

ENVIRONMENTAL AND SOCIAL REVIEW SUMMARY (ESRS) UNICARIBE Inclusive Higher Education – DOMINICAN REPUBLIC

Original language of the document: Spanish

Issuance date: September 2020

1 General Information of the Project and Scope of the Environmental and Social Review

Universidad del Caribe ("UNICARIBE", the "University" or the "Institution"), is a private Higher Education Institution (HEI), incorporated as a non-profit entity under the laws of the Dominican Republic, formed and operated by Fundación Educativa del Caribe, Inc. It began operations in 1995 in the city of Santo Domingo, where it continues to operate, with more than 31,000 graduates to date. Enrollment exceeds 25,000 students and it has close to 400 employees (more than 55% of whom are women).

The proposed operation consists of a loan to finance UNICARIBE's Strategic and Investment Plan for 2019-2020 (the "Project"), aimed at (i) expanding the university's spaces and physical capacity, which includes completing the refurbishment of a new 6,400 m² academic and administrative building in Santo Domingo, as well as building a new satellite campus in the City of Knowledge ("Ciudad del Conocimiento") grounds in the city of Monte Plata (the "Monte Planta Campus"); (ii) expanding the University's academic programs in the short term, with new degrees and professional training courses, in line with the current training needs of the Dominican Republic; (iii) acquiring and implementing specialized distance learning software to strengthen its current platforms and capacities; and (iv) renewing and improving its facilities with new equipment and laboratories.

The scope of IDB Invest's environmental and social review included a desktop review of UNICARIBE's environmental and social (E&S), and occupational health and safety (OHS) performance over time; holding virtual meetings with the Institution's representatives; an analysis of E&S and OHS manuals, procedures, licenses and permits of the Project; and a review of its operational reports.

2 Environmental and Social Categorization and Rationale

This has been classified as a **Category B** operation under IDB Invest's Environmental and Social Sustainability Policy, as its environmental and social impacts and risks are expected to be generally reversible and mitigable through currently available measures that use existing technologies.

Possible E&S and OHS impacts and risks related to the construction and refurbishment of the Project's buildings, include: (i) soil movement and compaction; (ii) noise pollution and vibration generation; (iii) generation of both hazardous and non-hazardous waste; (iv) polluting emissions to the atmosphere, mainly combustion gases from construction machinery and equipment; (v) wastewater generation; (vi) risks to the health and safety of workers; and (vii) community health and safety impacts related to increased vehicular traffic and partial road closures.

During operation and maintenance (O&M), the most important E&S and OHS risks and impacts involve: (i) risks to the health and safety of workers; (ii) generation of both hazardous and non-hazardous solid waste; (iii) generation of liquid waste (mainly domestic wastewater); and (iv) use of resources, mainly water and energy (both provided by municipal public services).

Due to its location, the Project is subject to natural (earthquakes and hurricanes) and social (vandalism) hazards. However, their potential risk is deemed moderate to low, in terms of the damage they could cause to both physical infrastructure and users (students, teachers, administrative staff, etc.).

The Project will trigger the following International Finance Corporation (IFC) Performance Standards (PS): PS 1: Assessment and Management of Environmental and Social Risks and Impacts; PS 2: Labor and Working Conditions; PS 3: Natural Resource Efficiency and Pollution Prevention; and PS 4: Community Health, Safety and Security.

3 Environmental and Social Context

At present, UNICARIBE has five four-story buildings and one five-story building at its headquarters located on 30 de Mayo Avenue, Km. 7.5, in the city of Santo Domingo. These buildings are equipped with all the basic public services (water, electricity, sewage, rainwater drainage, etc.) provided by the municipality; they also have private telecommunications and surveillance and security services. The Institution is also building the "UNICARIBE Recinto Monte Plata" project on a 7,000 m² lot near the Ciudad del Conocimiento grounds in the city of Monte Plata. This educational facility will also be equipped with all the basic public and private services available at the Headquarters.

In order to execute the Project, the Institution has procured all the environmental management instruments provided for in the environmental legislation¹ and complied with all due requirements by the competent environmental authorities². It must, however, process and obtain the following permits or authorizations for the construction phase: (i) Construction License by the Ministry of Public Works and Communications; (ii) Blueprint review (electrical, fire protection systems, fire detection and alarm systems, etc.), by the Fire Department; (iii) Minimum Impact Certificate for the Monte Plata Campus site, issued by the Ministry of Environment and Natural Resources; and (iv) Water supply agreement to draw water from the municipal network (new or renewed contract). For its O&M phase, the Project must first obtain: (i) a certificate of compliance with the Occupational Health and Safety Program (Regulation No. 522-06) authorized by the General Directorate of Industrial Hygiene and Safety of the Ministry of Labor; and (ii) a Health Record by the Ministry of Public Health (MPH); among others.

