

Annex 1: Environmental and Social Action Plan (ESAP)

No.	Reference	Measure	Final product/deliverable	Expected date of conclusion
PS 1: Evaluation and Management of Environmental and Social Risks and Impacts				
1.1	Environmental and Social Management System (ESMS)	<ol style="list-style-type: none"> 1. Evaluate the Environmental and Social Management System ("ESMS") based on the IFC Implementation Manual and Toolkit 2. Strengthen/update the final, explicit, detailed and specific ESMS for West Resort, which includes: (i) policies; (ii) procedures to identify, evaluate and manage the potential environmental, social, occupational health and safety (OHS) and labor risks and impacts associated with each Project activity, as well as for its contractors and subcontractors; (iii) internal procedures for compliance with the environmental and social management plan (ESMP); (iv) organizational capacity and competence, with definition of roles and assignment of responsibilities for the implementation of this ESMS; (v) protocols for emergency preparedness and response; (vi) methods or plans for the participation of key stakeholders; (vii) mechanisms for external communication and receipt of complaints; (ix) protocols for the dissemination of information to communities, decision-making and training; (x) protocols for the evaluation and continuous improvement of the ESMS; and (xi) periodic audits and inspections with respect to applicable environmental, social and OHS requirements under Panama's environmental and social laws. 	<ol style="list-style-type: none"> 1. ESMS Assessment Report 2. Copy of the updated ESMS for West Resort 	<ol style="list-style-type: none"> 1. Four months after the first disbursement. 2. Six months after the first disbursement.
1.2	Environmental, Social and Occupational Health and Safety Policy	<ol style="list-style-type: none"> 1. Complement the environmental and social policy, with monitoring and communications programs to all members and levels of the organization. 	<ol style="list-style-type: none"> 1. Evidence of the implementation of monitoring and communications programs to all members and levels of the organization 	<ol style="list-style-type: none"> 1. Six months after the first disbursement.

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		2. Create a mechanism to measure permanent improvements in the implementation of environmental and social policies.	2. Permanent improvement mechanism	2. Six months after the first disbursement.
1.3	Emergency Preparedness and Response	1. Strengthen and update the Project Emergency and Evacuation Plan with: (i) procedures for interacting with local and regional emergency and health authorities; (ii) protocols for firefighters, ambulances and other external emergency vehicle services; (iii) evacuation routes and meeting points for the entire Project and for each of the facilities/buildings comprising such development; (iv) training exercises such as annual drills, or more frequently if necessary, or actual events in which West Resort should include other key stakeholders to familiarize them with the appropriate procedures in the event of an emergency.	1. Copy of the strengthened and updated Emergency and Evacuation Plan for the Project	1. 45 days after signing the loan agreement.
1.4	Monitoring and evaluation indicators	1. Develop a compliance matrix with a set of key performance indicators that should be monitored and met in order to measure the effectiveness of the ESMP, as well as being a reference for all legal and contractual obligations of each new and existing Project site, during the construction and O&M phases.	1. Compliance matrix with a list of key management performance and success indicators	1. 45 days after signing the loan agreement.
1.5	Project compliance with applicable regulations	1. Through an independent environmental and social consultant, periodically prepare a consolidated report on environmental, social, health and safety issues as well as on the status of compliance with the CII' s Environmental Sustainability Policy, Panama's environmental, social, and OHS legislation, the IDB's Environmental and Social Policies, and the IFC's Performance Standards, including the progress of the ESMS actions against established key performance indicators.	1. Periodic environmental and social compliance report	1. Annually over the life of the loan
1.6	External Grievance Mechanism for the construction phase	1. Develop and implement an external Grievance Mechanism focused on key stakeholders, including local authorities and communities within the indirect area of influence of the Project, those affected by or of some interest for the construction phase of the Project. This	1. Copies of West Resort's external Grievance Mechanism for the construction phase of the Project	1. 30 days before the start of construction of the Project.

