

ENTERGY SYSTEM POLICIES & PROCEDURES

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Title: Environmental, Occupational Health & Safety (EHS) Policy		Last Revision: 4/29/2022	Rev. 0.1
Subject Matter Expert: Paul Leonard	Responsible Officer: Paul Hinnenkamp	Approved By: Corporate Compliance Committee	

I. POLICY SUMMARY

- The purpose of this Policy is to set Entergy's policy direction and responsibilities surrounding environmental, occupational health, and safety (EHS) related matters.
- Entergy is committed to being recognized as a leader in EHS management by achieving world-class EHS performance in our business operations.
- Entergy EHS Policies and Standards may be created and revised as necessary to manage compliance with EHS laws, regulations, and best business practices.
 - The Executive Vice President and General Counsel has the authority to approve, interpret, and administer Entergy Environmental Policies and Standards.
 - The Executive Vice President and Chief Operating Officer has the authority to approve, interpret, and administer Entergy Occupational Health & Safety Policies and Standards.
- Entergy EHS Policies and Standards apply to all Entergy employees, agents and contractors.
- Each Entergy Function shall develop, implement, maintain, and regularly evaluate EHS programs and procedures consistent with the Entergy EHS Policies and Standards.
 - Functional Leadership has the authority to approve, interpret and administer Functional Environmental Programs and Procedures and Functional OH&S Programs and Procedures pursuant to their operations.
- All employees, agents and contractors of Entergy shall immediately report known, suspected, or potential violations of this Policy by following the procedures described in the Reporting Violations Policy.
- **Please refer to the following detailed Policy for further information.**

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II. DETAILED POLICY

1.0 PURPOSE AND APPLICABILITY

The purpose of this Policy is to set Entergy's policy direction and responsibilities surrounding environmental, occupational health, and safety related matters and to set forth the authority to establish, implement, maintain, and administer Entergy EHS Policies and Standards.

THIS POLICY APPLIES TO ANY AND ALL EMPLOYEES OF ANY ENTERGY SYSTEM COMPANY, UNLESS OTHERWISE EXPRESSLY EXCLUDED, AS WELL AS AGENTS AND CONTRACTORS OF ANY ENTERGY SYSTEM COMPANY.

THIS POLICY COVERS EMPLOYEES WHO ARE REPRESENTED BY A UNION, EXCEPT THAT ANY CONFLICTING TERMS OF EMPLOYMENT IN A COLLECTIVE BARGAINING AGREEMENT OR OTHER AGREEMENT REACHED WITH THE UNION(S) SHALL CONTROL.

NOTHING CONTAINED IN THIS POLICY SHOULD BE CONSTRUED TO SUGGEST THAT EMPLOYEES OF A PARTICULAR SUBSIDIARY OR AFFILIATE OF ENTERGY CORPORATION ARE ALSO EMPLOYEES OF ENTERGY CORPORATION OR ANY OTHER AFFILIATE OR SUBSIDIARY OF ENTERGY CORPORATION. MOREOVER, THIS POLICY DOES NOT CREATE ANY EMPLOYMENT RELATIONSHIP BETWEEN ANY PERSON AND ANY ENTERGY SYSTEM COMPANY, NOR DOES THIS POLICY CONFER ANY CONTRACTUAL RIGHT TO ANY PERSON TO BECOME OR REMAIN AN EMPLOYEE OF AN ENTERGY SYSTEM COMPANY.

THIS POLICY IS NOT INTENDED TO, AND SHALL NOT BE CONSTRUED TO, INTERFERE WITH OR RESTRICT ANY RIGHTS PROVIDED BY LAW, INCLUDING THOSE AFFORDED UNDER THE NATIONAL LABOR RELATIONS ACT. NOTHING IN THIS POLICY WILL BE CONSTRUED TO LIMIT AN EMPLOYEE'S RIGHT TO SPEAK WITH OTHERS REGARDING WAGES AND OTHER TERMS AND CONDITIONS OF EMPLOYMENT OR TO EXERCISE ANY OTHER LEGALLY PROTECTED RIGHT.