4 Environmental Risks and Impacts and Proposed Mitigation and Compensation Measures

4.1 Assessment and Management of Environmental and Social Risks and Impacts

4.1.a E&S Assessment and Management System

To date, UNICARIBE has not yet prepared a specific Environmental and Social Management System (ESMS) for its operations. The Institution will therefore prepare and adopt an ESMS that will include: (i) an E&S and OHS policy; (ii) internal procedures to identify, assess and manage the possible environmental, social, labor and OHS risks and impacts associated with each of the Project's activities, both for the Institution's own workers and for those hired by third parties (contractors and subcontractors); (iii) internal procedures

¹ Law 64-00 - General Environment and Natural Resources Act.

² The National District Environmental Directorate and the Monte Plata Provincial Directorate, both belonging to the Ministry of Environment and Natural Resources.

to ensure compliance with the Environmental Management and Adaptation Plan (EMAP); (iv) an organization chart including role definitions and duty allocations for the ESMS's implementation; (v) emergency preparedness and response protocols; (vi) stakeholders involvement plans or methods; (vii) a grievance handling and external communications mechanism; (viii) information disclosure, decision making, and community education protocols; (ix) ESMS evaluation and continuous improvement protocols; and (xi) regular audits and inspections of environmental, social, labor, and OHS requirements, pursuant to Dominican Republic regulations.

4.1.b Policy

UNICARIBE still lacks a comprehensive E&S and OHS policy. In this regard, it shall prepare and adopt a policy specifying the following: (i) the person within the organization in charge of compliance with this policy and responsible for its implementation; (ii) the way in which this policy will be transmitted to all levels of the organization; and (iii) the way in which continuous improvements in the policy's implementation will be assessed and notified.

4.1.c Identification of Risks and Impacts

For each new construction or refurbishment project, in addition to ensuring compliance with local environmental impact regulations, UNICARIBE will identify and evaluate the environmental, social, and OHS risks and impacts (direct, indirect, synergistic, and cumulative) of each new facility and Project phase (design, pre-construction or restoration, construction or expansion, operation and maintenance, and closure or decommissioning), further identifying any risks associated with natural hazards and climate change. It will also prepare and maintain an updated E&S and OHS risk matrix for each Project phase throughout the operations, in order to obtain, monitor and control the necessary local permits or licenses.

4.1.d Management Program

UNICARIBE will prepare a specific EMAP for each building to be built or refurbished, taking the appropriate management measures to address every major environmental impact and risk. This EMAP will include the following programs: (i) an impact management program for the physical, biological, and visual environment, which shall include the following, among others: management measures for each impact on the terrain (in case of earthworks or land preparation); management measures for hazardous and non-hazardous solid waste; monitoring activities for polluting gas emissions; control measures for dust and noise generation; and control measures for liquid effluents, both domestic and runoff, and (ii) a program to manage socioeconomic impacts, which will include safety measures for communities located near the facilities; training on environmental, social and OHS issues for construction workers and managers; communication measures for inter-institutional coordination; and measures to guarantee safe and hygienic sanitary conditions for workers during the construction phase.

Similarly, the EMAP for the O&M phase of each of the Project's new and operating buildings or sites will include the following programs: (i) a Comprehensive Solid and Liquid Waste Management Program, emphasizing environmentally sound storage and disposal measures for waste that cannot be reduced, reused or recycled and that includes hazardous waste management measures (oils, grease, paints, solvents, infectious biological substances and disinfectants), and (ii) an Occupational Health and Safety Management Program that ensures a safe and healthy work environment, taking into account the risks that are intrinsic to the sector and the specific types of hazards in the work areas, including physical, chemical and biological hazards as well as specific hazards for women.

4.1.e Organizational Capacity and Competency

UNICARIBE has a Risk Management Unit, under the Vice-Rector's Office of Research and Innovation, whose mission is to coordinate, guide and direct disaster risk reduction across the Institution, with the support of various emergency brigades. Nevertheless, it currently lacks an exclusive environmental and social organizational structure that allows for the monitoring of E&S risks and impacts, as well as the implementation of the EMAP and the country's environmental and social regulations in full. UNICARIBE will therefore: (i) define its policy(ies) in terms of organizational capacity and competence in environmental and social matters; (ii) appoint an environmental and social area within the organizational structure; (iii) define said area's duties, its responsibilities and level of authority to implement the ESMS; and (iv) ensure adequate financial and human resources to implement the ESMS.

