

Annex 1: Project Tropicalia Sustainable Tourism, Dominican Republic

Environmental and Social Action Plan (ESAP)

| Item No. | Reference | Action Item | Product/Deliverable | Anticipated Completion Date |
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| PS 1: Assessment and Management of Environmental and Social Risks and Impacts | | | | |
| 1.1 | Environmental and Social Management System (ESMS) | 1. Provide a copy of the final ESMS, explicit, detailed and specific for Inversiones Cuatro Estaciones, S.A.S., or the Four Seasons Hotel project, that includes: i) the organizational structure, including the roles and responsibilities of the environmental and social, and industrial and occupational health and safety, departments; ii) the profiles of the personnel in each department (contracted and yet to be contracted); iii) details of how the system is implemented for the project; iv) protocols for information management; v) protocols for decision making; vi) protocols for the control and monitoring of the implementation of the environmental management actions of the ESMS; vii) protocols for the evaluation and continuous improvement of the system; and viii) protocols to ensure the fulfilment of the implementation of the social, environmental, industrial safety and occupational health plans (SISO), by the contractors and sub-contractors.. | 1. Copy of the final ESMS for Inversiones Cuatro Estaciones, S.A.S., or the Four Seasons Hotel project, if different. | 1. Before the first disbursement. |
| 1.2 | ESHS Policy | 1. Provide an Environmental, Social, Health and Safety (ESHS) overarching policy, taking into consideration the context and needs of the project. | 1. Copy of ESHS policy for Inversiones Cuatro Estaciones, S.A.S., or the Four Seasons Hotel project, if different. | 1. Before the first disbursement. |
| | | 2. Inversiones Cuatro Estaciones, S.A.S should complement its policy with communications and monitoring programs to all members and levels of its organization. | 2. Evidence of implementation of the communications and monitoring programs to all members and levels of the organization. | 2. Before the first disbursement. |

| Item No. | Reference | Action Item | Product/Deliverable | Anticipated Completion Date |
|----------|--|---|--|---|
| | | 3. Create a mechanism to measure continuous improvement in policy implementation | 3. Mechanism of continuous improvement. | 3. Before the first disbursement. |
| 1.3 | Identification and evaluation of environmental and social, risks and impacts | <p>1. Provide an updated/modified DIA for the Four Seasons Hotel Project and any environmental license issued by MIMARENA in the case of additional infrastructure not currently considered in the previous Four Seasons DIA and Tropicalia EIA, with the following maps of the project's direct impact area footprint (hotel, service area, utility compound and associated infrastructure, general access and service roads, location of water withdrawal wells, etc.), overlapping: a) The boundaries of the protected areas and their buffer zones, as per Law No. 202-04 and Resolution No. 04/2012; b) Property boundaries of the parcels that make up the Four Seasons project property and its supporting infrastructure; c) The 60 m buffer required by Dominican Law from the high tide mark on the beach and the costal dune zones, as requested by the Environmental Permit No. 3060-16; d) Proposed access routes from Highway 104, and its road dimensions/characteristics and right of way.</p> <p>2. Continuous update of the environmental and social risk matrix, for each project phase.</p> | <p>1. Copies of the updated/modified DIA for the Four Seasons Hotel Project and any environmental license issued by MIMARENA for additional infrastructure, with its new maps.</p> <p>2. Copy of the updated environmental and social risk matrix.</p> | <p>1. 30 days before the start of the construction phase.</p> <p>2. A progress report in each biannual Environmental Compliance Report (ICA).</p> |
| 1.4 | Management of Hydrological Balance | 1. Develop a Hydrological Balance Study to determine the impact of the project's water demand and the future Phase II works of the Tropicalia Eco Resort Tourism Project, on the balance of the Laguna Redonda and Limón PAs hydrological system and the water bodies and wetlands in its surroundings. Such a study should include: i) The Impact Mitigation Plan to ensure the sustainability of wetland and water ecosystems; and ii) The Monitoring Plan for mitigation | 1. Copy of the Hydrological Balance Study, and its mitigation and monitoring plans. | 1. 30 days before the start of operations. |

