and football. The programme also provides for the certification of local coaches.	30	60



## ETHOS INDICATORS

Self-assessment against Ethos Indicators was facilitated by BSD Consulting in May 2011. The findings of their report stated that Atlantic's overall performance decreased to a total of 5.66 points as compared to 6.55 in 2009, mainly because:

- Participants understand sustainability better
- Participants understand the self-assessment process better, and are not only focused on the ranking, but also identify areas for improvement
- Environment is the area with the greatest scope for improvement

The most significant improvement was shown in the areas of Values, Transparency and Governance; Community; and Suppliers.

## ATLANTIC PERFORMANCE AGAINST ETHOS INDICATORS

Area	Atlantic's Performance	Average	Best Performance
Overall Performance	5.66	6.13	6.59
Values, Transparency & Governance	8.38	7.95	8.38
Workforce	4.10	5.03	5.95
Environment	1.77	4.87	7.96
Suppliers	5.68	5.13	5.68
Consumers & Customers	7.50	7.89	8.28
Community	7.26	7.04	7.26
Government & Society	4.94	5.07	5.21

## Environmental Performance



**The Environmental Management System (EMS) is part of the Company's management practice to develop and implement our environmental policy and manage our environmental aspects.**

The potential environmental impacts of the activities at an LNG processing plant include, but are not limited to, effects from the following:

- Emissions of contaminants (e.g. greenhouse gases) to the atmosphere which affect air quality and can contribute to global warming and climate change
- Release of chemicals and effluents causing contamination of land and surface waters and subsequent release to receiving environment onto the land and/or into the water

- Noise and vibration from the infrastructure on neighbouring communities
- Transporting products to and from the facility
- Use of water and/or discharge into water resources and
- Hazardous solid and liquid waste.

### MANAGEMENT APPROACH

Our environmental commitment includes the following principles:

- To be an industry leader in conducting our business responsibly, so as to protect employees, the public and the environment
- To consider environmental factors as an integral part of planning and operating decisions
- To ensure that every employee can contribute to improving the Company's environmental performance and to encourage employees to become stewards of the environment
- To be responsible environmental stewards of all Company-owned properties and natural resources
- To minimise adverse environmental impacts of operations by meeting or surpassing environmental standards, investing in energy efficiency measures, and supporting Company recycling and waste reduction programmes
- To engage with Government, research institutes and sector colleagues to foster the development of effective and responsible environmental laws and regulations and standards based on scientific approaches with the consideration of cost, benefit and minimising risk
- To encourage public participation opportunities and welcome communication from stakeholders on environmental issues and to foster constructive working relationships with environmental organisations, community leaders, media and government agencies

- To work actively towards reduction of emissions and waste
- To continually improve by monitoring compliance with regulations and our internal standards and to strive for performance which positions the Company as an industry leader

During 2011, a vigorous approach to meet the intent of the Environmental Commitment was launched and included advocacy programmes carried out across the organisation to improve understanding and management of issues such as recycling waste, conserving water and energy and climate change.

Atlantic has implemented policies, procedures and continuous improvement practices in areas such as waste management, flaring, improving fuel efficiency, Greenhouse Gases (GHG) tracking and reporting, contractor management and amine liquid waste reduction and recovery. This focus will extend in 2012 to areas such as effluent management, solid waste management, hazardous waste management, life cycle approach, greening the supply chain, water management, spill prevention and management and compliance management.

### Environmentally Responsible Operations

The Environmental Management System (EMS) is part of the Company's management practice to develop and implement our environmental policy and manage our environmental aspects. Atlantic has maintained a certified EMS in accordance with ISO 14001:2004 since 2001. The third and most recent re-certification was conducted in April 2011.

Re-certification was maintained with two minor non-conformances. Nine (9) areas were identified where the EMS may be improved to realise enhanced environmental performance.

In order to ensure Atlantic's EMS continues to conform with the requirements of ISO 14001:2004 standard and that it is properly maintained, Atlantic conducts regular internal audits of the processes at least twice per year, with one surveillance audit per year by an independent accreditation organisation.

Recommendations for improvement were made as follows:

- Develop a statistical approach for determining the significant aspect risk threshold and tracking of average aspects over time
- Ensure that other requirements associated with development agreements, leases, stakeholder interests, community outreach/sustainability activities and corporate data submission are included in the Legal and Other Requirements Register
- Provide additional EMS-related information, including items such as spills prevention/reporting, waste management/disposal, chemical management in the Atlantic Site Safety Standards handout booklet
- Include ballast discharge guidance in Atlantic's Terminal Information and Regulation Manual
- Ensure appropriate ballast exchange occurs during all ship-loading events
- Institute a green purchasing programme
- Provide feedback to contractors who are unsuccessful in tenders and after they have completed projects/contracts
- Track documentation of biological waste disposal according to standard requirements
- Develop additional environmental KPIs

## Compliance Management

An integral aspect of Atlantic's environmental management is compliance with local, regional and international legislative requirements. Atlantic works proactively to ensure that mechanisms are in place to comply with a wide range of current and future environmental regulations that may affect our operations.

