

Selina - Environmental and Social Action Plan (ESAP)

No.	Reference	Measure	Final Product/Deliverable	Expected Completion Date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental and Social Management System (ESMS)	1. Develop the final, detailed and specific ESMS based on its operations that includes:(i) an Environmental, Social and Health and Safety (ESHS) policy; (ii) internal procedures to identify, assess, and manage possible ESHS risks and impacts associated with each Project activity, both for their own works and those engaged by third parties (contractors and subcontractors); (iii) internal procedures to ensure compliance with the Environmental Management Plan (EMP); (iv) organizational capacity and competency, including the definition of roles and allocation of responsibilities for the implementation of said ESMS; (v) emergency preparedness and response protocols; (vi) stakeholder engagement methods or planning; (vii) external communication and grievance mechanism; (viii) protocols for the disclosure of information, decision making and training to communities; (ix) protocols for the evaluation and continuous improvement of the ESMS; and (xi) regular audits and inspections of ESHS requirements under the countries environmental regulation, where they operate	1. Copy of the final, detailed and specific ESMS for Selina	1. 180 days after signing the loan agreement.
1.2	Environmental, Social and Occupational Health and Safety Policy	1. Develop an overarching ESHS policy. 2. Define the person within Selina who will ensure compliance with and be responsible for the execution of this comprehensive policy and how this policy will be communicated to all levels of the organization. 3. Create a mechanism to measure and communicate continuous improvements in the implementation of the overarching ESHS policy.	1. Copy of Selina’s ESHS policy. 2. Copy of the contract or of the administrative procedure that appoints the person. 3. Mechanism for measuring and communicating	1. 90 days after signing the loan agreement. 2. Before first disbursement. 3. 90 days after signing the loan agreement.

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			continuous improvements in the implementation of the ESHS Policy.	
1.3	Identification of Risks and Impacts	1. Perform the identification and assessment of direct and indirect, and synergistic ESHS risks and impacts for each new facility and each Project phase, taking into account: (i) cumulative impacts; (ii) GHG emissions, both during construction and O&M; and (iii) relevant risks associated with natural hazards and climate change, and adaptation opportunities.	1. Copy of the identification and assessment of ESHS risks and impacts for each new facility.	1. 15 days prior to the start of construction of each new facility. Applies starting 90 days after signing the loan agreement.
1.4	Environmental and Social Management Plan (ESMP)	<p>1. Develop an ESMP specific to the construction stage of each new facility, with the following measures: (i) an Impact Management Program for the physical, biological, and visual environment, which will include mitigation measures for any impact on terrain relief (in the event of earthmoving or earthworks); hazardous and non-hazardous solid waste management; control of polluting gases emissions by construction machinery and equipment; disturbance of the environment due to the increased generation of dust and noise; control of liquid effluents, such as: industrial, runoff and domestic; (ii) an Impact Management Program for the socioeconomic environment, which will include safety measures for the communities located in the vicinity of the Project; ESHS training for construction managers and workers; communication measures for inter-institutional coordination; and measures to ensure safe and hygienic-sanitary conditions for workers during construction.</p> <p>2. Develop an ESMP for the O&M phase of each existing and new development site of the Project, that includes the</p>	<p>1. Copy of the ESMP specific to the construction stage of each new facility.</p> <p>2. Copy of the O&M ESMP specific to each existing</p>	<p>1. 15 days prior to the start of construction of each new facility. Applies starting 90 days after signing the loan agreement.</p> <p>2. 180 days after signing the loan</p>

