

Russian Hotel Investments BV Project Environmental and Social Action Plan (ESAP), draft 20100113

	Environmental or Social Issue	Corrective Actions Required	Timetable Milestones/Events
	Approval Process		
1	With the new hotels being located in city centers historical and cultural assets might be affected by the hotel construction. Currently only the site in Yaroslavl, which is within an UNESCO Cultural Heritage area, is covered by this.	When hotels are close to or within historic areas, the preservation of the historic and cultural assets has to be secured by cooperation with the appropriate expertise. For Yaroslavl this includes adjustment of the building to an exterior design acceptable according to the local authorities and UNESCO.	For future hotel developments in historic areas appropriate approvals shall be obtained. For the Yaroslavl site a written non-objection letter for the hotel design by the UNESCO representative is needed ahead of construction start.
	Management Systems		
2	Environmental and Social Management Systems	ISO 14001 certification is to be achieved at the corporate level covering the Russian Federation hotels to be constructed under this agreement within three years of operational start.	Certification to be presented within three years of operation start.
3	Appropriate Life and Fire Safe (L&FS) standards needs to be applied to all future assets	An L&FS expert, acceptable to IFC is to be appointed to oversee the preparation of a L&FS Master plan for each hotel.	L&FS expert to be appointed before first disbursement
4	L&FS Master Plans are needed for each hotel to ensure compliance with both Russian L&FS regulations and international standards (as represented by the Accor standards).	L&FS Master Plans are to be developed and implemented in the design and construction for each hotel as part of the detailed design preparation.	Before commissioning for all hotels currently under construction and before construction start for all further hotels.
5	Compliance with requirements of the L&FS Master Plans to be confirmed before opening of the individual hotels.	L&FS Master Plan implementation to be verified by expert acceptable to IFC post construction but ahead of hotel opening.	Verifying documentation provided ahead of project opening to the public.
6	Cultural asset protection management system	Construction activities always carry the risk of revealing previously unknown cultural assets. The excavation part of the construction work should therefore be covered by a Chance Find Protocol, which shall stipulate how the construction crew shall reach, and who to contact, should unexpected finds appear during the excavation process.	Prepare and implement a Change Find Protocol ahead of any new excavation work (expected to be ahead of the Yaroslavl construction start).

	Labor & working conditions and project affected stakeholders		
7	Management of labor and OHS (Occupational Health and Safety) conditions for contractors, including construction workers.	Develop and include in contracts a code of conduct which will provide contractors with clear guidelines on labor and OHS conditions.	To be included in the Kasa Sroy construction contracts.
8	A grievance mechanism for the construction workers, future hotel employees, and project affected (neighboring) communities shall ensure these groups have an well defined way of expressing grievances and have them handled fair and consistently.	The Company and the Contractor will establish, or verify the existing of a transparent grievance mechanism for the construction workers and project affected (neighboring) communities. The similar system for the hotel employees will be covered by the international commitments made by Accor for all its hotel employees.	The Company to confirm the availability of a grievance mechanism for the construction workers and project affected (neighboring) communities within two months of loan signing and ahead of new construction activities. Actual grievances and the way the grievances were handled are to be included In the Annual Monitoring Reports.