## Local Reporting

The nature of Atlantic's operations means that a variety of environmental laws and issues can affect our "licence to operate." To develop key consideration of these issues and our reporting requirements, Atlantic monitors, manages and reports on measurements of ambient air, noise, waste, water, stack emissions, effluent, spills to land and sea.

The Company has been actively engaged in environmental monitoring, a legal requirement of the Certificate of Environmental Clearance (CEC) issued by the Environmental Management Authority for Train 4 construction and operation. Results are compared to the standards contained within the CEC conditions. From the year 2012 stack emission monitoring will include monitoring of Turbine Generators, Heaters, Turbine-driven Compressors and Incineration across all Trains (in accordance with CEC requirements for the modification of Trains 1, 2 and 3).

Here are some of the environmental aspects of our process that are monitored and compared to the standards as laid out in the Certificate of Environmental Clearance (CEC) issued by the Environmental Management Authority (EMA):

ENVIRONMENTAL ASPECT	DESCRIPTION	RESULTS (% Compliance with Environmental Standards as per CEC)
<b>Stack Emissions</b>	At the Train 4 stacks of the Turbine Generators, Heaters and Turbine-driven Compressors, the levels of Total Suspended Particulates, Carbon Monoxide, Volatile Organic Compounds, Sulphur Dioxide and Oxides of Nitrogen are measured.	94%
<b>Noise</b>	Noise levels are measured at two locations near the surrounding community on the perimeter of the Trinidad LNG Facilities, once per quarter on a quarterly basis; Results are compared against the Noise Pollution Control Rules, 2001.	100%
<b>Effluent</b>	The quality of the water leaving the facility from the Sewage Treatment Package (STP) and CPI Separator is monitored to determine the facility's compliance with discharge limits of the Water Pollution Rules 2001 (as amended in 2006). Parameters monitored monthly include pH, biological oxygen demand, faecal coliforms, total suspended solids, and total residual chlorine. Parameters monitored on a quarterly basis include temperature, chemical oxygen demand, conductivity, total petroleum hydrocarbon and cyanide. Parameters monitored semi-annually include cadmium, nickel, chromium, and copper, followed by annual monitoring of acute toxicity.	100% (Sewage Treatment Package) 63.1% (Corrugated Plate Interceptor)
<b>Ambient Air</b>	Monitoring is currently conducted at the four cardinal points in the facility as well as two points in the Point Fortin Community. Pollutants measured include Particulate Matter, Total Suspended Solids, Carbon Monoxide, Volatile Organic Compounds, Sulphur Dioxide, and Oxides of Nitrogen, Hydrogen Sulphide and Mercury. Monitoring is done twice per quarter for all parameters except Mercury (once per year) and hydrogen sulphide (bi-annually).	100%

**Environmental Action Plan**

In 2011, an Environmental Action Plan (EAP) was developed by a cross-functional team and implemented with the goal of driving overall environmental performance. The key areas of focus were:

- Greenhouse Gas (GHG) and other emissions
- Communication Issues
- Solid Waste
- Liquid Waste

This first EAP had a total of 134 actions, and of this, 83 percent completion was

achieved with a total of 112 actions closed. The plan seeks to minimise negative environmental impacts by looking at ways to:

- Improve the way we operate. It allows for the relevant persons to take a critical look at the most pressing areas of concern within our business and determine actions to address them. All the actions on this plan seek to curtail negative impacts on today's environment.
- Reduce GHG emissions by determining our current emissions and looking at projects currently being designed to

include possible means of reduction.

- Determine the best disposal methods for the waste produced on the Facility.
- Introduce environmentally friendly products for use on the Facility, to embed a green culture in all aspects of work.

## Energy and Our Potential Impacts

In 2011 Atlantic participated with the Ministry of Energy and Energy Affairs in the Carbon Reduction Strategy Task Force. We value our involvement in these discussions that will have a bearing upon national and regional climate change policy development.

## Direct Energy Sources Produced and Used

The energy produced from all feed gas entering Atlantic’s Facility includes what is used by the Facility for the provision of intermediate energy, such as electricity and heating, and what is processed into LNG and Natural Gas Liquids (NGL) for distribution to customers.

Atlantic employs the Optimised Cascade Process (ConocoPhillips) to convert natural gas from a gas to a liquid. The feed gas to the process produces:

- LNG
- NGL
- Energy for Process Compression
- Energy for Utilities

LNG is the primary product from feed gas entering the Facility. A secondary product is NGLs which is a propane-rich composition of heavy hydrocarbons and is transported via pipeline to Phoenix Park Gas Processors Ltd (PPGPL).