Similarly, the Institution will conduct an introductory or refresher session of the E&S and OHS Training Program at least once a year, for all personnel responsible for managing each currently operational or future facility. This session will introduce and analyze each facility's environmental, social and OHS risks and impacts, and the enforceable regulations for compliance.

4.1.f Emergency Preparedness and Response

In compliance with the Risk Management Act (Law No. 147-02) and the safety principles of the Occupational Health and Safety Regulation (Decree No. 522-06), UNICARIBE has prepared an Emergency Response Plan (ERP) specifically for its Headquarters. Nevertheless, in order to comply with all the provisions of PS 1 and the safety principles of the OHS regulations, the Institution will prepare a specific ERP for the Monte Plata Campus that will focus on the following issues: (i) emergency response procedures; (ii) qualified emergency response teams; (iii) emergency contacts, and communication systems and protocols; (iv) interaction procedures with local and regional authorities on health issues and emergency resolution; (v) permanent facilities and equipment for emergency response (e.g., first aid stations, hoses, fire extinguishers, sprinkler systems); (vi) protocols for pumps, ambulances and other emergency services and vehicles; (vii) evacuation routes and meeting points; (viii) training exercises, (simulations and drills) involving UNICARIBE staff, other stakeholders and potentially affected parties.

Each ERP will include an annual training program and a root cause analysis procedure for each serious accident or fatality, as well as a description of the corrective actions needed to minimize the risk of new occurrences. In this regard, annual training programs will seek to strengthen effective response to emergency situations and will include courses in (i) first aid (basic life support, bleeding, shock, wounds and burns, fractures, how to move the injured, etc.); (ii) fire fighting and prevention (firefighter safety, bending hoses, handling fire extinguishers, etc.), and (iii) search and rescue, among others.

Furthermore, UNICARIBE will prepare and implement a Crisis Management Policy that sets governance standards to ensure an adequate response to the occurrence or imminent occurrence of a particular event threatening or affecting its assets, such as (i) natural hazards (earthquakes, hurricanes, tropical storms, floods, etc.); (ii) human conflicts (civil unrest or vandalism); and (iii) technological hazards (fires, explosions, spills of dangerous products, and worker and supplier incidents or accidents).

4.1.g Monitoring and Review

UNICARIBE will prepare a compliance matrix for each site, with a list of the permits, licenses and certifications required to operate. This matrix will be updated with the following: (i) key performance indicators (KPIs) to evaluate the EMAP's effectiveness and compliance with the country's contractual and legal obligations; (ii) the competent authority in charge of granting the authorizations or issuing the permits; (iii) the date of issuance or entry into force of each permit or authorization; (iv) the person responsible for monitoring or enforcing each permit; and (v) procedures for future compliance and communication.

The Institution will also prepare, either internally (internal audit) or through an independent external E&S expert (external audit), an annual consolidated report on the status of compliance with all E&S and OHS policies and measures applicable to the Project, including the progress of the ESMS actions with respect to the established KPIs; as well as the status of compliance with IDB Invest's Environmental and Social Sustainability Policy.

4.1.h Stakeholder Engagement

UNICARIBE will develop a Stakeholder Management Plan, which will include (i) an up-to-date map of all stakeholders, including local authorities, neighbors and nearby communities (within a 500 m radius of each facility); (ii) differentiated measures that allow for the effective participation of the most vulnerable or dispossessed groups; (iii) a mechanism that guarantees the representativeness of the affected communities; (iv) details of how information will be disseminated to stakeholders; (v) details of the stakeholder participation process and how communities will be able to access the grievance mechanism; and (vi) procedures for regular reporting on the Institution's environmental and social performance to stakeholders and the general public.

As part of its Stakeholder Management Plan, the Institution will also develop a Community Relations Engagement Procedure that sets out strategies to communicate and engage harmoniously with the population within each facility's area of influence. This procedure will identify the work team responsible for its implementation and define protocols for the following activities: (i) interviews with the authorities and stakeholders' representatives; (ii) briefings with social actors; and (iii) handling of social media and networks.