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		<p>following measures: (i) an Environmental Monitoring and Vigilance Program, especially for pollutant gas emissions from fixed Project sources (smelters, boilers, power generators, etc.); (ii) a Comprehensive Solid and Liquid Waste Management Program, which emphasizes environmentally friendly measures to store and dispose of any waste that cannot be reduced, reused or recycled, and also provides measures for the special handling of hazardous waste, such as oils, greases, paints, solvents, medicines (should there be a health center or service), disinfectants, or any other product that requires special management used during the Project's O&M activities under local environmental and health regulations; and (iii) a Workplace Health and Safety Program for the comprehensive management of actions to prevent occupational hazards.</p>	<p>and new development site of the Project</p>	<p>agreement for the existing facilities, and 15 days prior to the start of operations for the new facilities.</p>
1.5	Organizational Capacity	1. Define the E&S Organizational Capacity and Competency policy or policies	1. Copy of the policy or policies.	1. Before first disbursement.
		2. Appoint a person responsible for E&S matters, in addition to defining the functions, responsibilities, and powers for the implementation of the ESMS and guaranteeing adequate human and financial resources as part of the ESMS.	2. Copy of the contract or of the administrative procedure that appoints the person.	2. Before first disbursement.
		3. Develop an introductory training program for all personnel responsible of the management of each existing or future facility.	3. Copy of the training program.	3. 120 days after signing the loan agreement.
		4. Conduct a refresher training program for all personnel responsible of the management of each existing or future facility.	4. Evidence of the implementation of the refresher training program.	4. At least once a year after the introductory training program.

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1.6	Emergency Preparedness and Response	<p>1. Develop a Policy that requires for each facility to have its specific Emergency Response Plan (ERP) depending on each site phase, with a set of specific pre-defined procedures for coordination, alert, mobilization and response in the event or imminence of a particular event, such as: (i) natural hazards such as earthquakes, hurricanes and/or tropical storms, floods, thunderstorms, etc.; (ii) human conflicts (e.g., civil and war disruptions); and (iii) technological hazards from fires, explosions, fuel spills, and accidents befalling workers and suppliers.</p>	<p>1. Copy of the Policy that requires for each site to have its specific Emergency Response Plan</p>	<p>1. 90 days after signing the loan agreement..</p>
		<p>2. Develop a specific ERP for all existing facilities that address the following aspects: (i) specific emergency response procedures; (ii) trained emergency response teams; (iii) emergency contacts and communication systems/protocols; (iv) procedures for interaction with local and regional emergency and health authorities; (v) permanent emergency equipment and facilities (e.g., first aid stations, extinguishers/hoses, sprinkler systems); (vi) protocols for fire trucks, ambulances and other emergency vehicle services; (vii) evacuation routes and meeting points; (viii) training exercises such as annual drills, or more frequently if necessary, or actual events in which Selina will include nearby properties and other key stakeholders to familiarize them with proper procedures in the event of an emergency.</p>	<p>2. Copy of the Emergency Response Plan for existing facilities.</p>	<p>2. 180 days after signing the loan agreement for the existing facilities.</p>
		<p>3. Develop a specific ERP for each new facility that address the above-mentioned aspects</p>	<p>3. Copy of the Emergency Response Plan for each new facility</p>	<p>3. 15 days prior to the start of operations for each new facility. Applies starting 90 days after</p>

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				signing the loan agreement.
		4. For existing facilities, develop, for each ERP, an annual Training Program and a Root Cause Analysis procedure for any major accident or fatality, as well as a description of the corrective actions required to minimize the risk of reoccurrence.	4. Copy of the annual Training Programs and Root Cause Analyses for the existing facilities.	4. 180 days after signing the loan agreement for the existing facilities.
		5. For new facilities, develop, for each ERP, an annual Training Program and a Root Cause Analysis procedure for any major accident or fatality, as well as a description of the corrective actions required to minimize the risk of reoccurrence.	5. Copy of the annual Training Programs and Root Cause Analyses for each new facility	5. 15 days prior to the start of operations for each new facility. Applies starting 90 days after signing the loan agreement.
1.7	Crisis Management	1. Develop a specific Crisis Management Policy that sets forth governance standards to ensure an adequate organizational response to events that threaten or affect Selina's assets.	1. Copy of the Crisis Management Policy for Selina	1. 90 days after signing the loan agreement.
1.8	Monitoring and Review Indicators	2. Develop a compliance matrix with a set of KPIs that will: (i) be monitored and met in order to measure the effectiveness of the ESMP and the fulfillment of all Project legal and contractual obligations during the construction and O&M phases; (ii) includes the competent Authority granting the authorization or issuing the permit; (ii) details the dates of issue and effectiveness of each permit or authorization ; (iii) contains the name of the person within Selina who is responsible for follow-up/compliance; and (iv) sets up communication and future compliance procedures.	2. Compliance matrix.	2. 120 days after signing the loan agreement.

