

Shangri-la UB (IFC Project #28546) - Environmental and Social Action Plan (ESAP)

Action	Completion Indicators	Due Date
PS1: Social and Environmental Assessment and Management Systems		
<p><u>1. Establish E&S management system</u> 1.1 The Sponsor will ensure that the appointed SLUB hotel operational team develops and implements the hotel's operational policies and procedures (SLUB's E&S Management System or "ESMS") in accordance with the Sponsor's global corporate social responsibility policies and in fulfillment of national requirements and IFC's performance standard requirements. The ESMS will clearly define E&S roles and responsibilities among operational team members.</p> <p>1.2 The Sponsor will attain HACCP (Hazard Analysis and Critical Control Point System) food-hygiene management certification and ISO14001 environmental management certification for the SLUB hotel one year after hotel opening.</p>	<p>1.1a E&S management system outline acceptable to IFC. 1.1b E&S management system policies and procedures acceptable to IFC, with roles and responsibilities clearly defined.</p> <p>1.2 HACCP and ISO14001 certificates in place.</p>	<p>1.1a Nine months before start of hotel operations. 1.1b Six months before start of hotel operations.</p> <p>1.2 One year after commercial opening of the hotel.</p>
<p><u>2. Fulfill all Environmental Impact Assessment actions</u> The Sponsor will ensure fulfillment of all required actions detailed in the Project's Environmental Impact Assessment ("EIA"), pertaining to both construction and operational phases of the SLUB hotel. It will do so by commissioning an independent consultant to perform environmental verification audits.</p>	<p>(i) Independent environmental audit results confirm that all construction-phase EIA-required actions have been fulfilled. (ii) Independent environmental audit results confirm all operational-phase EIA-required actions have been fulfilled.</p>	<p>(i) According to timetables stipulated in the EIA and within 30 days after construction completion at the latest. (ii) According to timetables stipulated in the EIA and within 9 months from hotel opening.</p>
PS2: Labor and Working Conditions		
<p><u>3. Employment contract in place for all sub-contractor workers</u> SLUB and MCSP will verify that all sub-contractor workers have a formal employment contract in place.</p>	<p>Provide to IFC a list of all sub-contractor workers with samples of actual employment contracts.</p>	<p>Condition of First Disbursement (COD-1st)</p>
<p><u>4. Working hours</u> SLUB will ensure contractor and sub-contractors abide by working hour and other provisions stipulated under the National Labor Law.</p>	<p>Working hour records indicate compliance.</p>	<p>First disbursement + 30 days</p>
<p><u>5. Develop operational human resource policy and employee manual</u> SLUB will develop a detailed operational human resource (HR) policy and employee manual consistent with national and IFC performance standard requirements and with the Sponsor's corporate social responsibility policies.</p>	<p>5.1a Outline of SLUB hotel HR policy and employee manual, referencing HR manuals of another SL hotel as appropriate. 5.1b SLUB hotel HR policy and employee manual approved by the Sponsor.</p>	<p>5.1a COD-2nd 5.1b One month before recruitment for hotel operation</p>
PS3: Pollution Prevention and Abatement		
<p><u>6. Water and energy efficiency</u> The Sponsor will commission water and energy efficiency audits at the SLUB hotel by qualified resource efficiency professionals. The audits will recommend actions to achieve further resource savings to the extent feasible, and will indicate expected resource savings from implementing those actions. The Sponsor will implement audit-recommended actions.</p>	<p>Copies of following to IFC: (i) Initial design assessment recommending construction-phase modifications to realize resource savings to the extent possible (ii) Final water and energy audit reports (iii) Implementation status report</p>	<p>(i) First disbursement + 30 days (ii) Within 1 year from commercial opening of the hotel (iii) To be included in the first Annual Monitoring Report submitted to IFC</p>
PS4: Community Health, Safety and Security		

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<p><u>7. Life and fire safety (L&FS)</u> 7.1 The Sponsor will develop detailed life and fire safety (L&FS) operational policies and procedures for the hotel including but not limited to emergency preparedness and response procedures, provisions for regular fire drills and fire training for all staff, and a schedule to regularly check and maintain fire fighting and prevention equipment and facility.</p> <p>7.2 The Sponsor will commission a post-construction audit by a qualified fire safety engineer to confirm that the SLUB hotel construction works were completed in compliance with U.S. NFPA and local code requirements.</p>	<p>7.1a L&FS policy and procedural outline developed and satisfactory to IFC; 7.1b Operational L&FS policies and procedures developed and satisfactory to IFC.</p> <p>7.2 Post-construction audit results indicate compliance with U.S. NFPA and local code requirements.</p>	<p>7.1a First Disbursement + 60 days 7.1b Six months before hotel opening.</p> <p>7.2 Within three months of hotel construction completion.</p>
<p><u>8. Legionella monitoring</u> During operation, the SLUB hotel will conduct regular <i>legionella</i> monitoring in hot water distribution and storage systems.</p>	<p>Monitoring results do not indicate <i>legionella</i> presence in hot water systems.</p>	<p>Annually and to be included in the Annual Monitoring Report to IFC.</p>
<p><u>9. Groundwater monitoring</u> The Sponsor will ensure that on-site groundwater levels are monitored for an additional six months after the completion of dewatering works or when its water level has stabilized, whichever is later.</p>	<p>Results included in Annual Monitoring Report submitted to IFC.</p>	<p>Before hotel opening.</p>
Stakeholder Engagement		
<p><u>10. Stakeholder Engagement and Disclosure</u> The Sponsor, as part of its ESMS (refer to PS1), will develop a systematic approach to stakeholder engagement for its operations in Ulaanbaatar. To this end, it will develop and provide to IFC its hotel-level policy and procedures on stakeholder engagement including an annual stakeholder engagement plan which will detail SLUB's actions in this regard. These documents will also describe means by which SLUB will appropriately disclose project-related E&S information on a regular basis (e.g. participation in the greening of the National Children's Park; waste discharge information; life and fire safety audit results; energy and water efficiency initiatives and results).</p>	<p>Following acceptable to IFC:</p> <p>10.1 Outline of SLUB hotel stakeholder engagement action plan including components such as the following:</p> <ul style="list-style-type: none"> • Annually posting a local language summary of the following E&S information at the main entrance of the SLUB hotel site and at the MCS Office Tower: i) efforts by SLUB and MCS to contribute to greening of the National Children's Park and other parks in UB; ii) waste discharge data; iii) L&FS post-construction audit results; iv) energy and water efficiency audit initiatives and results. • Annually placing a local language advertisement in a major local newspaper indicating that updated E&S information is available from SLUB and MCS should members of the public wish to access it. • Conducting random and discreet interviews with members of the public near the hotel site (e.g. shop owners and shoppers) to understand their views, if any, towards the SL hotel and hotel site development. <p>10.2 SLUB stakeholder engagement policy and procedures.</p>	<p>10.1 Outline - COD-1st</p> <p>The three actions listed under 10.1 (completion indicators) are to be implemented annually until the first anniversary of hotel operation.</p> <p>10.2 Six months before hotel opening.</p>