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		external Grievance Mechanism will include details on (i) how information is received from key stakeholders and/or the general public; (ii) how these complaints are evaluated; (iii) how responses are provided and followed up, concluding with the closure of the complaint; and (iv) any adjustments or improvements to the ESMS, in terms of communication and information dissemination.	2. Copies of proof of its implementation.	2. Progress report in each environmental and social compliance report.
1.7	External Grievance Mechanism for operation and maintenance (“O&M”)	1. Provide and implement an external Grievance Mechanism during O&M that incorporates the experiences and lessons learned during the construction phase.	1. Copies of West Resort's external Grievance Mechanism for the construction phase of the Project	1. 30 days before the start of the Project's operation.
			2. Copies of proof of its implementation.	2. Progress report in each environmental and social compliance report.
PS 2: Work and Labor Conditions				
2.1	Human Resources Policies and Procedures	1. For West Resort, develop the Project's human resources policies and procedures that include, among other things, the promotion of gender equality and non-discrimination, equal opportunities, fair treatment, an agreement with appropriate terms and conditions of employment, notice of dismissal and compensation for employees.	1. Copy of West Resort's human resources policies and procedures	1. 45 days after signing the loan agreement.
		2. Develop a control and monitoring mechanism to ensure that contractors and their subcontractors comply with such human resources policies and procedures.	2. Copy of the control and follow-up mechanism for compliance with the human resources policy and its procedures	2. 45 days after signing the loan agreement.

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2.2	Workforce Protection	1. Provide (i) an employment procedure for in-house workers and those hired by third parties, in which the conditions for hiring and firing are in accordance with local and International Labor Organization ("ILO") regulations, including, as a minimum, standards to prevent child and forced labor; (ii) procedures for hiring and dismissing/reducing in-house jobs and the procedures adopted by contractors for their workers; and (iii) procedures for managing and monitoring the performance of in-house and third-party workers	1. Copy of these procedures for West Resort	1. 45 days after signing the loan agreement.
2.3	Accidents and fatalities	1. Report major accidents, including fatalities.	1. Notification of major accidents.	1. Within 24 hours of the occurrence of the accident.
		2. Prepare a root cause analysis and procedure to ensure the implementation of corrective actions.	2. Copy of the causes and closure analysis, with corrective actions	2. Progress report in each environmental and social compliance report.
2.4	Internal Grievance Mechanism for the construction phase	1. Develop and implement an internal Grievance Mechanism focused on direct employees and employees of contractors and subcontractors, during the construction stage of the Project. This internal Grievance Mechanism will include details on how complaints or grievances are recorded, investigated and evaluated, and their follow-up and closure or resolution process.	1. Copies of West Resort's internal Grievance Mechanism for the construction phase of the Project	1. 30 days before the start of construction of the Project.
			2. Copies of proof of its implementation.	2. Progress report in each environmental and social compliance report.
2.5	Internal Grievance Mechanism for operation and	1. Provide and implement an internal Grievance Mechanism during O&M that incorporates the experiences and lessons of the construction stage.	1. Copies of West Resort's internal Grievance Mechanism	1. 30 days before the start of the Project's operation.

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	maintenance ("O&M")		for the O&M of the Project	
			2. Copies of proof of its implementation.	2. Progress report in each environmental and social compliance report.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Water consumption efficiency	1. Develop and implement a water efficiency strategy for the Project, including: (i) a hydrological balance (i.e., an analysis of the demand frequency and of water inputs/outputs); (ii) flows of the different types of use; (iii) measures of efficient use for each use; (iv) monitoring of water quality, according to use; and (iv) a comparative analysis with consumption standards of the tourism and hotel sector, defined in the World Bank's Guidelines on Environment, Health and Safety for Tourism and Hotel Development ("WBG")/IFC.	1. Copy of the water efficient efficiency strategy	1. Six months after signing the loan agreement.
			2. Copies of proof of its implementation.	2. Progress report in each environmental and social compliance report.
3.2	Monitoring and evaluation of wastewater discharges	1. Strengthen the Program for Monitoring Wastewater Discharges from the WWTPs in compliance with local regulations and IFC guidelines on environment, health and safety for water and sanitation (whichever is more rigorous).	1. Copy of the WWTPs Wastewater Discharge Monitoring Program	1. 30 days before the start of the Project's operation.
			2. Copies of proof of its implementation.	2. Progress report in each environmental and social compliance report.
3.3	Waste management	1. Develop an Integrated Solid Waste Management Plan, including a protocol and a strategy for the management and disposal of common waste, as required by the applicable legal framework, as well as evidence of its implementation. This strategy should include details of the	1. Copy of the Integrated Solid Waste Management Plan for the construction phase of the Project.	1. 30 days before the start of construction of the Project.