To drive the liquefaction process at Atlantic a portion of the feed gas is consumed as fuel. The major fuel consumers are the Process Compressors responsible for liquefaction, with the remainder being consumed by the Utilities. The Utilities consist of:

- Turbine Generators (TGs) which produce the required electricity for Atlantic’s process equipment
- Fired Heaters needed for process heating requirements.

A small portion of the feed gas is categorised as “losses” as the feed gas is lost due to flaring and fugitive emissions.

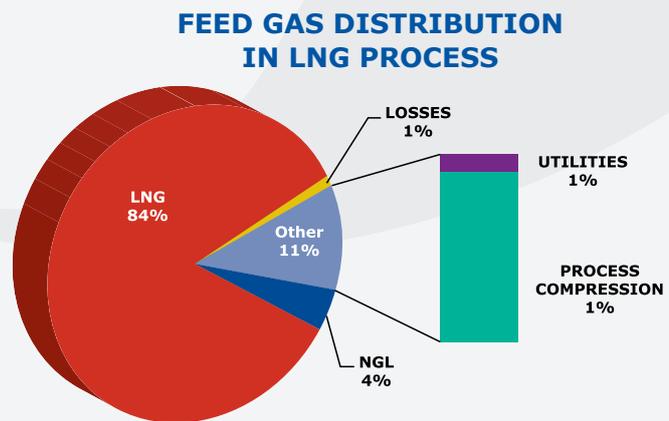


Figure 1: Direct Energy use by Atlantic in the production of LNG and NGL

From the Feed Gas distribution 11 percent is used for total power generation – 10 percent used to power 27 gas turbines in the process, 1 percent utilities (used for electricity generation through the nine (9) turbine generators and fired gas heaters on the Facility). These generators are used to generate electricity, primarily for all motors, drivers for pumps and compressors, fin fans, utility lighting and other minimal energy users.

**Water Management Strategy**

Atlantic’s primary process water source is fresh water supplied by the national water utility company which is used on the Facility and administrative buildings. At Atlantic’s Facility in Point Fortin, safe potable water is not always readily available, especially during the dry season. Our Business Continuity Plan has evaluated scenarios for an extended dry season and scarcity of water resources. We are mindful of the effects of climate change on existing water supplies. In 2011, we measured our freshwater intake to be approximately 122,043 cubic metres per year (m<sup>3</sup>/year).

*Table 4: Municipal water supplies to the Facility (exclusive of the administration buildings) from 2007 to 2011*

Years	2007 a	2008 b	2009 a	2010 a	2011 a
Water Usage/m <sup>3</sup>	69,542	108,043	95,015	96,234	122,043

Key:  
 a: Values received from Water and Sewerage Authority (WASA)  
 b: Values estimated from Atlantic

**Efficient Use of Water**

Atlantic’s use of water is substantial and therefore effective water management is critical to Atlantic’s “licence to operate.” It is important to our operations to have a strategic approach towards a safe and reliable water supply. In recognition that water is critical to Atlantic’s operation, the Company continues to identify new opportunities for water management. Some initiatives include the continuous upgrade of the fire water systems and the installation of two water reservoirs in the event of drought or shortage in water supply.



*Atlantic facilitated a Biodiversity Display to raise awareness of the importance of plant and animal species*

**Protecting Biodiversity**

Atlantic is working to leave a “greener” environment for future generations by incorporating steps to preserve our natural environment, including:

- Increasing awareness among schools and community on biodiversity through our annual Biodiversity Display of plants and animals;
- Programmes such as Seeds of Hope and Turtle Village Trust for the preservation and protection of plants and wildlife.

