

**ENTERGY SYSTEM  
POLICIES & PROCEDURES**

Page 1 of 6

Title: ENVIRONMENTAL MANAGEMENT		Last Revision: 1/04/2017	Rev. 2
Subject Matter Expert: Rick Johnson	Responsible Officer: Marcus Brown	Approved By: Corporate Compliance Committee	

## **I. POLICY SUMMARY**

- The purpose of Policy is to set Entergy's policy direction and responsibility surrounding environmental management.
- Entergy Corporation is committed to being recognized as a leader in environmental management by achieving world-class environmental performance in our business operations.
- Entergy Environmental Management System (EMS) Procedures may be created and revised as necessary to manage compliance with environmental laws.
- The Executive Vice President and General Counsel has the authority to approve, interpret, and administer Entergy EMS Procedures.
- Entergy EMS Procedures apply to all Entergy employees.
- Each Entergy function, business, and department shall develop, implement, maintain and regularly evaluate programs and procedures consistent with Entergy EMS Procedures.
- 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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Title: ENVIRONMENTAL MANAGEMENT

Last Revision: 1/04/2017

Rev. 2

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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 management and to set forth the authority to establish, implement, maintain, and administer Entergy EMS Procedures.

**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.**

### **2.0 REFERENCES & CROSS REFERENCES**

#### **2.1 Entergy System Policies & Procedures:**

- Policy Development and Oversight
- Reporting Violations

#### **2.2 Entergy Environmental Management System Procedures:** (found on the Environmental Strategy & Policy SharePoint site or a successor site)

#### **2.3 Questions:** Employees who have questions concerning this Policy or Entergy EMS Procedures may seek guidance from the appropriate Subject Matter Expert or the Environmental Strategy & Policy Department.

Title: ENVIRONMENTAL MANAGEMENT	Last Revision: 1/04/2017	Rev. 2
---------------------------------	--------------------------	--------

### **3.0 DEFINITIONS**

- 3.1 Entergy Environmental Management System (EMS) Procedures:** The policies and procedures implemented by Entergy as Specialized Policies pursuant to Section 5.4 of this Policy to manage compliance with environmental laws.
- 3.2 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.
- 3.3 Policy:** This Environmental Management Policy.
- 3.4 Specialized Policies:** As defined in the Entergy system policy titled Policy Development and Oversight Policy.
- 3.5 Subject Matter Expert (SME):** The Environmental Strategy & Policy Department employee who is the designated authority over an Entergy EMS Procedure.

### **4.0 RESPONSIBILITY**

- 4.1 Employees, agents and contractors** are responsible for:
- Complying with established Entergy EMS Procedures; and
  - Immediately reporting known, suspected, or potential violations of this Policy by following the procedures described in the Reporting Violations Policy.
- 4.2 Environmental Strategy & Policy Department** is responsible for:
- Developing appropriate Entergy EMS Procedures;
  - Administering the review and approval process of Entergy EMS Procedures;
  - Ensuring that the opportunity for prior input and appropriate cross-functional review occurs for each business unit significantly affected by a new or revised Entergy EMS Procedure prior to approval; and
  - Facilitating appropriate change management for new or revised Entergy EMS Procedures.
- 4.3 Executive Vice President and General Counsel** has responsibility for:
- Approving Entergy EMS Procedures and revisions thereto;
  - Designating the SME for each Entergy EMS Procedure; and
  - Interpreting Entergy EMS Procedures, as needed.
- 4.4 Responsible Business Function Executive**, designee, or successor, in consultation with Environmental Strategy & Policy Department, is responsible for ensuring the implementation of environmental controls referenced in this Policy and specified in Entergy EMS Procedures.
- 4.5 Subject Matter Experts** are responsible for:

# ENTERGY SYSTEM POLICIES & PROCEDURES

Page 4 of 6

Title: ENVIRONMENTAL MANAGEMENT	Last Revision: 1/04/2017	Rev. 2
---------------------------------	--------------------------	--------

- Ensuring that applicable Entergy EMS Procedures are kept current, considering emerging laws, regulations, and best business practices; and
- Interpreting the provisions of the Entergy EMS Procedures for which they are responsible, as needed.

