

**KHI Ghana: Environmental and Social Action Plan (ESAP): November 2010**

<b>PS</b>	<b>Action</b>	<b>Completion Indicator</b>	<b>Timetable</b>
1	Comply with the conditions of approval as defined in the Environmental Permit.	Status update provided in Annual Monitoring Report.	Positive covenant.
2	Submit the Mövenpick Human Resources Manual for the hotel confirming compliance with Performance Standard 2: Labor and Working Conditions.	Submission of Human Resources Manual.	Condition of disbursement.
2	Include the requirement for compliance with national labor legislation in all agreements with tenants renting either office or retail space.	Submission of generic rental agreement confirming inclusion of the applicable clause.	Condition of disbursement.
3	Implement a regular stock reconciliation program for diesel stored in the underground storage tanks.	Submission of procedure for stock reconciliation.  Monitoring data submitted via Annual Monitoring Report.	Condition of disbursement.
3	Undertake pressure testing of the diesel storage tanks on an annual basis.	Submission of test results via the Annual Monitoring Report.	Positive covenant.
3	Develop and implement a potable water quality monitoring program compliant with IFC's General EHS Guidelines.	Submission of potable water quality monitoring program.  Monitoring data submitted via Annual Monitoring Report.	Condition of disbursement.
3	Install a metering system on the Building Management System to monitor energy usage in the hotel, office and retail areas separately, along with other energy intensive equipment such as the chillers.	Submission of evidence e.g., photographs, to IFC confirming installation of the meters.  Monitoring data submitted via Annual Monitoring Report.	Condition of disbursement.
3	Appoint an independent consultant in agreement with IFC to undertake an energy and water efficiency audit.	Agreement on consultant.  Submission of audit report.	September 2011.  December 2011.  Positive covenant.
3	Develop and implement a pesticide management plan compliant with IFC's General EHS Guidelines.	Submission of pesticide management plan.	July 2011.  Positive covenant.

4	Develop and implement a monitoring program for; i) <i>legionella</i> bacteria in the hot water system and; ii) the pool / spa water which is independent of existing automatic testing systems.	Submission of water quality monitoring program.  Monitoring data submitted via Annual Monitoring Report.	Condition of disbursement.
4	Develop and implement an accredited HACCP food safety system.  Accreditation of food safety system.	Submission of agreed implementation schedule to IFC.  Submission of documentation confirming certification.	Condition of disbursement.  Six months from public opening.  Positive covenant.
4	Commission an independent life, fire and safety specialist acceptable to IFC to; i) undertake an audit to confirm the hotel has been designed and constructed in accordance with the NFPA standards and detail corrective actions where applicable; and; ii) confirm the hotel's emergency response plan is responsive to the hotel's life, fire and safety design and construction and provide recommendations for the plan's amendment where necessary.	Confirmation of specialist to undertake the audit.  Submission of audit report.	Prior to public opening.  Prior to public opening.  Positive covenant.