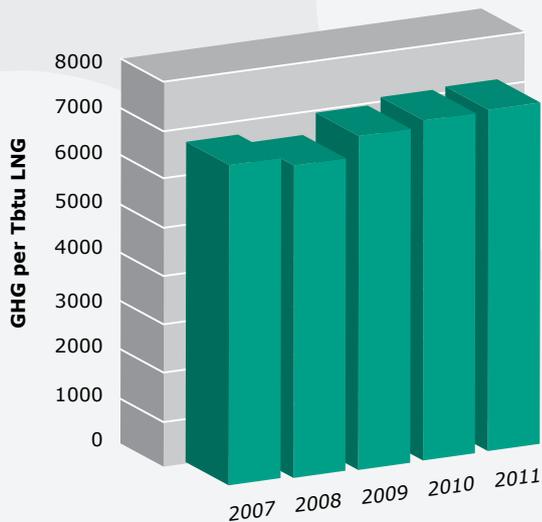
# Sustainability at Atlantic

## Greenhouse Gas (GHG) Emissions

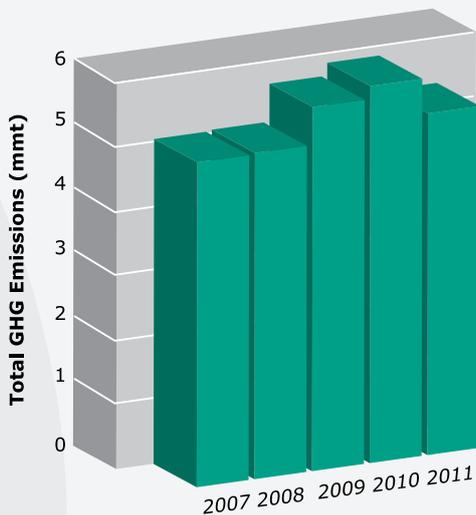
At Atlantic, GHGs produced from the LNG process are recorded on a monthly basis via a GHG Calculator. In 2011, on an absolute value based on mass balance calculations, the GHG emissions for Atlantic's Point Fortin Facility were 5.31 million metric tonnes.

Atlantic monitors and manages GHG emissions from the production process through multiple approaches, including efficiencies of operations and reductions in flaring.

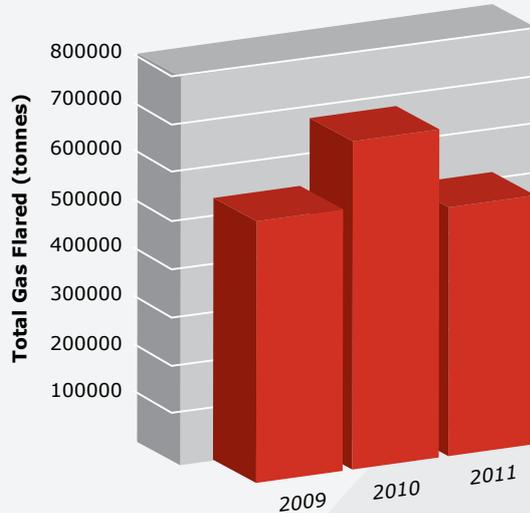
**Total Facility Greenhouse Gas Emissions per Tbtu LNG**



**GHG Emissions for period 2007 to 2011**



**Total Gas Flared**

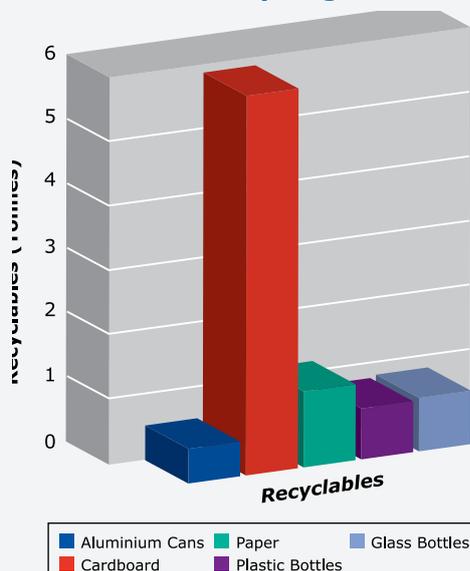


## Waste Reduction Initiatives

### Recycling

Atlantic has a company-wide initiative that encourages recycling, waste reduction and the removal of products that cannot be recycled – all with the specific goal to curtail the amount of waste going to local landfills. All Atlantic premises have recycling bins in place and this initiative is constantly monitored to increase the scope to include other items that can be recycled. Materials recycled include paper, cardboard, plastic, aluminium cans, glass and metal. We also collect used oil and e-waste for disposal.

**Recycling 2011**



### Waste Management

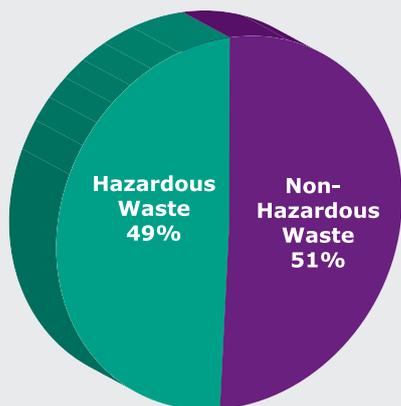
Total weight of waste by type and disposal method.