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1.9	Project Compliance with Applicable Standards	1. Prepare, through an internal or external audit (this last endorsed by the country Environmental Authority), a consolidated report on the compliance status of all ESHS policies and measures applicable that includes: (i) the progress of ESMS actions with regard to the defined KPIs; (ii) the compliance status with the IDB Invest E&S Sustainability Policy; and (iii) the compliance status of in-country local environmental and health regulations.	1. Environmental and social compliance report.	1. Annually over the life of the loan.
1.10	Stakeholder Engagement	1. Update the Stakeholder Engagement Management Plan, to include: (i) updated identification of all stakeholders(local authorities and surrounding communities and neighbors); (ii) differentiated measures to enable the effective engagement of disadvantaged or vulnerable groups; (iii) a mechanism to ensure that community representatives accurately represent the views of the affected communities; (iv) details on how information is disclosed to stakeholders; (v) details on the stakeholder engagement process in these communities and how they can access the grievance mechanism; (vi) regular reporting on the company's E&S performance to stakeholders and the public at large; and (vii) mechanisms to implement and disclose the updated procedure to all its staff as part of a Training Program.	1. Copy of the updated Stakeholder Engagement Management Plan.	1. 60 days after signing the loan agreement.
		2. As part of the Stakeholder Engagement Management Plan, Develop a Community Relations Procedure that sets out effective strategies for communicating and maintaining good relations with the population in the area of influence of the Project and with stakeholders that defines the protocols for the following activities: (i) interviews with authorities and stakeholder representatives; (ii) stakeholder briefings; and (iii) media and social networks management.	2. Copy of the Community Relation Procedure	2. 60 days after signing the loan agreement.

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		3. Appoint the work team responsible for implementation of the Community Relations Procedure (e.g., the Social Management manager and a team of social promoters).	3. Copy of the contracts of the people hired or of the administrative instruments that appoint the team,	3. 60 days after signing the loan agreement.
1.11	Public Hearing	1. For every new facility, conduct a public participation event aligned with PS-1 that aims at: (i) obtaining the views of both men and women, if necessary through separate engagement or fora, and (ii) reflecting the different concerns and priorities of men and women about the project's impacts, management mechanisms, and benefits, where appropriate; (iii) documenting the process, especially the measures taken to avoid or minimize risks and adverse impacts on affected communities or stakeholder; and (iv) informing those affected of how their concerns have been addressed.	1. Report on the public participation event of each new facility.	1. Within 30 days of the start of construction of each new facility.
1.12	External communication	1. Develop a Global Corporate Communication Policy, which shall ensure that all communication, whether directed to internal or external audiences, is delivered in a careful, responsible, and efficient manner.	1. Copy of the Global Corporate Communication Policy	1. 90 days after signing the loan agreement.
1.13	External grievance mechanism for the construction phase	1. Develop an External Grievance Mechanism for the new facilities, focused on the clients, communities and key stakeholders (local authorities, neighbors) that includes details on how grievances or complaints are recorded, investigated, evaluated, and followed-up and closed.	1. Copies of the external grievance mechanism for the construction phase of each new facilities.	1. 15 days prior to the start of construction of each new facility. Applies starting 90 days after signing the loan agreement.
		2. Implement an External Grievance Mechanism	2. Evidence of the implementation of the mechanism.	2. With each E&S compliance report.

