

Thien Minh Group (IFC Project # 29049)
Environmental and Social Action Plan (ESAP)

Action	Completion Indicators	Due Date
Social and Environmental Assessment and Management Systems		
<u>1. Establish E&S management system and achieve ISO9001 certification</u> Thien Minh will commit to setting up a corporate level E&S management system to monitor E&S performance. The system will be appropriate to the size of its hotel operations and will be managed by dedicated personnel. It will be integrated into the ISO9001 (quality management) certified system, which Thien Minh at the Group level is planning to apply for and for which Thien Minh will commit to achieving certification within 12 months after commitment of this Project. Thien Minh is also committed to achieving HACCP (Hazard Analysis and Critical Control Point system) food safety management certification for its hotels and will work with the Foreign Group to achieve the same.	(i) E&S management system policies and procedures acceptable to IFC (ii) Thien Minh Group E&S position created – terms of reference acceptable to IFC (iii) Thien Minh Group E&S position filled (iv) ISO9001 certification attained (v) HACCP certification attained	(i) Condition Of Disbursement (COD) – 1st + 90 days (ii) COD – 1st (iii) COD – 1st + 90 days (iv) For hotels to be constructed or to undergo major renovations timeline is 12 months from the day that construction or renovation work is completed; for existing hotels not undergoing construction or major renovations timeline is IFC Project Commitment + 12 months (v) For hotels to be constructed or to undergo major renovations timeline is 18 months from the day that construction or renovation work is completed ; for existing hotels not undergoing construction or major renovations timeline is IFC Project Commitment + 18 months
Pollution Prevention and Abatement		
<u>2. Regular monitoring of waste water discharge levels</u> Thien Minh at the Group level, and MC Lodge and Hue Festival at the hotel operation level, currently do not monitor waste water discharge parameters (pH, BOD, COD, total nitrogen, total phosphorus, oil and grease, total suspended solids, and total coliform bacteria) and will be required to do so as part of its E&S management system.	Annual Monitoring Report data confirms compliance with IFC Environmental Health and Safety Guideline levels	Ongoing
<u>3. Water and energy efficiency</u> Thien Minh will commission a water and energy efficiency audit at the MC Lodge and Hue Festival Hotel and implement actions recommended by audit findings towards achieving water conservation goals. It will work with the Foreign Group to commission water and energy efficiency audits at hotels of the Foreign Group and implement actions recommended by audit findings towards achieving resource conservation goals.	Copies of following to IFC: (i) Consultant Terms of Reference (ii) CV's of consultant candidates (iii) Signed consultant contract (iv) Water and energy efficiency audit reports (v) Implementation status report on water and energy saving initiatives	(i) COD 1st (ii) COD 1st + 45 days (iii) COD 1st + 75 days (iv) COD 2nd (v) COD 2nd + 90 days
Community Health, Safety and Security		
<u>4. Life and fire safety (L&FS)</u> 4.1 Thien Minh will commission a qualified fire safety engineer to undertake fire safety audits at the five Vietnamese properties being acquired from Foreign Group and also of the Hue Festival hotel. These audits will identify gaps if any with local fire safety codes, and with an international fire safety standard, this dual code compliance being an IFC guideline requirement. Thien Minh will implement any additional fire protection measures that the audits show to be necessary for code compliance.	Following documentation developed and satisfactory to IFC: 4.1a Audit reports produced; 4.1b Corrective actions (if any) identified by audits implemented. 4.2a Master plan developed;	4.1a COD 1st + 60 days 4.1b COD 1st + 120 days 4.2a Prior to start of construction 4.2b Within 3 months of construction completion

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4.2 A qualified fire safety engineer will be commissioned by Thien Minh to undertake a fire safety audit at MC Lodge in the manner described above, who will also prepare a life and fire safety “Master Plan” effectively a fire safety specification, which when adopted will cause fire safety aspects of building design and operation to be compliant with all local requirements and an international fire safety standard. 4.3 For all future properties to be constructed by Thien Minh, including the planned Thien Minh-owned hotel in Luang Prabang, Lao PDR, Thien Minh will commission a qualified fire safety engineer to develop a life and fire safety master plan at the construction planning phase. 4.4 Whenever Thien Minh engages in new construction or substantial renovation of a hotel property, it will commission a post-construction fire safety audit of the property in order to confirm that the works were completed in compliance with the master plan. 4.5 Thien Minh will also develop as part of its E&S management system detailed policies and procedures on its L&FS management, and on emergency preparedness and response.	4.2b Post-construction audit confirms compliance with local and international standards. 4.3 Master plan developed; 4.4 Post-construction audits indicate compliance with master plan. 4.5 Detailed L&FS policies and procedures in place at Thien Minh	4.3 Prior to start of construction 4.4 Within 3 months of construction completion 4.5 COD 1st + 45 days and COD 2nd
<u>5. Hygienic conditions and Legionella monitoring</u> Thien Minh will commit to ensuring improved hygienic conditions in the kitchen area of Hue Festival Hotel. Thien Minh will commit to establishing Legionella monitoring (through the use of test kits) for its hotels and work with the Foreign Group to establish the same.	(i) IFC supervision visit confirms satisfactory conditions (ii) First Legionella monitoring results provided to IFC	(i) First IFC supervision visit (ii) COD 1st + 45 days

Cultural Heritage

<u>6. Survey and preservation of cultural heritage</u> Prior to and during construction of the Zone ZPP-UA hotel in Luang Prabang, Lao PDR, Thien Minh is committed to commissioning surveys of all structural aspects of the site and existing buildings, retain formal records of survey results, and use the results as a basis for reproducing original architecture where required by the Government Heritage Department. Thien Minh will also document measures taken to preserve, protect and restore cultural aspects of the site during construction and operation.	(i) Survey results submitted to IFC (ii) Evidence of steps taken to reproduce original site architecture where required by Government Heritage Department and UNESCO (iii) Documented cultural preservation and protection measures submitted to IFC	(i) Before construction starts (ii) COD – 1st (iii) Condition of Commitment
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