Information About Waste Produced	Quantity (Tonne/Year)	Name
Hazardous waste for disposal	2,691.21	
Non-hazardous waste for disposal	2,751.59	
Total waste produced	5,442.80	26 Waste Streams

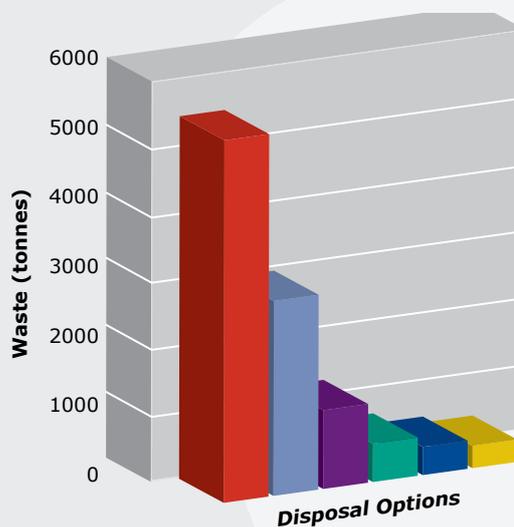
Largest Waste Streams	Quantity (Tonne/Year)	Name
1st largest waste stream	2,657.00	General Waste
2nd largest waste stream	639.34	Contaminated Amine
3rd largest waste stream	514.45	Molecular Sieve

Waste Disposal Routes	Quantity (Tonne/Year)
Incineration	423.95
Landfill	2,926.04
Recycle/Reuse	575.45
Bioremediation	1,182.42

### Hazardous and Non-Hazardous Waste Generated 2011

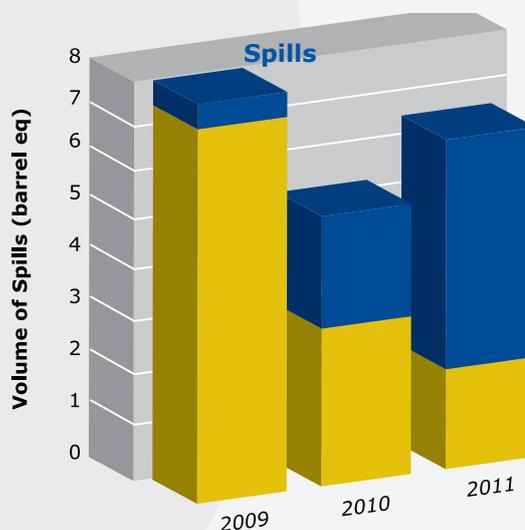


### Waste Disposal 2011



KEY

Total Waste	Bioremediation	Incineration
Landfill	Recycle/Reuse	Storage



There have been no known breaches of existing legislation for 2012 by the Company.

# Sustainability at Atlantic

## Impacts of Ground Transportation

Atlantic's shuttle service helps to manage the risk to employees while on the road, while also providing an environmental benefit. The shuttle service is extended to daylight and shift employees. Two shuttles leave from Chaguanas and San Fernando destined for Point Fortin. This assists employees with fatigue and stress management. The shuttles are appreciated and well utilised by employees. We also manage a courier service that goes from Point Fortin to Port of Spain on weekdays.

## ENVIRONMENTAL ADVOCACY AND AWARENESS

Several initiatives are undertaken every year to demonstrate Atlantic's commitment and advocacy for a clean, managed environment. The initiatives are based on the principles of sustainable development which promote ecosystem management, minimise the depletion of non-renewable resources, change personal attitudes and practices, nurture respect and care for the community of life, and restore degraded environments. Among the initiatives undertaken in 2011 were:



*Asa Wright tour guide leads a group of Atlantic employees*

## Eco-walks at Asa Wright Nature Centre

Atlantic's eco-walks at Asa Wright Nature Centre are aimed to raise awareness of the importance of our forests and how

much they contribute to our quality of life. Employees and their families participated in guided tours along the trails of the Spring Hill estate, where they were introduced to the diverse tropical flora and fauna of the Arima valley. Along the way, they encountered some of the 159 species of birds, butterflies, and small creatures, including agouti, armadillo and fire ants.



*Employees did their part to conserve the natural environment*

## Fruit Tree Planting Exercise

The aim of the fruit tree planting exercise was to facilitate the restoration of fruit trees no longer seen in the community. Staff volunteers brought trees and, with the help of local residents, set about repopulating the community with these trees.



*Employees got up close and personal with local wildlife*

## Biodiversity Display

Over 1,200 persons, mainly children, visited the biodiversity display at the Ministry of Food Production, Land and Marine Affairs in

Point Fortin where they got the opportunity to interact with animals and learn about different ecosystems.

At Atlantic's request, the El Socorro Centre for Wildlife Conservation (ECWC) conducted a biologically diverse education display in a tropical rainforest setting to celebrate World Environment Day 2011 in the Point Fortin Community.



*Employees and their families helped clean up Guapo Beach in 2011*

### **International Coastal Clean-up (ICC) at Guapo Beach, Point Fortin**

For a fifth year, Atlantic participated in an exercise to clean up and measure the types of garbage collected on coasts all around the world on one day. On September 17, 2011, 220 volunteers picked up and sorted 1,542 pounds of garbage at the Guapo Beach in Point Fortin.

### **Environmental Feud – Employees and Contractors**

Atlantic developed and hosted an innovative in-house competition called "Environmental Feud" to engage employees and contractors on environmental matters. The objective was to increase general and technical knowledge of the environment, encouraging participants to engage in safe work practices and make responsible choices in all areas of activity.