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		waste management firm accredited by MiAmbiente during the construction phase and the O&M.	2. Copies of proof of its implementation.	2. Progress report in each environmental and social compliance report.
			3. Copy of the Integrated Solid Waste Management Plan for the O&M of the Project.	3. 30 days before the start of construction of the Project.
			4. Copies of proof of its implementation.	4. Progress report in each environmental and social compliance report.
3.7	Use and management of pesticides	1. Produce and implement an integrated pest control (IPC) and/or integrated vector control (IVC) approach for pest management activities. This IPC and IVC approach will involve the coordinated use of environmental and pest information along with available pest control methods, including cultural practices, and biological, genetic and, as a last resort, chemical means to avoid unacceptable levels of pest damage.	1. Copy of Integrated Pest Control (IPC) and/or Integrated Vector Control (IVC) approach	1. 30 days before the start of construction of the Project.
PS 4: Community Health and Safety				
4.1	Worker accommodation standards	1. Develop and implement a procedure that complies with the IFC Guidelines for Worker Accommodation Standards, both for own workers and for those of contractors and subcontractors, focusing on the characteristics and conditions of temporary construction camps, whether new facilities built on site or existing facilities provided in neighboring communities.	1. Copy of the procedure that complies with IFC guidelines on worker accommodation standards.	1. 30 days before the start of construction of the Project.

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4.2	Fire protection system and protection of life	1. Provide certification from a qualified professional acceptable to IDB Invest that the design and construction of fire safety and life protection (F&LP) systems for the Project's buildings and facilities comply with the F&LP requirements of the IFC General Guidelines on Environment, Health and Safety, that the design is fully compliant with the international F&LP code and the host country's (Panama) F&LP code.	1. Copy of the certificate of compliance with the design and construction of the fire protection and life protection system.	1. 30 days prior to the construction of the fire and life protection system
		2. After construction, a qualified F&LP professional acceptable to IDB Invest will inspect the project and present a certificate that the buildings and facilities contemplated in the Project are constructed in accordance with the previously approved engineering design and that all F&LP systems were installed as designed and tested in accordance with international requirements.	2. Copy of the certificate of compliance with post-construction of the fire protection and life protection system.	2. 30 days before the start of the Project's operation
4.3	External Security Policy and Protocols	1. Provide a copy of the contract between West Resort and the Project's security company or companies to verify, among other aspects, that conditions have been included allowing for: (i) conducting reasonable investigations to ensure that security personnel do not have a criminal record and have not been involved in cases of abuse in the past; (ii) verifying details of necessary training in relation to the use of force; (iii) verifying restrictions on the use of firearms; and (iv) identifying details of environmental awareness training.	1. Copy of the contracts between West Resort and the security company(ies)	1. 45 days after signing the loan agreement.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Protection of Marine Wildlife	1. Develop a Biodiversity Plan that includes a conservation proposal associated with the sighting of marine species, including a sea turtle nesting inventory on the Project beaches and a macrofauna inventory of seagrasses in front of the Project, which should coordinate these activities with the regional authorities of MiAmbiente and submit a report every 6 months on these sighting/nesting phenomena, in order to contribute to the protection and	1. Copy of the Project Biodiversity Plan	1. Eight months after signing the loan agreement

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		conservation of these marine species within the Project area.		
6.2	Supply Chain	1. Provide a verification practice and a system for primary suppliers, which: (i) will institute an ongoing review of the Project's primary supply chains; (ii) will limit purchases to suppliers who can demonstrate that they contribute to significant conservation of critical and/or natural habitats (this can be demonstrated by delivery of a certified product or progress towards verification or certification under a credible scheme in the case of certain primary goods and/or sites); and (iii) where possible, will require action to move, over time, the primary supply chain of the Project to suppliers who can demonstrate that they have no significant adverse impact on these areas.	1. Copy of the verification practice and the system to evaluate the primary suppliers of the Project.	1. Six months after signing the loan agreement
PS 8: Cultural Heritage				
8.1	Archaeological protection and rescue	2. Develop an Archaeological Prospecting and Rescue Plan for the 10 ha that comprise the Project's area of influence complying with Law No. 14 of May 5, 1982 on Historical Heritage modified by Law No. 58 of August 7, 2003	2. Copy of the Project Archaeological Prospecting and Rescue Plan	2. 30 days before the start of construction of the Project.