

PROTEA TAKORADI (#30580) - ENVIRONMENTAL AND SOCIAL ACTION PLAN

<i>Task</i>	<i>Indicator of Completion</i>	<i>Required Completion Date</i>
PS 1 Social and Environmental Assessment and Management Systems		
1. <u>Plan an Environmental and Social Management System (ESMS).</u> Appoint a suitably qualified individual (or provide training to an individual if a qualified candidate does not exist and then appoint him/her) to lead the development, implementation and maintenance of an ESMS. The ESMS should be based upon project environmental, labor, occupational health and safety (OH&S), protection of the health and safety of guests including life and fire safety and food safety and community-related risks and impacts. Risks and impacts related to construction and operation will be found in applicable regulations, permit conditions, IFC Performance Standards and WBG's EHS Guidelines and contractual requirements and method statements, etc. The ESMS will include relevant policies and procedures that govern the construction and operation of the hotel buildings and will allow for management of all contractors, sub-contractors, etc., using applicable contractual arrangements, integrated into the ESMS. The ESMS shall include provision of resources, organization, training, monitoring and reporting so the company can adequately implement the ESMS, thereby avoiding, minimizing or mitigating risks and impacts, and ultimately informing senior management responsible for decision making of progress in doing so. Summary reports of annual activity should be integrated into the IFC Annual Monitoring Report (AMR).	a) Provide copy of the formal communication appointing person that will lead the implementation of the ESMS.	a) Condition of commitment
2. <u>Develop the Environmental and Social Management System (ESMS).</u> As per the outline above and to meet address the priority E&S risks and impacts of the project.	a) Provide IFC with a summary of the framework for the ESMS that includes: organizational chart, a description of roles, responsibilities and authorities, procedures to avoid, manage or mitigate priority environmental and social issues encountered in building and then operating the hotel.	a) For construction activities – prior to major construction activities b) For operations – prior to commencement of hotel operations
3. <u>Implement the Environmental and Social Management System (ESMS).</u> The ESMS should be considered a 'living system' which will evolve as needs are identified, such as employee training regarding environmental and social issues, engagement with the community as determined by the community grievance mechanism, etc.	a) Prepare and provide IFC with timely Annual Monitoring Reports (AMR) that summarize implementation activities, reports on E&S performance to date and, where necessary, includes required/proposed changes to the ESMS to be taken in order to continually meet Protea Takoradi's commitment to compliance with relevant Ghanaian law, IFC's PS and WBG's EH&S Guidelines for the upcoming year.	a) In the AMR - ongoing
4. <u>Plan and develop a Community Grievance Mechanism (GM).</u> Develop a formalized community grievance mechanism to record, review and respond to community grievances.	a) Provide IFC with a summary of the proposed Community GM.	a) Within 3 months of commitment