*Atlantic's first interdepartmental recycling competition was a big success*

### **Recycling Competition**

For the first time, Atlantic hosted an interdepartmental recycling competition geared to promote collection for its recycling programme. Employees were asked to collect recyclables which were weighed and recorded. Ten departments collected 854 pounds of glass, cans and plastics for recycling.

### **Environmental Lectures**

To complement these various eco-activities, a series of lectures was scheduled on topics such as organic food, pollution prevention, climate change, water conservation. Guest presenters were Dr Azard Mohammed, UWI Professor, on Climate Change and Pollution Prevention, Wayne Clement, Manager, Water Resources Agency, on Managing Trinidad and Tobago's Water Resources, and Mrs Daisie Sammy-Christopher, Educator, on Organic Foods and Lifestyle.

## Atlantic People



**The development of employees, and ultimately a cohesive, interdependent and highly productive workforce, forms the base of the long-term strategy for the human resource that is driving all activity and performance in the Company.**

*Employees in attendance at our 2011 Kick-Off Staff Meeting*

Atlantic works towards being known as the “employer of choice” among financial and energy sector companies in Trinidad and Tobago. The development of employees, and ultimately a cohesive, interdependent and highly productive workforce, forms the base of the long-term strategy for the human resource that is driving all activity and performance in the Company.

The Human Resources (HR) department is led by a Vice President reporting directly to the Chief Executive Officer. The responsibilities of the department include coordination of all aspects of an employee’s relationship with the Company in a structured approach that involves dissemination of

information through management and leadership teams. Day-to-day contact, communication and coordination of HR issues all fall under the remit of the managers. Company policies, HR-related forms and documents are made available electronically via the Company's intranet. Employees are advised of updates and new policies through face-to-face meetings where inputs are invited.

Every two years a survey is carried out by an independent consultant to assess employee satisfaction at Atlantic, and to compare these results to a benchmark group of companies in the energy sector as well as others in financial and service sectors. The last survey was conducted in 2010 and the next is to be conducted in 2012.

## POLICIES

Atlantic has in place a system of policies and procedures. All policies are developed with consideration of human rights principles as enshrined in national laws and international best practice.

A No-Smoking policy was ratified in 2011. This extends to all Atlantic premises including the Port of Spain offices and the new administration building in Point Fortin. A "no tolerance" policy on drugs and alcohol use is in place and employees expect to be randomly tested at any time. Contractors or suppliers preparing to work at the Facility are expected to provide the certified results of recent relevant drug tests.

Health and well-being are important supports to a safety culture. Employee support services include shuttles, gym facilities and day care centres in Point Fortin and Port of Spain.

The Company's incentive plan was finalised at the end of 2011 for introduction in 2012.



*At Atlantic, we celebrate the diversity of our workforce*

## THE ATLANTIC WORKFORCE

In 2011 the core workforce amounted to 698 persons and included 24 graduate trainees and 16 operator trainees. Graduate trainees are selected from applicants who have recently graduated from university with a first degree. These are placed on fixed contracts for two years and deployed in units across the organisation. At the end of their contracts graduate trainees have the opportunity to apply for positions within the Company, based on job availability. Otherwise, they are encouraged to leverage their Atlantic experience in their subsequent job searches.

The gender ratio is 195 females to 503 males. The demands of a 24-hour operating environment, which necessitates shift work, may explain this ratio. Notwithstanding these constraints, Atlantic has an equal opportunity policy that is buttressed by national legislation.

In 2011, Atlantic employed 48 persons, of which 15 were women and 33 men. In the same period, 25 persons exited, 13 male and 12 female.



*Our people are at the heart of our business*

**EMPLOYEE TURNOVER BY AGE GROUP AND GENDER  
AS AT DECEMBER 31, 2011**

	Age Group	Male	Female	Total	Percentage
1	Employees 21 to 30	3	1	4	16
2	Employees 31 to 40	5	7	12	48
3	Employees 41 to 50	1	2	3	12
4	Employees 51 to 60	4	2	6	24
5	Employees 61 and over	0	0	0	0
	<b>Total</b>	13	12	25	<b>100</b>

## HUMAN RIGHTS

Atlantic operates within the jurisdiction of the laws of the Republic of Trinidad and Tobago. The state is a signatory to the rights of people as articulated in declarations of the United Nations, including equal opportunity, gender equality and the prohibition of child labour and forced labour.

Applicable rights and principles also form part of the Supplier Code which has been developed to govern the relationship with suppliers and contractors. This Code becomes an essential part of all contracts with Atlantic over the next three years.

**PROCESS SAFETY AND ASSET INTEGRITY**

Personal and Process Safety in LNG operations also depends on the integrity of the mechanical plant and its processes.

