

Appendix 1: Environmental and Social Action Plan (ESAP)

No.	Reference	Measure	Final product/deliverable	Expected completion date
PS 1: Assessment and management of environmental and social risks and impacts				
1.1	Environmental and Social Management System	<ol style="list-style-type: none"> Evaluate the Sustainability Management System (SMS) based on the Implementation Manual and the IFC Toolkit Strengthen/update the final SMS, explicit, detailed and specific to Caribe Hospitality ("CH"), including: (i) policies; (ii) procedures to identify, evaluate and manage the potential environmental, social, OHS and labor risks and impacts associated with each Project activity, as well as for its contractors and subcontractors; (iii) internal procedures for compliance with the environmental and social management plan (ESMP); (iv) organizational capacity and competence, with definition of roles and assignment of responsibilities for the implementation of this ESMS; (v) protocols for emergency preparedness and response; (vi) methods or plans for the participation of key stakeholders; (vii) mechanisms for external communications and receipt of complaints; (ix) protocols for the dissemination of information to communities, decision-making and training; (x) protocols for the evaluation and continuous improvement of the ESMS; and (xi) periodic audits and inspections with respect to applicable environmental, social and OHS requirements under Costa Rica's environmental and social laws. 	<ol style="list-style-type: none"> SMS evaluation report Copy of CH's updated SMS 	<ol style="list-style-type: none"> Four months after the first disbursement. Six months after the first disbursement.
1.2	Environmental, Social and Occupational Health and Safety Policy	<ol style="list-style-type: none"> Strengthen the sustainability policy (environmental and social policy), considering the context and needs of CH and/or the Project; as well as designating who, within the organization, will guarantee compliance with the policy and be responsible for its execution. 	<ol style="list-style-type: none"> Copy of the sustainability policy of CH or the Project (if different) and designation of the person responsible for compliance and execution 	<ol style="list-style-type: none"> Six months after the first disbursement.

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		2. Complement this sustainability policy with follow-up programs and communications to all members and levels of the organization.	2. Evidence of the implementation of monitoring programs and communications to all members and levels of the organization	2. Six months after the first disbursement.
		3. Create a mechanism to measure permanent improvements in the implementation of environmental and social policies; as well as CH's OHS policy.	3. Permanent improvement mechanism	3. Six months after the first disbursement.
1.3	Environmental and Social Management Programs (ESMP)	1. Complement the specific ESMP of the Fairfield Alajuela Hotel for the Construction and Start-Up stage (C&S), with the following: (i) Safety, Occupational Health and Environment Monitoring Procedure (SOHE); (ii) Runoff Pollution Prevention Plan (RPPP); (iii) solid waste management plan; (iv) Sewage and liquid waste management plan; (v) Chemical products safe management plan (may be included in the Project's Occupational Health and Safety Plan); (vi) Emergency response plan; (vii) Worksite occupational safety plan; and (viii) Road safety and control plan.	1. Copy of the specific ESMP for the Fairfield Alajuela Hotel, updated for the C&S stage.	1. 30 days before beginning construction of the Fairfield Alajuela Hotel.
		2. Develop a PGAS for the operation and maintenance (O&M) of the Fairfield Alajuela Hotel, which includes the following: (i) Procedure for Carbon Neutral Management; (ii) LEED commitment implementation and follow-up plan; (iii) Plan for the rational use of energy; (iv) Solid waste management plan (operation); (v) Water conservation plan; (vi) Plan to preserve indoor air quality in the buildings; (vii) Refrigerant management plan; (ix) Carbon Neutral Management Plan; (x) Emergency response plan; and (xi) Occupational safety plan	2. Copy of the specific ESMP of the Fairfield Alajuela Hotel, updated for O&M.	2. 30 days before the Fairfield Alajuela Hotel's operation.
1.4	Organizational Capacity	1. Designate the Occupational Health Commissions for the construction and start-up stage (C&S) of the Fairfield Alajuela Hotel.	1. Appointment of the Occupational Health Commissions for the	1. 30 days before beginning construction of