<i>Task</i>	<i>Indicator of Completion</i>	<i>Required Completion Date</i>
5. <u>Implement Community Grievance Mechanism (CGM).</u> Publicize the existence of the CGM through appropriate channels.	a) Publicize the Community GM (for example, on the Company's website and at the construction site for the general public to see) – send IFC the relevant web link and photographic evidence of public posting. b) Provide a summary of community grievances received in the past year in the AMR.	a) Within 6 months of commitment b) AMR - ongoing
PS 2 Labor and Working Conditions		
6. <u>Review the Protea HR Manual.</u> Ensure that labor and working conditions, as included in Protea's HR manual and supplemented by additions to meet local and national labor law as applicable, meet IFC's PS 2 and Ghana labor law.	a) Submit review of complete HR policy to IFC (i.e. Protea HR manual plus local amendments) demonstrating compliance with Ghana law and IFC's requirements under PS 2.	a) Prior to commencement of hiring of hotel workers
7. <u>Create and Implement an Employee Grievance Mechanism</u> If one does not already exist within the HR manual, Protea Takoradi will design a grievance mechanism for workers to raise workplace concerns. This mechanism will address grievances using an understandable and transparent process that provides timely feedback to those concerned, without any retribution. The mechanism should also allow for anonymous complaints to be raised and addressed. Upon creation, the grievance mechanism will be implemented and its existence publicized and explained.	a) Provide IFC evidence of an employee grievance mechanism b) Summary of grievances managed through the mechanism	a) Condition of first disbursement b) AMR - ongoing
PS 3 Pollution Prevention and Abatement		
8. <u>Underground Storage Tanks (USTs)</u>	1) Provide evidence that only double skinned Underground Storage Tanks (USTs) will be used 2) USTs will be fitted with a) suitable leak detection, and b) will be subject to a weekly stock reconciliation management programs. 3) Provide IFC evidence that UST(s) comply with local and/or national requirements and will be subject to pressure testing prior to use (submit evidence of test results) and, 4) Will be subject to annual pressure testing to assist in leak prevention (summary of test results to be included in the AMR)	1) Upon signing of the purchase order for the USTs. 2) a) Submit evidence of working leak detection; and b) submit outline of stock reconciliation program 3) Test results upon receipt 4) AMR, ongoing
9. <u>Raw water treatment</u> Ensure that whichever treatment system is selected to treat raw water, the water will meet WHO drinking water standards	Results of drinking water analysis to be included in the AMR	AMR, ongoing
10. <u>Effluent management</u> Ensure that the treated sanitary effluent discharged from the biogas treatment system meets the more stringent of Ghana or IFC's sanitary effluent limits as contained in the WBG.IFC's EH&S Guidelines	Results of effluent analysis to be included in the AMR	3 months from hotel opening
11. <u>Swimming pool water quality management.</u> Ensure that the treatment system to be used to maintain swimming pool water quality meets the more stringent of Ghana or IFC's OH&S requirements with respect to harmful chemicals; also that any discharge of pool water is in compliance with relevant permit limits and/or effluent guidelines.	Summary of compliance activities with respect to pool operations in the AMR	AMR, ongoing
12. <u>Pesticides.</u> Protea Takoradi will ensure pesticides	a) Provide evidence of compliance that all pesticides proposed to be used during	a) At the time of commencement of hotel operations

Task	Indicator of Completion	Required Completion Date
and or fumigants used in all operations comply with the more stringent of national law and IFC's requirements; client will ensure no WHO Class 1a and 1b pesticides are used and only allow use of class II pesticides under specific conditions (i.e. that Class II pesticides are not in use if Ghana lacks restrictions on their distribution and use, <u>or</u> if they are likely to be accessible to personnel without proper training, equipment, and facilities to handle, store, apply, and dispose of these products properly.)	operations including those that may be applied by contractors are acceptable under national law and that no WHO Class 1a or 1b pesticides are in use.	
PS 4 Community Health, Safety and Security		
13. Life and Fire Safety in existing buildings Protea Takoradi will engage a suitably qualified third party, approved by IFC, to audit the Life and Fire Safety (L&FS) systems of new buildings against both Ghanaian and an internationally-recognized L&FS standards (as referenced in the General EH&S Guidelines). The audit report will include a corrective action plan to address deficiencies and recommendations specified in the audit, if any. Correct deficiencies and implement recommendations as identified in the audit report.	a) Provide a copy of the audit report to IFC, and agree with IFC a time-based action plan (if required) to correct deficiencies and implement recommendations b) Correct deficiencies and implement recommendations as identified in the audit report. c) Provide certification to IFC of correction of deficiencies and compliance of existing buildings with required L&FS standards.	a) Condition of first disbursement b) According to schedule agreed with IFC c) Upon completion of corrective actions
14. Legionella Management Protea Takoradi will design and implement a program to control legionella in at-risk infrastructure such as cooling apparatus, hot-water systems, central air-conditioning and swimming pool equipment.	a) Provide IFC with a summary of the proposed program.	a) Prior to commencement of hotel operations.
15. HACCP Program. Protea Takoradi will design and implement a HACCP-based food safety program	a) Provide IFC with a summary of the proposed program.	a) Prior to commencement of hotel operations.