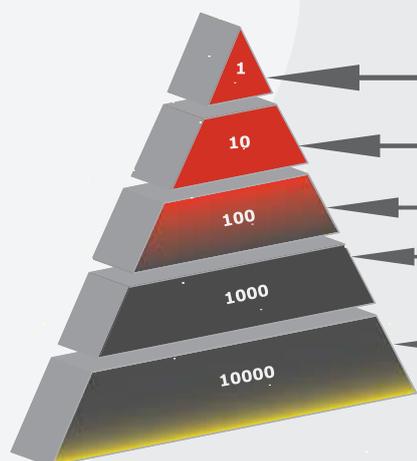
In 2011, in order to better manage the intricate and complex relationships between humans and equipment, specific procedures were identified, given additional resources and strengthened. The 2011 plan for our Asset Integrity Management System (AIMS) was implemented, with 48 out of 49 milestones being completed. The outstanding milestone, which was to develop and implement the Competency Development Tool (CDT) for the Planning and Operations Teams, was progressed to 87 percent. As a result of the organisational change that merged the Planning and Maintenance Teams, the implementation for

the Planning Team was temporarily placed on hold. We introduced an online Permit-to-Work system for testing, in anticipation of being fully implemented in 2012.

Additionally, we completed our Risk Based Work Prioritisation (RBWP) system in 2011, which went live in September. Members of relevant teams, totalling 450 employees, were trained on how the system works and we are currently in a transition phase from the previously used Priority 1-6 method.

In 2011, we also tested 489 out of 493 process safety valves (PSVs), and our compliance on safety critical equipment (SCE) improved from less than 25 percent to over 90 percent.

A new department with specific responsibility for management of projects and turnarounds was also established.



**SAFETY PERFORMANCE**

	2010	2011
<b>Fatality</b>	0	0
<b>Lost Time Injuries (LTI)</b>	0	0
<b>Record Injuries Restricted Work Case (RWC) &amp; Medical Treatment Case (MTC)</b>	1	5
<b>First Aid</b>	31	118
<b>Hazards – Unsafe Acts – Employee Created Unsafe Conditions</b>	2,994	2,599
<b>Behavioural Safety Observation (BSO)/ Advanced Safety Audit (ASA) Safety Training Observation Programme (STOP)</b>	11,942	11,787

<b>Current man-hours without an OSHA Recordable</b>	231,513
<b>Previous man-hours without an OSHA Recordable</b>	968,836
<b>Current man-hours without a Lost Time Injury</b>	14,947,357
<b>Previous man-hours without a Lost Time Injury</b>	1,912,707

## The Sustainable Approach to Plant Maintenance

*Atlantic recognises that the key to asset reliability and integrity is a proactive – rather than reactive – approach to maintenance. Preventative scheduled maintenance was planned and implemented successfully on Train 4 in 2011, demonstrating our commitment to continuous improvement.*

We recognise the importance of regular and efficient maintenance for the continuing integrity of the asset. The Train 4 Turnaround (TAR) exercise was planned as a strategic approach to maintenance. Scheduled over a 29.5 day period, between October and November 2011, the success of this activity may be attributed to collaborative planning, rigorous safety processes and effective management and communication controls with the frontline implementation team as the focus.

The key activities included:

- Modular changeout on six machines
- Compressor work on all eight machines
- Replacement of high efficiency filters
- Flare line modifications

- Vessel inspections
- Molecular sieve changeouts
- Front end filter changeouts
- Distributed Control System (DCS) Upgrades
- Safety Instrumented Systems (SIS) Testing
- Inspections and repairs on anti-surge valves
- Minor mechanical Electrical and Instrumentation (E&I) work

The turnaround included several high risk procedures including 399 heavy lifts, 133 confined space entries. In terms of hot works, 141 welds were completed. With manpower levels reaching a peak of 1,880 during this period, there was competition for work space, scaffolding, overhead cranes and man-lifts. The increase in personnel on-site posed another challenge to coordinating the necessary permits to work, and mitigating delays around the process.

Apart from an incident on Day 4 which resulted in one OSHA recordable, overall safety performance was outstanding. In all, 654 planned jobs were completed without further recordables or Lost Time Injuries.

Other results of this exercise include improved cross-functional collaboration, and demonstrations of continuous improvement as lessons were learned and applied on the job. An approach to merge Lessons Learned meetings with SIMOPS (simultaneous operations) meetings, was adopted to facilitate immediate integration of lessons from turnaround activities into planning future projects. The process was further strengthened by capturing lessons during execution and immediately collating them in a database for easy reference when planning future activities.