| Item No. | Reference | Action Item | Product/Deliverable | Anticipated Completion Date |
|----------|---|--|---|--|
| | | measures, together with their environmental performance indicators. | | |
| 1.5 | Cumulative impacts | 1. Prepare a Cumulative Impact Study of all the infrastructure of Phases I and II of the Tropicalia Eco Resort project, in accordance with its updated layout and using as a reference IFC guidance. The study will include: i) a list of all the significant works that will be developed in the area of influence of the project together with the corresponding analysis, that justify their inclusion or exclusion in/from the cumulative impact study; ii) the justification of the Valued Environmental and Social components (VECs) to be considered in the analysis, especially on those natural habitats, like: wetlands, mangroves, turtle and bird nesting sites, drago flooded forest etc.; iii) the determination of the additional impact that each works to be considered will generate, to ensure no net loss of biodiversity in the total Project's area of influence, based on baseline metric indicators, in particular restricted-range endemics and endangered IUCN red-listed species; and iv) the environmental mitigation plan to manage the cumulative impacts, and a Biodiversity Action Plan (BAP) for the Project's area of influence. | 1. Cumulative Impact Study of all the infrastructure of Phases I and II of the Tropicalia Eco Resort project. | 1. 30 days before the last disbursement. |
| 1.6 | Permits and preventive measures of suspension | 1. Provide an updated matrix of legal permits and certifications associated with ESHS issues handled by suppliers of the Project, which includes authorizing governmental entity, dates, responsible party or organizational chart and communications and compliance procedures. | 1. Copy of the updated matrix of legal permits and certifications of the Project. | 1. Before the first disbursement. |
| 1.7 | Third Parties E&S Management Plans | 1. The EMP of its main contractors, and their commitment mechanism and/or contractual bonds to comply with Four Seasons Hotel EMP (or ESMS provided in 1.1), for both the construction and operation phase. This EMP could include the SMP and HSE plans on a single consolidated document or | 1. Copy of the EMP of its main contractors, for the construction phase. | 1. 30 days before the start of the construction phase. |
| | | | 2. Copy of the EMP of its main contractors, for the operation phase. | 2. 30 days before the start of the operation phase. |

| Item No. | Reference | Action Item | Product/Deliverable | Anticipated Completion Date |
|----------|--|--|--|---|
| | | else, these SMP and HSE plans, should be presented separately, for both the construction and operation phase. | | |
| 1.8 | Emergency Preparedness and Response | 3. Provide an updated Contingency Plan (emergency preparedness and response plan), to minimize risk to employees and guests in the case of natural disasters or technological danger, with the contact information of the appropriate and relevant collaborative third parties. | 3. Updated Contingency Plan | 2. Before the first disbursement. |
| 1.9 | Monitoring and evaluation indicators | 1. Develop, or in case they already exist, provide details of the indicators to be monitored and met, in order to measure the effectiveness of the environmental and social management plan, as well as reference to all legal and contractual obligations during the construction and operations phases. | 1. List of management and success indicators. | 1. Before the first disbursement. |
| 1.10 | Project Compliance with Applicable Standards | 1. Through an Independent Environmental and Social Consultant (IESC), periodically prepare a consolidated report covering environmental, social, health and safety issues and work to provide a status of compliance with the Environmental Sustainability Policy of the IIC, legislation of the Dominican Republic, IDB Environmental and Social Policies, and IFC Performance Standards, including the progress of DIA PMAA's actions, with respect to established indicators. | 1. Periodic environmental and social compliance report. | 1. Semi-annual during the construction phase and annually onward during the loan term. |
| 1.11 | Stakeholder Engagement Plan for the construction phase | 1. Provide a copy of the Stakeholder Engagement Plan for the construction phase as well as evidence of its implementation. This plan will contemplate ample participation of municipal authorities, key stakeholders and the community in general of the Miches municipality and its district, in order to present updated and comprehensive information for the construction phase of the project. This Plan should include an estimate of jobs created in the construction and operation phases that may be occupied by people from the Municipality of Miches; as well as training programs that would be implemented to maximize local participation in the hotel's workforce. Participants should be able to receive answers to their | 1. Copy of the Stakeholder Engagement Plan for the construction phase. | 1. 30 days before the start of the construction phase. |
| | | | 2. Copy of the evidence of its implementation. | 2. 15 days before the start of the construction phase and subsequently a progress report in each biannual Environmental Compliance Report |