**4.6** Vice President, Environmental Strategy & Policy, designee, or successor is responsible for the administration of this Policy.

## **5.0** DETAILS

**5.1** Entergy's Environmental Commitment: Entergy is committed to being recognized as a leader in environmental management by achieving world-class performance in our business operations. Where applicable and appropriate, world-class performance shall be measured by the International Organization for Standardization's 14000 Family of International Standards (ISO 14000), or superseding standards, without the requirement for certification under those programs. Accordingly, Entergy pledges to:

- 5.1.1** Conduct business in a responsible manner by promoting sustainable environmental solutions that build value for our shareholders, minimize risk, reduce environmental impacts from our operations, and contribute to the social well-being of the communities we serve;
- 5.1.2** Integrate environmental management considerations into our strategic and business planning and decision-making;
- 5.1.3** Ensure that our business leaders are held accountable for environmental performance;
- 5.1.4** Meet or exceed applicable environmental legal requirements, addressing the spirit as well as the letter of the law;
- 5.1.5** Engage key stakeholders to anticipate emerging environmental issues, respond to legitimate concerns, and advocate development of sound corporate policy;
- 5.1.6** Share best practices among Entergy business functions to enhance performance; and,
- 5.1.7** Report publicly on our environmental performance.

**5.2** Management System: To implement this pledge and to drive continuous improvement, Entergy will implement an environmental management system that is consistent with world-class standards, as measured by ISO 14000 where applicable and appropriate, or superseding standards, without the requirement for certification under those programs.

**ENTERGY SYSTEM  
POLICIES & PROCEDURES**

Page 5 of 6

Title: ENVIRONMENTAL MANAGEMENT	Last Revision: 1/04/2017	Rev. 2
---------------------------------	--------------------------	--------

- 5.3 Compliance with Environmental Laws and Regulations:**
- 5.3.1** Entergy requires employees, agents and contractors to comply with applicable environmental laws and regulations.
  - 5.3.2** Entergy EMS Procedures (see Section 5.4 below) may be created and revised as necessary to manage and facilitate compliance with applicable environmental laws and regulations.
- 5.4 Entergy Environmental Management System (EMS) Procedures:**
- 5.4.1** The Executive Vice President and General Counsel has the authority to approve new Entergy EMS Procedures and approve revisions to existing Entergy EMS Procedures.
  - 5.4.2** Entergy EMS Procedures are considered Specialized Policies, as defined under the Policy Development and Oversight system 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 such policies.
  - 5.4.3** Employees are required to comply with Entergy EMS Procedures.
  - 5.4.4** New Entergy EMS Procedures and revisions to existing Entergy EMS Procedures shall become effective on the date of approval or on another date specified by the Executive Vice President and General Counsel.
  - 5.4.5** Unless otherwise specified in an Entergy EMS Procedure:
    - 5.4.5.1** The Entergy EMS Procedure takes precedence over business-unit or departmental policies, and
    - 5.4.5.2** The Entergy EMS Procedure will control over business-unit or departmental policies in the event of conflicts.
- 5.5 Business Function, Businesses, and Departmental Obligations:** This Policy requires each Entergy business function to develop, implement, maintain and regularly evaluate programs and procedures consistent with the Entergy EMS Procedures as part of its overall effort to maximize support for Entergy's environmental commitments.
- 5.6 Non-Controlled Business Interests:** With respect to entities in which the Company has a non-controlling business interest, the responsible business function executive or designee shall, in consultation with Environmental Strategy & Policy, advocate that such entities adopt environmental controls to effect 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 risks.

# ENTERGY SYSTEM POLICIES & PROCEDURES

Page 6 of 6

Title: ENVIRONMENTAL MANAGEMENT	Last Revision: 1/04/2017	Rev. 2
---------------------------------	--------------------------	--------

## 6.0 **PROCEDURES**

6.1 **Posting**: Following approval by the Executive Vice President and General Counsel, any new or revised Entergy EMS Procedure shall be made available to all employees via posting on Entergy's intranet.

## 7.0 **ATTACHMENTS**

None.