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			Fairfield Alajuela Hotel's C&S.	the Fairfield Alajuela Hotel.
		2. Appoint the Occupational Health Commissions for the O&M of the Fairfield Alajuela Hotel.	2. Appointment of the Occupational Health Commissions for the Fairfield Alajuela Hotel's O&M.	2. 30 days before the Fairfield Alajuela Hotel's operation.
		3. Designate and maintain a qualified Environmental or Sustainability Manager (or similar position) and a qualified OS Manager (or similar position) for CH, who will report directly to the Project Manager/Director, with independent reporting lines in relation to the Corporate Management or General Management of CH.	3. Designation of CH staff responsible for the environmental, social and OS performance of the Hotels	3. 60 days after signing the loan agreement.
1.5	Emergency Preparedness and Response	1. Strengthen and update the Emergency Plan for the Fairfield Alajuela Hotel's C&S stage, including: (i) specific emergency response procedures; (ii) trained emergency response teams; (iii) emergency contacts and communication systems/protocols; (iv) procedures for interaction with local and regional emergency and health authorities; (v) permanent emergency equipment and facilities (e.g., first aid stations, extinguishers/hoses, sprinkler systems); (vi) protocols for firefighters, ambulances and other emergency vehicle services; (vii) evacuation routes and meeting points for the Hotel and the entire horizontal condominium; (viii) training exercises such as annual drills or more frequently if necessary, or actual events in which CH, together with the Contractor (V&T), should include nearby residential and/or commercial properties and other key stakeholders to familiarize them with proper procedures in the event of an emergency	1. Copy of the strengthened and updated Emergency Plan for the Fairfield Alajuela Hotel's C&S	1. 30 days before beginning construction of the Fairfield Alajuela Hotel.
		2. Develop the Local Crisis Management Plan, detailed and specific to the Fairfield Alajuela Hotel's O&M, in order to minimize the risks for employees in the event of natural	2. Copy of the Local Crisis Management Plan, detailed and	2. 30 days before the Fairfield

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		disasters or technological hazards, with the contact information of the relevant or appropriate third party collaborators.	specific to the Fairfield Alajuela Hotel's O&M	Alajuela Hotel's operation.
1.6	Monitoring and evaluation indicators	1. Develop a compliance matrix with a set of key performance indicators that should be monitored and met in order to measure the effectiveness of the ESMP and compliance with all environmental, labor, OS, legal and contractual obligations of the Fairfield Alajuela Hotel during the construction and O&M stages.	1. Compliance matrix with the list of key management performance and success indicators	1. 45 days after signing the loan agreement.
		2. Implement a Project permit matrix for all stages of the Project, including: preliminary land evaluation studies; site design; pre-construction studies/permits; building permits; and operating permits. This permit Matrix must include: (i) the competent Authority that gives the authorization or issues the permit/license; (ii) dates of issuance and validity; (iii) the person in charge at CH for monitoring/compliance; and (iv) future communication and compliance procedures	2. Project Permit Matrix, for all stages of the Project	2. 45 days after signing the loan agreement.
		3. Strengthen the WWTP Wastewater Discharge Monitoring Program in terms of compliance with local regulations and IFC guidelines on environment, health and safety for water and sanitation (whichever is more rigorous); accompanied by new training campaigns, the establishment of a mechanism for penalties/rewards and/or improvement in the management of wastewater at the Fairfield Alajuela Hotel.	3. Copy of Fairfield Alajuela Hotel's WWTP Wastewater Discharge Monitoring Program	3. 30 days before beginning operation of the WWTP.
1.7	Project Compliance with applicable regulations	1. Through an independent environmental and social consultant, prepare a consolidated report on all environmental, social, health, and safety issues, as well as on the compliance status of the CII's Environmental Sustainability Policy, the Environmental, Social and OHS legislation of Costa Rica, IDB's Environmental and Social Policies, and the IFC's Performance Standards, including the progress of SMS actions against established key performance indicators.	1. Periodic environmental and social compliance report	1. Annually over the life of the loan