| Item No. | Reference | Action Item | Product/Deliverable | Anticipated Completion Date |
|---|---|---|---|--|
| | | questions and have access to public information regarding the project. They should also be informed of the Grievance Mechanism and how they can access it. | | (ICA), during the construction phase. |
| 1.12 | Stakeholder Engagement Plan for the Operation Phase | 1. Update Stakeholder Engagement Plan for the operation phase, which should integrate lessons learned from the construction phase. | 1. Copy of the updated Stakeholder Engagement Plan for the operation phase. | 1. 90 days before the start of the operation. |
| 1.13 | Grievance Mechanism for the construction phase | 1. Provide: i) copies of the internal (direct workers, contractors and sub-contractors) and external Grievance Mechanism (communities and/or owners within the indirect area of influence, with potential impact or interest) for the construction phase; and ii) copies of the evidences of its implementation. This grievance mechanism should include details of how these complaints are recorded, investigated / evaluated and the follow-up and closure / resolution process. | 1. Copies of the Internal and External Grievance Mechanism for the construction phase | 1. 30 days before the start of the construction phase. |
| | | | 2. Copies of the evidences of its implementation | 2. Progress report in each biannual Environmental Compliance Report (ICA). |
| 1.14 | Grievance Mechanism for the operation phase | 1. Provide a similar internal and external Grievance Mechanism (as of the one for construction), for operation. | 1. Copies of the Internal and External Grievance Mechanism for operation | 1. 90 days before start of operation. |
| PS 2: Labor and Working Conditions | | | | |
| 2.1 | Human Resource Policies and Procedures | 1. Provide human resource policies and procedures of Inversiones Cuatro Estaciones, S.A.S. and of the Project, if different. | 1. Copy of the human resource policies and procedures. | 1. Before the first disbursement. |
| | | 2. Develop and implement a policy of gender equality, equal opportunity, non-discrimination including indicators to measure the results of the policy's implementation so as to guarantee that the Project will not discriminate against workers in any aspect of employment relations (principal of equal opportunity and fair treatment) and/or due to his/her gender and that both men and women are benefitting from the positive impacts of the Project. | 2. Copy of the policy of gender equality, equal opportunity, non-discrimination. | 2. Before the first disbursement. |

| Item No. | Reference | Action Item | Product/Deliverable | Anticipated Completion Date |
|----------|----------------------------------|--|---|--|
| 2.2 | Workers Engaged by Third Parties | 1. Provide the policies and procedures for the management and monitoring of the performance of workers hired by third parties. | 1. Copy of these policies and procedures. | 1. Before the first disbursement. |
| | | 2. Provide the procedures adopted by the contractors for the hiring and disengagement/retrenchment, of their workers. | 2. Copy of these procedures. | 2. 30 days before the start of the construction phase. |
| 2.3 | Protecting the Workforce | 1. Provide an Employment Procedure and evidence of its implementation, in which the hiring and firing conditions and terms, will meet the local and OIT regulation; including, at a minimum, norms/safeguards to avoid child labor and forced labor. | 1. Copy of the employment procedure. | 1. Before the first disbursement. |
| | | | 2. Copies of the evidences of its implementation. | 2. Progress report in each biannual Environmental Compliance Report (ICA). |
| 2.4 | Coexistence Manual | 1. Provide a coexistence manual (rulebook) for workers, contractors and sub-contractors, of the project. | 1. Copy of the coexistence manual (rulebook) for workers, contractors and sub-contractors | 1. Before the first disbursement. |
| 2.5 | Occupational Health and Safety | 1. Provide details of the mechanisms the Client and its contractors need to implement to guarantee a secure working environment and to reduce physical, biological and chemical risks associated with the construction phase of the project and evidence of its implementation. This information will include: i) the identification of possible risks to the health and safety of the workers according to the job that they do; ii) details of the preventative and protective measures implemented, worker trainings, and daily safety briefings mentioned during the site visit and iii) a copy of the reports developed in the event of an incident or occupational accident. | 1. Copy of the occupational health and safety, for the construction phase. | 1. 30 days before the start of the construction phase. |
| | | | 2. Copies of the evidences of its implementation. | 2. Progress report in each biannual Environmental Compliance Report (ICA). |
| 2.6 | Accidents and fatalities | 1. Report any major accidents, including fatalities. | 1. Notification of major accidents. | 1. Within 24 hours of the occurrence of the accident. |