2.0 REFERENCES & CROSS REFERENCES

2.1 Entergy System Policies - Reporting Violations

2.2 Entergy EHS Policies and Standards

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3.0 **DEFINITIONS**

- 3.1 **EHS** – Environmental, occupational health, and safety.
- 3.2 **Entergy EHS Management System** – The compilation of Entergy EHS Policies and Standards, Functional Environmental Programs and Procedures, and Functional OH&S Programs and Procedures across Entergy that form a risk-based and systematic approach to EHS management pursuant to ISO 14001 and ISO 45001 standards.
- 3.3 **Entergy EHS Policies and Standards** - The policies and standards implemented by Entergy as Specialized Policies pursuant to Section 5.4 of this Policy to manage compliance with environmental, occupational health, and safety laws, regulations, and best business practices.
- 3.4 **Entergy Environmental Policies and Standards** – Entergy EHS Policies and Standards that apply specifically to environmental matters.
- 3.5 **Entergy Occupational Health & Safety Policies and Standards (Entergy OH&S Policies and Standards)** – Entergy EHS Policies and Standards that apply specifically to occupational health and safety matters.
- 3.6 **Entergy System Company, Entergy, or Company** – Entergy Corporation and all of its regulated and non-regulated subsidiaries and affiliates in which Entergy Corporation has a direct or indirect majority ownership interest.
- 3.7 **Function(s) / Functional** – A division of Entergy such as a legal entity (e.g., operating company), Power Generation, Utility, Nuclear, or any other business, department, or sub-division of the organization.
- 3.8 **Functional Environmental Programs and Procedures** – Function-specific documents establishing how a Function will address the expectations regarding Environmental risks/compliance that are established within Entergy Environmental Policies and Standards.
- 3.9 **Functional Occupational Health & Safety Programs and Procedures (Functional OH&S Programs and Procedures)** – Function-specific documents establishing how a Function will address the expectations regarding Occupational Health & Safety risks/compliance that are established within Entergy OH&S Policies and Standards.
- 3.10 **Functional Leadership (Functional Leader)** – The senior-most leader of the Function developing a Functional EHS program or procedure.

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- 3.11 Policy** – This Environmental, Occupational Health & Safety (EHS) Policy.
- 3.12 Specialized Policy** - As defined in the Entergy system policy titled Policy Development and Oversight Policy.
- 3.13 Subject Matter Expert (SME)** – The Entergy employee who is the designated authority over an area addressed by one or more Entergy EHS Policies and Standards.
- 3.14 Vice President, Sustainability and Environmental Policy** – Functional executive responsible for establishing Entergy Environmental Policies and Standards based on delegation by the Executive Vice President and General Counsel.
- 3.15 Vice President, Safety** – Functional executive responsible for establishing Entergy Occupational Health & Safety Policies and Standards based on delegation by the Executive Vice President and Chief Operating Officer.

4.0 RESPONSIBILITY

4.1 Employees, agents and contractors are responsible for:

- Complying with this Policy and the Entergy EHS Management System
- Immediately reporting known, suspected, or potential violations of this Policy by following the procedures described in the Reporting Violations Policy

4.2 Enterprise Safety is responsible for:

- Developing the Entergy EHS Management System
- Developing Entergy OH&S Policies and Standards (in coordination with Sustainability and Environmental Policy)
- Developing procedures that are specific to Enterprise Safety and pursuant to the requirements established in the Entergy OH&S Policies and Standards
- Administering the review and approval process for Entergy OH&S Policies and Standards
- Ensuring that the opportunity for prior input and appropriate cross-functional review occurs for each business unit significantly affected by new or revised Entergy OH&S Policies and Standards prior to approval
- Providing support to Functions in development of Functional OH&S Programs and Procedures

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- Facilitating appropriate change management for new or revised Entergy OH&S Policies and Standards

4.3 **Sustainability and Environmental Policy** is responsible for:

- Developing the Entergy EHS Management System (in coordination with Enterprise Safety)
- Developing appropriate Entergy Environmental Policies and Standards
- Administering the review and approval process of Entergy Environmental Policies and Standards
- Ensuring that the opportunity for prior input and appropriate cross-functional review occurs for each business unit significantly affected by new or revised Entergy Environmental Policies and Standards
- Providing support to Functions in development of Functional Environmental Programs and Procedures
- Facilitating appropriate change management for new or revised Entergy Environmental Policies and Standards