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1.14	External grievance mechanism during operation and maintenance (O&M)	1. For existing and new facilities, develop an external grievance mechanism for their O&M phase that incorporates the experiences and lessons learned during the construction phase.	1. O&M external grievance mechanism.	1. For existing facilities, 180 days after signing the loan agreement. For new facilities, 15 days prior to the start of operations.
		2. Implement an external grievance mechanism for the O&M phase.	2. Copies of proof of its implementation.	2. With each E&S compliance report.
PS 2: Labor and Working Conditions				
2.1	Internal Grievance Mechanism	1. Adapt Selina's internal grievance mechanism to provide an easily accessible and culturally appropriate mechanism that can be accessed at any time (e.g. an external mailbox or booth with printed or digital forms to register the grievance or inquiry) and allow anonymous grievances or inquiries to be received and processed.	1. Copies of the updated internal grievance mechanism for Selina.	1. 90 days after signing the loan agreement.
			2. Copies of proof of its implementation.	2. With each E&S compliance report.
2.2	Occupational Health and Safety	1. Develop a Corporate Occupational Health and Safety (OHS) Policy, to ensure the health and safety of its employees, contractors, and suppliers, and of the communities in which the Company operates, by acting appropriately to prevent and avoid accidents and damage to health.	1. Copy of the Corporate OHS Policy.	1. 90 days after signing the loan agreement.
		2. Develop an Occupational Health and Safety Program (OHSP) for each existing and new facility, that includes: (i) the identification of possible OHS risks for workers according to the work they perform; (ii) a risk assessment, a risk map and an intervention plan; (iii) details of the preventive and protective measures implemented; (iv) worker training; (v) safety briefings for	2. Copy of the Occupational Safety and Health Program.	2. For existing facilities, 180 days after signing the loan agreement. For new facilities 30 days prior to the

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		visitors; (vi) specific training for workers and emergency brigades; (vii) the need of medical examinations; (viii) the way how statistics on accidents and occupational diseases will be collected; and (vi) the forms on how to prepare reports in the event of workplace accidents or incidents.		start of their operation. Applies starting 90 days after signing the loan agreement.
		3. Implement the Occupational Health and Safety Program (OHSP).	3. Copies of proof of its implementation.	3. With each E&S compliance report.
2.3	Notification Mechanism and Fatalities' Root Cause Analysis	1. As part of the OHSP, develop a procedure and mechanism to notify emergency response agencies, local authorities, and IDB Invest of fatalities or major accidents	1. Copy of the procedure and mechanism	1. 90 days after signing the loan agreement.
		2. Adopt an accident Root Cause Analysis procedure to ensure the implementation of corrective actions to prevent future accidents.	2. Copy of Root Cause Analysis procedure.	2. 90 days after signing the loan agreement.
2.4	Monitoring accidents	1. Within ESMS, develop an Accident Monitoring Procedure, to account for: (i) accident rates and incidents resulting in the loss working day; and (ii) the severity of the accidents.	1. Copy of the accident monitoring procedure within ESMS	1. 90 days after signing the loan agreement.
2.5	Supply Chain	1. As an integrated part of the internal Supplier Certification, develop a Corporate Supplier Selection Process that contains a questionnaire to be answered by suppliers to assess their well-being.	1. Copy of the Corporate Supplier Selection Process.	1. 120 days after signing the loan agreement.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Water Consumption	1. Develop a Corporate Water Consumption Awareness and Reduction Program for all facilities in their O&M phase in order to implement the following water saving measures: (i) better technologies to make processes more efficient; (ii) monthly monitoring of water consumption; and (iii) a set of procedures to be triggered upon by any variation in water consumption.	1. Copy of the Corporate Water Consumption Awareness and Reduction Program for Selina	1. 120 days after signing the loan agreement.