| Item No. | Reference | Action Item | Product/Deliverable | Anticipated Completion Date |
|---|--|--|--|--|
| | | 2. Prepare a root cause analysis and ensure the closure of corrective actions. | 2. Copy of the Cause Analysis and closure. | 2. Periodic environmental and social compliance report (ref 1.10). |
| 2.7 | Supply Chain | 1. Provide the policies and procedures for the management and monitoring of the performance, in its primary supply chain | 1. Copy of these policies and procedures. | 1. 30 days before the start of the construction phase. |
| PS 3: Resource Efficiency and Pollution Prevention | | | | |
| 3.1 | Efficiency in water consumption | 1. Provide a water efficiency strategy for the project (analysis of demand, frequency, types of use, measures for efficient use and monitoring). This should include a comparative analysis with water demand from other hotels in the country and region plus evidence of its implementation. | 1. Copy of the water efficiency strategy. | 1. Before the first disbursement. |
| | | | 2. Copies of the evidence of its implementation. | 2. Progress report in each biannual Environmental Compliance Report (ICA). |
| 3.2 | Hazardous Material Management | 1. Provide a Hazardous Material Management Plan for both the construction and operation phases of the project. | 1. Copy of the protocols for the management and disposal of hazardous waste during construction. | 1. 30 days before the start of the construction phase. |
| | | | 2. Copy of the protocols for the management and disposal of hazardous waste during operations | 2. 30 days before the start of operation. |
| 3.3 | Greenhouse Gases (GHG) | 1. Provide an updated inventory of GHG emission sources, following international best practices, and a study that quantifies the potential GHG emissions for the construction and operational phases of the project, together with recommendations and a plan to reduce them. | 1. Copy of the updated inventory of GHG and the resulting quantification of GHG emissions. | 1. Before the first disbursement. |
| 3.4 | Use of renewable energy during the operating phase | 1. Provide a feasibility study to maximize the projects use of renewable energy during the operational phase, which includes: i) the estimated energy consumption for the project; | 1. Copy of the feasibility study to maximize the projects use of renewable energy. | 1. 90 days before the start of operation |

| Item No. | Reference | Action Item | Product/Deliverable | Anticipated Completion Date |
|----------|---------------------------------------|---|--|--|
| | | ii) list the actions that will be taken to minimize consumption; and iii) maximize use of renewable energy sources. | | |
| 3.5 | Air Emissions and Ambient Air Quality | 1. Provide a plan for the control of atmospheric emissions and air quality, which includes the air mitigation measures as well as the implementation procedures. | 1. Copy of the plan for atmospheric emissions and air quality. | 1. 30 days before the start of construction |
| | | | 2. Copies of the evidences of its implementation. | 2. Progress report in each biannual Environmental Compliance Report (ICA). |
| 3.6 | Waste Management | 1. Provide an updated waste management and disposal strategy and protocol for common wastes as required by the applicable legal framework, as well as evidence of the implementation of the protocol. This strategy should include the details of the waste management firm accredited by MIMARENA, during both the construction and operation phase. | 1. Copy of the updated waste management and disposal strategy, for the construction phase. | 1. 30 days before the start of the construction phase. |
| | | | 2. Copies of the evidences of its implementation. | 2. Progress report in each biannual Environmental Compliance Report (ICA). |
| | | | 3. Copy of the updated waste management and disposal strategy, during operation. | 3. 60 days before the start of operation. |
| | | | 4. Copies of the evidences of its implementation. | 4. Progress report in each biannual Environmental Compliance Report (ICA). |
| 3.7 | Pesticide Use and Management | 1. Formulate and implement an Integrated Pest Management (IPM) and/or Integrated Vector Management (IVM) approach for pest management activities. This IPM and IVM approach will entail coordinated use of pest and environmental information along with available pest control methods, | 1. Copy of the Integrated Pest Management (IPM) and/or Integrated Vector Management (IVM). | 1. 30 days before the start of the construction phase. |