4.4 **Vice President, Sustainability and Environmental Policy** – is responsible for:

- Developing the appropriate Entergy EHS Management System components (based on delegation by the Executive Vice President and General Counsel)
- Approving Entergy Environmental Policies and Standards and revisions thereto (based on delegation by the Executive Vice President and General Counsel)
- Designating the SMEs for Entergy Environmental Policies and Standards

4.5 **Vice President, Safety** – is responsible for:

- Developing the appropriate Entergy EHS Management System components (based on delegation by the Executive Vice President and Chief Operating Officer)
- Approving Entergy OH&S Policies and Standards and revisions thereto (based on delegation by the Executive Vice President and Chief Operating Officer)
- Designating the SMEs for Entergy OH&S Policies and Standards

4.6 **Executive Vice President and Chief Operating Officer** is responsible for:

- Delegating the responsibility for developing and approving the appropriate Entergy EHS Management System components to the Vice President, Safety
- Developing and approving Entergy Occupational Health and Safety Policies and Standards or delegating such responsibility to the Vice President, Safety

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- 4.7 Executive Vice President and General Counsel** is responsible for:
- Delegating the responsibility for developing and approving the appropriate Entergy EHS Management System components to the Vice President, Environmental
 - Developing and approving Entergy Environmental Policies and Standards or delegating such responsibility to the Vice President, Environmental

4.8 Responsible Functional Leader, designee, or successor, in consultation with Enterprise Safety or Sustainability and Environmental Policy, is responsible for ensuring the implementation of EHS controls referenced in this Policy and specified in Entergy EHS Management System. Function specific programs and procedures are subject to the Function's applicable approval processes.

- 4.9 Subject Matter Experts** are responsible for:
- Ensuring that Entergy EHS Policies and Standards are kept current, considering emerging laws, regulations, and best business practices
 - Interpreting the provisions of Entergy EHS Policies and Standards for which they are responsible, as needed

5.0 DETAILS

5.1 Entergy's Environmental, Occupational Health, and Safety Commitment Entergy is dedicated to being recognized as the premier utility and industry leader in EHS performance by proactively, responsibly, and sustainably managing our business operations to protect our employees, contract partners, customers, and the communities in which we serve. This Policy sets forth Entergy's direction and commitments to promote sustainable practices with the goal of continuously minimizing potential EHS risks and achieving world-class EHS performance. Accordingly, Entergy pledges to the following.

5.1.1 Inclusion and Accountability - Ensure that our employees, contract partners, and leadership have shared responsibility and accountability for EHS strategies, which include the support and creation of a sense of community and belonging that empowers our workforce to take ownership and feel safe in their work environment.

5.1.2 Incident Prevention and Corrective Action

5.1.2.1 Provide a safe and healthy workplace for the prevention of EHS events, injuries and illnesses and empower employees to actively identify and address hazards and

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unsafe working conditions to care for themselves and others.

5.1.2.2 In the event of an incident impacting EHS, promptly study the incident and develop any necessary causal-based corrective actions and establish ownership and implementation of each causal-based corrective action for the Company, Function, or location.

5.1.3 Environmental Stewardship and Community Service

5.1.3.1 Protect the environment by responsibly managing resources; ensuring compliance with all laws, regulations and permits; and, reducing/minimizing environmental impacts from operations.

5.1.3.2 Foster opportunities to improve the environment and contribute to the positive social and economic impact across the communities we serve.

5.1.4 Risk and Compliance Management

5.1.4.1 Evaluate and manage known EHS risks by minimizing them to the lowest level possible and controlling EHS significant aspects and impacts.

5.1.4.2 Equip our employees and contract partners with the tools and knowledge to comply with or exceed applicable EHS compliance obligations, internal/external commitments, and legal requirements, meeting not only the letter but also the spirit of these requirements.

5.1.5 Stakeholder Engagement and Transparency - Build trust and establish open channels for communication and feedback with all stakeholders to understand and anticipate their emerging needs and deliver sustainable value, as measured by consistently positive customer interactions, and highly reliable and exceptional service.