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1.8	Participation of Social Actors	1. Prepare a Communal Relations Procedure for the Fairfield Alajuela Hotel, for both the construction and start-up (C&S) and O&M stages, in which for the latter, the lessons learned during the C&S stage are integrated. This Procedure should include the following: (i) updated identification of all stakeholders, including local authorities and surrounding communities (within a 1 km radius or adjacent to the Hotel's access roads) that may be interested in the Project; (ii) differentiated measures to enable the effective participation of disadvantaged or vulnerable groups; (iii) a mechanism to ensure that community representatives represent the views of affected communities; (iv) details on how information is disseminated to stakeholders; (v) details on the participatory process among affected communities and how the complaints mechanism can be accessed.	1. Copy of Fairfield Alajuela Hotel's Community Relations Procedure.	1. 30 days before beginning construction of the Fairfield Alajuela Hotel.
PS 2: Work and Labor conditions				
2.1	Human Resources Policies and Procedures	1. Adapt CH's human resources policies and procedures to comply with PS-2, including, among other things, the promotion of gender equality and non-discrimination, equal opportunities, fair treatment, agreement with appropriate terms and conditions of employment, notice of dismissal and compensation, based on its Code of Conduct for employees.	1. Copy of CH's human resources policies and procedures	1. 60 days after signing the loan agreement.
		2. Develop a control and monitoring mechanism to ensure that contractors and subcontractors of engineering, procurement and construction services comply with such human resources policy and procedures.	2. Copy of the control and follow-up mechanism for compliance with the human resources policy and its procedures	2. 60 days after signing the loan agreement.

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2.2	Workforce Protection	1. Adapt the Internal Labor Regulation to comply with PS-2, including: (i) an employment procedure for own workers and those hired by third parties, in which the conditions for hiring and firing are in accordance with local and International Labour Organization ("ILO") regulations, including, as a minimum, standards to prevent child and forced labor; (ii) procedures for hiring and dismissing/reducing own jobs and those procedures adopted by contractors for their workers; and (iii) procedures for managing and monitoring the performance of own workers and third-party workers	1. Copy of the Internal Labor Regulation, updating these procedures for CH	1. 60 days after signing the loan agreement.
2.3	Coexistence Handbook	1. Provide a coexistence handbook (regulations) for Project employees, contractors and subcontractors.	1. Copy of the Project's coexistence manual (regulation).	1. 60 days after signing the loan agreement.
2.4	Associate Handbook	2. Prepare the Associate Manual for the Fairfield Alajuela Hotel's O&M, complying with Costa Rica's labor legislation and the requirements of PS-2	2. Copy of the associate manual for the Fairfield Alajuela Hotel's O&M	2. Three months after the Fairfield Alajuela Hotel's start of operations
2.5	Occupational Health and Safety	1. Develop and implement the Occupational Safety Plan for the Fairfield Alajuela Hotel's operation.	1. Copy of the Occupational Safety Plan for the Fairfield Alajuela Hotel's operation	1. 30 days before the Fairfield Alajuela Hotel's operation.
2.6	Internal complaints mechanism for the construction stage	1. Develop and implement an internal complaints mechanism focused on direct employees, contractors and subcontractors for the Fairfield Alajuela Hotel's construction stage. The complaints mechanism shall include details on how complaints or grievances are registered, investigated, and evaluated, and their follow-up and closure or resolution process.	1. Copies of the internal complaints mechanism for the Fairfield Alajuela Hotel's C&S stage	1. 30 days before beginning construction of the Fairfield Alajuela Hotel.
			2. Copies of evidence of their implementation during the Fairfield	2. Progress report in each environmental and social

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			Alajuela Hotel's C&S stage	compliance report.
2.7	Internal complaints mechanism for operation and maintenance (O&M)	1. Provide an internal complaints mechanism for O&M that incorporates the experiences and lessons learned during the C&S stage.	1. Copies of the internal complaints mechanism for the Fairfield Alajuela Hotel's O&M	1. 30 days before the Fairfield Alajuela Hotel's operation.
			2. Copies of evidence of its implementation during the Fairfield Alajuela Hotel's O&M	2. Progress report in each environmental and social compliance report.
PS 4: Community Health and Safety				
4.1	Community Health and Safety	1. Adapt the Road Management Plan, to include comprehensive road safety management, specific to the Fairfield Alajuela Hotel, detailing access and exit routes for the transportation of building materials, schedules, and operation restrictions, including the mitigation of potential impacts on affected communities, especially during the construction stage of the project. It should also include an analysis for the initial operation stage and the expected vehicle traffic that the Hotel will attract.	1. Copy of the Road Management Plan, updated for the Fairfield Alajuela Hotel	1. 30 days before beginning construction of the Fairfield Alajuela Hotel