| Item No. | Reference | Action Item | Product/Deliverable | Anticipated Completion Date |
|---|--|---|---|---|
| | | including cultural practices, biological, genetic and, as a last resort, chemical means to prevent unacceptable levels of pest damage | | |
| PS 4: Community Health, Safety, and Security | | | | |
| 4.1 | Community Health and Safety | 1. Provide a Program for the Management of Roads Traffic Impacts, that should include measures of mitigation of the potential impacts on affected communities, especially during the construction phase, but also including the operation phase and its vehicular composition. | 1. Copy of the Program for the Management of Roads Traffic Impacts. | 1. Before the first disbursement. |
| 4.2 | Emergency Preparedness and Response (EPRP) | 1. Develop a site specific and final EPRP, in which the contacts (name, telephone number, address, etc.) of the main emergency response agencies should be provided. | 1. Copy of the specific and final EPRP. | 1. 30 days before the start of the construction phase. |
| | | 2. Provide a quantitative analysis of risks to local communities during the operational phase. | 2. Copy of the analysis and the identified mitigation measures. | 2. 60 days before the completion of the construction phase. |
| | | 3. Develop and implement an EPRP for the operation phase that includes local communities. | 3. Copy of the EPRP for the operation phase. | 3. 60 days before the completion of the construction phase. |
| | | 4. Provide the results of the monitoring of migratory pressure and options to mitigate impacts to local communities. | 4. Copy of the results of the monitoring of migratory pressure | 4. Before the first disbursement. |
| 4.3 | External security policy and protocols | 1. Provide copy of the contract between Inversiones Cuatro Estaciones, S.A.S. and the security company or companies to verify, among other aspects, that provisions have been included that permit the client, to: i) carry out reasonable investigations to ensure that security personnel do not have police records, or have been implicated in previous cases of abuse; ii) details of required training regarding use of force; iii) restrictions in the use of firearms; and iv) details of training in environmental awareness . | 1. Copy of the contract between Inversiones Cuatro Estaciones, S.A.S. and the security company or companies | 1. 30 days before the start of the construction phase. |

| Item No. | Reference | Action Item | Product/Deliverable | Anticipated Completion Date |
|---|-----------------------------------|---|---|-----------------------------------|
| PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources | | | | |
| 6.1 | Compensation Areas | 1. Develop a Land Compensation Plan, that determines a nearby compensation area for recovery by transplanting the endemic and red-listed species that need to be removed from the Four Seasons hotel site to facilitate construction, that includes: i) its characterization and connectivity with the proposed wetland RAMSAR site and Laguna Redonda PA; ii) develop the corresponding management plan; and iii) a risk analysis of land acquisition. This area needs to be identified on a map and a plan prepared for its revegetation and the transplantation of critical species from the Four Seasons site and for follow up management to ensure its wellbeing. | 1. Land compensation plan, including zero net loss of natural habitats and net gains for critical habitats (if any are identified). | 1. Before the first disbursement. |
| 6.2 | Control of Invasive Alien Species | 1. Develop a Plan to Control and Eradicate Invasive Alien Species known to be present in the areas of the project and its area of influence. These include for example: Almendra (<i>Terminalia catappa</i>), Mozambique Tilapia and Lionfish. The plan will include control and monitoring as well as notifications to the relevant authorities and evidence of the plan's implementation. | 1. Copy of the Plan to Control and Eradicate Invasive Alien Species. | 1. Before the first disbursement. |
| 6.3 | Supply Chain | 1. Provide a system and verification practice for primary suppliers, that: i) provide for an ongoing review of the client's primary supply chains; ii) limit procurement to those suppliers that can demonstrate that they are not contributing to significant conversion of natural and/or critical habitats (this may be demonstrated by delivery of certified product, or progress towards verification or certification under a credible scheme in certain commodities and/or locations); and, iii) where possible, require actions to shift the client's primary supply chain over time to suppliers that can demonstrate that they are not significantly adversely impacting these areas. | 1. Copy of the System and Verification practice to evaluate the client primary suppliers | 1. Before the first disbursement. |