5.1.6 Goal Setting

5.1.6.1 Establish and integrate EHS management and sustainability objectives into our strategic planning and decision-making.

5.1.6.2 Create forward-looking, viable strategies and deliver reliable solutions to maintain quality of life for our

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customers and communities and ensure long-term success for our owners and employees.

5.1.7 Continuous Improvement and Sustainability - Implement and maintain an EHS management system that is consistent with this Policy and supports continuous improvement by providing a framework for the development of standards that drive alignment across business functions for streamlining our business, and achieving significant EHS milestones that demonstrate our continued progress toward realizing efficiency improvements, sustainable performance, and our mission to become the premier utility.

5.2 EHS Management System To deliver on this pledge and to drive continuous improvement, Entergy shall implement an EHS management system that is compliant with ISO 14001 and 45001 Standards with the goal of minimizing adverse environmental impacts and being incident free.

5.3 Compliance with Environmental, Occupational Health, and Safety Laws, Regulations, and Best Business Practices

5.3.1 Entergy requires employees, agents and contractors to comply with applicable environmental, occupational health, and safety laws, regulations, and best business practices.

5.3.2 Entergy EHS Policies and Standards (see Section 5.4 below) may be created and revised as necessary to manage and facilitate compliance with applicable environmental, occupational health, and safety laws, regulations, and best business practices.

5.4 Entergy EHS Policies and Standards

5.4.1 The Executive Vice President and Chief Operating Officer has the authority to approve Entergy EHS Policies and Standards that apply to the topic of occupational health and safety and to approve revisions to Entergy OH&S Policies and Standards. The Chief Operating Officer also may delegate such authority to an appropriate member of senior management (i.e., the Vice President, Safety).

5.4.2 The Executive Vice President and General Counsel has the authority to approve Entergy Environmental Policies and Standards and approve revisions to existing Entergy Environmental Policies and Standards. The Executive General Counsel also may delegate

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such authority to an appropriate member of senior management (i.e., the Vice President, Environmental).

5.4.3 Entergy EHS Policies and Standards are considered Specialized Policies, as defined under the Policy Development and Oversight policy and must satisfy the Policy Development and Oversight policy's criteria specified for the approval of Specialized Policies and on-going requirements related to Specialized Policies.

5.4.4 Employees are required to comply with Entergy EHS Policies and Standards.

5.4.5 Entergy EHS Policies and Standards and revisions to Entergy EHS Policies and Standards shall become effective on the date of approval or on another date specified by the Executive Vice President and Chief Operating Officer or the Executive Vice President and General Counsel or their designees.

5.4.6 Unless otherwise specified in Entergy EHS Policies and Standards:

5.4.6.1 Entergy EHS Policies and Standards take precedence over Functional programs and procedures.

5.4.6.2 Entergy EHS Policies and Standards shall control over Functional programs and procedures in the event of conflicts.

5.5 **Functional Obligations** This Policy requires each Entergy Function to develop, implement, maintain, and regularly evaluate programs and procedures consistent with Entergy EHS Policies and Standards as part of its overall effort to maximize support for Entergy's environmental, occupational health, and safety commitments.

5.6 **Non-Controlled Business Interests** With respect to entities in which the Company has a non-controlling business interest, the responsible Functional Leader or designee shall, in consultation with Enterprise Safety and Sustainability and Environmental Policy, advocate that such entities adopt environmental, occupational health, and safety controls to affect practices that are consistent with this Policy, and, to the extent practicable, will include provisions in the contracts or agreements establishing the business interest that adequately mitigate environmental, occupational health, and safety risks.

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6.0 **PROCEDURES**

6.1 **Posting**

6.1.1 Following approval by the Executive Vice President and Chief Operating Officer, or designee, any new or revised Entergy OH&S Policies and Standards shall be made available to all employees via posting on Entergy's intranet and communicated through agreed upon methods.

6.1.2 Following approval by the Executive Vice President and General Counsel, or designee, any new or revised Entergy Environmental Policies and Standards shall be made available to all employees via posting on Entergy's intranet and communicated through agreed upon methods.

7.0 **ATTACHMENTS**

None.