# Assurance Statement

**Atlantic contracted CSR Solutions Limited to provide independent verification on information presented in its Sustainability Report 2011, in accordance with AA1000 Assurance Standard 2008 (AA1000AS 2008). This statement provides an independent, third party assessment of the organisation's management processes and adherence to AA1000AS 2008 principles.**

## SCOPE OF OUR WORK

The scope of our work includes information covering the period January 1st to December 31st 2011 presented in the Atlantic Sustainability Report 2011. We have evaluated adherence to the principles of inclusivity, materiality and responsiveness as outlined in AA1000 Accountability Principles Standard (APS) 2008. We reviewed a selection of data presented which records Atlantic's achievements against their Sustainability Action Plan. Our scope of work did not include the validation of historical, financial or economic data.

## OUR INDEPENDENCE

CSR Solutions Limited is an independent consulting firm which specialises in Corporate Social Responsibility and Sustainability. We were not involved in the preparation of the Sustainability Report 2011 and none of our members of staff maintain any associations with Atlantic. In 2011, a director at CSR Solutions Limited formed part of a panel of judges for the CEO's Sustainability Awards 2011. Participation on this panel (which included conducting interviews with finalists) provided additional information that assisted in supporting the evaluations of this independent assurance.

## OUR RESPONSIBILITIES

Our responsibility was to provide independent assurance to all Atlantic's stakeholders as outlined in the Sustainability

Report 2011. Atlantic was responsible for the preparation of the Sustainability Report 2011 including the collection and presentation of information contained within.

## OUR APPROACH TO THE ASSURANCE

AA1000AS 2008 guided the planning and performance of our work. In order to obtain sufficient evidence to provide the basis for our assurance conclusions, we conducted the following activities:

- Review of information presented in Atlantic Sustainability Report 2011
- Interviews with management and staff in relation to policies, processes and procedures aimed at embedding sustainability across all areas of business and the relationship of these to the data collection and reporting process
- Interviews with employees
- Interviews with a sample of external stakeholders
- Review of management reports, external correspondence and other supporting documentation
- Review of current sustainability issues relevant to Atlantic and its stakeholders
- Presentation of a management report to Atlantic including conclusions and major recommendations toward improving the sustainability reporting process and report.

## OUR CONCLUSIONS

The Sustainability Report 2011 was reviewed by CSR Solutions in its draft form and, where necessary, based on feedback provided, changes were made by Atlantic. The report is structured around the guidelines of the Global Reporting Initiative (GRI) and includes an index of GRI Indicators reported against.

### Inclusivity

*This principle refers to the participation of stakeholders in developing and achieving an accountable and strategic response to sustainability.*

# Assurance Statement

Atlantic recognises the journey involved in embedding sustainability and has embraced the inclusion of internal and external stakeholders on this journey. They continue to plan and execute various activities; including studies, surveys and meetings to engage their stakeholders; all of whom are clearly defined and targeted. The Annual Sustainability Awards continues to be an important event for employees and partners and has seen growing participation over the years, helping to reinforce the concept throughout all areas of operation. These efforts should be maintained.

### Materiality

*This principle refers to the determination of the relevance and significance of an issue to the organisation and its stakeholders.*

Atlantic clearly defines its strategic objectives, and stakeholder engagement throughout the year has contributed to the identification and prioritisation of sustainability issues. HSSE and Asset Integrity continue to be important areas. There are noted improvements in the internal control systems associated with the tracking of environmental data to present more information to stakeholders. However, there is need for specific reduction targets in relation to environmental indicators with clear actions to achieve these.

### Responsiveness

*This principle refers to the organisation's response to stakeholder issues that affect its sustainability performance and is realised through decisions, actions and performance, as well as communication with stakeholders.*

Atlantic has worked toward improving the engagement with stakeholders both in terms of stakeholder identification and communication. Mechanisms have been developed to incorporate stakeholder issues, with specific focus group sessions being convened to gain feedback on the Sustainability Report. It is important for Atlantic to present clear commitments and targets, with specific actions undertaken to achieve these.

### CONCLUSIONS

While Atlantic continues to strengthen its approach to reporting and its focus on the Global Reporting Initiative (GRI) framework and indicators, there is still room for more awareness and integration of these indicators throughout the organisation. This will allow for information to be captured and tracked in line with the indicators to be reported on, thereby improving the reporting process.

**CSR Solutions Limited**  
**Melanie Richards, Director**  
**Port of Spain, May 23rd 2012**

## INDEX OF GRI INDICATORS

GRI REPORTING STANDARD INDICATOR PROTOCOL SET	CONTENT HEADING	GRI INDICATOR
Economic (EC) Environment (EN)	Sustainability at Atlantic Case Studies Water Management Strategy Protecting Biodiversity Greenhouse Gas (GHG) Emissions	EC9 EN8 EN14 EN16 EN22, EN23
Society (SO) Labour Practices (LA)	Waste Management Engagement Process The Atlantic Workforce Process and Personal Safety	SO1 LA1, LA2 LA7





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