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		2. Implement a Corporate Water Consumption Awareness and Reduction Program for all facilities in their O&M phase.	2. Copies of proof of its implementation.	2. With each E&S compliance report.
3.2	Energy Efficiency	1. Develop and implement a Corporate Energy Efficiency Program that will: (i) identify measures to reduce to a the use of fuels and electricity; (ii) identify measures for the optimization of heat; (iii) analyze alternatives to utilize renewable energy sources; and (iv) analyze and implement comprehensive energy saving measures (such as replacing low-efficiency air conditioning systems with high-efficiency equipment and ozone-friendly refrigerants; installing LED lights; automating processes through programmable logistics controls; and applying inverter technology to maximize efficiency in the equipment with the highest demand).	1. Copy of the Corporate Energy Efficiency Program for Selina	1. 120 days after signing the loan agreement.
		2. Implement the Corporate Energy Efficiency Program	2. Copies of proof of its implementation.	2. With each E&S compliance report
3.3	Effluent Pollution Prevention	1. Develop a Corporate Effluent Management Program to regulate the testing, evaluation, and monitoring and control, of the wastewater treatment systems (grease trap, WWTP, sand traps, etc.), before discharging its water into the municipal sewer systems or any other authorized sources; that complies with in-country legislation and IFC's ¹ emissions and effluent guidelines.	1. Copy of the Corporate Effluent Management Program.	1. 120 days after signing the loan agreement.
		2. Implement the Corporate Effluent Management Program	2. Copies of proof of its implementation.	2. With each E&S compliance report.

¹ Guidelines on Environment, Health and Safety for Water and Sanitation, of the IFC; December 2007

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3.4	Solid Waste Pollution Prevention	1. Establish a Corporate Solid Waste Management Program, that: (i) fosters a reduce, reuse and recycle initiative and training campaign for all personnel and hosts; and (ii) classifies and registers solid waste into two components: 1) organic (losses from their kitchen and restaurants, which correspond to damaged products that are thrown away); and 2) recyclables (cardboard, paper, plastics, wood, metals, etc.) which will continue to be removed by a duly authorized external supplier for final disposal.	1. Copy of the Corporate Solid Waste Management Program	1. 120 days after signing the loan agreement.
		2. Implement the Corporate Solid Waste Management Program	2. Copies of proof of its implementation.	2. With each E&S compliance report.
3.5	Hazardous Waste Management	1. Develop a Corporate Working Manual for Hazardous Waste Management that aims at identifying, controlling, minimizing, giving value, and comprehensively managing the hazardous waste generated in each facility or hotel, and that seeks to develop a comprehensive waste management culture.	1. Copy of the Corporate Working Manual for Hazardous Waste Management.	1. 120 days after signing the loan agreement.
		2. Implement the Corporate Working Manual for Hazardous Waste Management	2. Copies of proof of its implementation.	2. With each E&S compliance report.
		3. Develop a Hazardous Materials Safe Storage Standard that: (i) contains compliances sheets for each hazardous substance according to their characteristics; (ii) complies with in-country regulations, standards, and safety procedures; and (iii) produces auditable reports.	3. Copy of the Hazardous Materials Safe Storage Standard for Selina	3. 120 days after signing the loan agreement.
		4. Implement the Hazardous Materials Safe Storage Standard	4. Copies of proof of its implementation.	4. With each E&S compliance report.

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PS 4: Community Health, Safety and Security				
4.1	Fire protection systems	1. For each new facility, provide a certification from a professional acceptable to IDB Invest, that the design of its fire protection system: (i) satisfies the L&FS requirements of the IFC General Environmental, Health, and Safety Guidelines; and (ii) its design is fully compliant with the international L&FS code and the in-country laws.	1. Copy of the certification for each new facility.	1. 15 days prior to the start of construction of each new facility. Applies starting 90 days after signing the loan agreement.
		2. For each new facilities that will begin operation, provide a certification by a professional acceptable to IDB Invest that that the buildings and facilities: (i) were built as per the approved L&FS design; and (ii) all L&FS devices were installed as designed and tested in accordance with international requirements.	2. Copy of the certification for new facilities beginning operations.	2. 30 days prior to the start of operations. Applies starting 90 days after signing the loan agreement.
		3. For all existing facilities, develop an Implementation Program with a schedule to provide a certification by a professional acceptable to IDB Invest that that the buildings and facilities: (i) were built as per the approved L&FS design; and (ii) all L&FS devices were installed as designed and tested in accordance with international requirements.	3. Copy of the Implementation Program	3. 240 days after signing the loan agreement
			4. Copy of the certification for existing facilities, according to the Implementation Program.	4. With each E&S compliance report.
4.2	External Security Policy and Protocols	1. Provide a copy of the contract with the security or companies to be engaged, in order to verify, among other aspects, that it includes clauses that allow it to (i) conduct reasonable investigations to ensure that security personnel do not have a criminal record and have not been involved in cases of abuse; (ii) verify details of necessary training on the use of force; (iii) verify	1. Copy of the contracts.	1. 90 days after signing the loan agreement.

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		restrictions on the use of firearms; and (iv) identify details of environmental awareness training.		
PS 5: Land Acquisition and Involuntary Resettlement				
5.1	Land Acquisition	1. Prepare a Corporate Land Selection and Acquisition Manual with specific procedures that comply with PS-5 requirements.	1. Copy of the Corporate Land Selection and Acquisition Manual.	1. 90 days after signing the loan agreement.
		2. Adopt the Corporate Land Selection and Acquisition Manual.	2. Evidence of the manual's adoption.	2. 120 days after signing the loan agreement.
		3. For all new facilities that require the physical or generates an economical displacement of people, prepare, submit for IDB's approval a Resettlement Action Plan, compliant with PS-5.	3. Resettlement Action Plan.	3. 30 day prior to the beginning of the works.
		4. For all new facilities that require the physical or generates an economical displacement of people, implement the corresponding Resettlement Action Plan.	4. Proof of the execution of the Resettlement Action Plan	4. Periodic reports.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Conservation of biodiversity	1. As part of the Corporate Land Selection and Acquisition Manual, prepare a Biodiversity Conservation procedure, compliant with PS-6 requirements, that contains measures to minimize impacts and restore biodiversity and ecosystem services affected by any new the facility.	1. Copy of the Biodiversity Conservation procedure.	1. 120 days after signing the loan agreement.
PS 7: Indigenous Peoples				
7.1	Indigenous Peoples	1. As part of the Corporate Land Selection and Acquisition Manual, prepare an Indigenous People procedure, compliant with PS-7, to avoid or manage impacts to indigenous peoples.	1. Copy of the Indigenous People procedure.	1. 120 days after signing the loan agreement.
PS 8: Cultural Heritage				
8.1	Cultural Heritage	1. For all new facilities located outside of known protected cultural heritage sites and that involves earthworks, obtain a Certificate of Absence of Archaeological Remains.	1. Copies of the Certificate of Absence of Archaeological Remains	1. 15 days prior to the start of construction of any new facility.

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				Applies starting 90 days after signing the loan agreement.
		2. Prepare a Chance Find Procedure, compliant with PS-8, applicable to all works that involve earthworks.	2. Copy of the Chance Find Procedure	2. 15 days prior to the start of execution of any new facility. Applies starting 90 days after signing the loan agreement.
		3. Prepare an Archaeological Monitoring Plan, compliant with PS-8, applicable to all works that involve earthworks inside of known protected cultural heritage sites.	3. Copy of the Archeological Monitoring Plan	3. 15 days prior to the start of execution of any new facility. Applies starting 90 days after signing the loan agreement.
		4. Implement an Archaeological Monitoring Plan to all works that involve earthworks inside of known protected cultural heritage sites.	4. Monitoring reports	4. Periodic reports.