4.1.i External Communication and Grievance Mechanisms

The Institution's website currently acts as a single point of contact to receive grievances from clients, the community or stakeholders. To this end, UNICARIBE will prepare and implement a mechanism to handle external complaints and grievances, as well as a procedure to document the following: (i) how the complaint was received; (ii) who made the complaint (client, community, stakeholders); (iii) how the complaint was sorted, processed, reviewed, and resolved; (iv) how the complaint was addressed and followed up; (v) how the complaint was closed; and (vi) how the ESMS was adapted or improved in terms of communication and information disclosure.

4.1.j Ongoing Reporting to Affected Communities

UNICARIBE, through its Stakeholder Management Plan, will submit environmental and social performance reports to the communities and anyone who may request them, in the form of an annual sustainability report or similar document.

4.2 Labor and Working Conditions

4.2.a Working Conditions and Management of Worker Relationships

4.2.a.i Human Resources Policies and Procedures

UNICARIBE has a Human Resources (HR) policy and procedures that outline the rules and conditions related to the selection and hiring of personnel; working hours and breaks; vacations; training and development of collaborators; permits and leaves of absence; remuneration and benefits; rights and obligations of both the employer and the collaborators; behavior and disciplinary measures; among other aspects. This policy features a human talent management system to handle administrative processes and support the Institution by regulating the following: (i) requisitioning, attraction, hiring, recruitment and selection of personnel; (ii) onboarding, performance evaluation, training and development of administrative and teaching staff; and (iii) retention and release of personnel in accordance with the profiles and roles defined by the Institution.

In addition, the HR policy and procedures contain: (i) gender equality and non-discrimination, equal opportunity and fair treatment principles; (ii) child labor prohibitions; (iii) workplace harassment prohibitions and sanctions for sexual harassment; (iv) rules of conduct with stakeholders; and (v) conflict of interest, information management and fraud prevention principles. If an employee or collaborator violates any of these principles, he or she must undergo corrective or disciplinary measures that could lead to the termination of the employment contract.

UNICARIBE has other human resource management guidelines and policies, such as the Manual of Good Practices for Virtual Teachers and Regulations for Teachers, available via the human talent management system.

All aspects related to labor and working conditions are managed by the Directorate of Human Management, which assigns competent employees to the various tasks based on their education, training, work experience and skills, as defined in each job description and profile.

4.2.a.ii Working Conditions and Terms of Employment

UNICARIBE's HR policy and procedures comply with the Dominican Republic's labor and OHS legislation³ and International Labor Organization (ILO) conventions. These two instruments regulate the manner and conditions for selecting and hiring personnel; working days and hours, and breaks; vacations; leaves; flexible work systems to promote collaboration and productivity; wages and benefits; employee and employer rights and obligations; conduct and disciplinary measures; safety of assets; risk prevention; and workers with disabilities, among others. In order to reinforce awareness of these working conditions, all

³ Dominican Republic's Labor Code (Law No. 16-92), the Regulation for the Enforcement of the Labor Code (Regulation No. 258/93) and the Regulation for Occupational Health and Safety (Decree No. 522-06)

administrative and teaching staff working in the Institution must undergo a training and onboarding process, as appropriate.

4.2.a.iii Workers' Organizations

UNICARIBE complies with local legislation that recognizes the rights of workers to form and join labor organizations. It also acknowledges all employer responsibilities derived from such legislation, including international conventions and ILO treaties related to workers' rights signed by the Dominican Republic (Convention No. 87 concerning Freedom of Association and Protection of the Right to Organize and Convention No. 98 on the Right to Organize and Collective Bargaining).

4.2.a.iv Non-discrimination and Equal Opportunity

The Dominican Republic is a signatory to several ILO international conventions and treaties related to workers' rights, including Convention No. 100 on Equal Remuneration and Convention No. 111 on Discrimination (Employment and Occupation). As part of its HR policy, UNICARIBE establishes the corporate values of respect for individual diversity and equality, proceeding with justice, fairness, and impartiality, seeking a positive and inclusive social impact.

4.2.a.v Grievance Handling Mechanism

UNICARIBE has a grievance handling mechanism, channeled through the Human Resources Department. Nevertheless, it will adapt this mechanism so that it: (i) provides a culturally appropriate and easily accessible system at any time (e.g., an external mailbox or PO box with printed or digital forms to record the grievance or complaint); (ii) allows for complaints and inquiries to be received and processed anonymously; and (iii) does not limit any enforceable legal or administrative remedies under local national labor regulations or laws.

4.2.b Workforce Protection

The Dominican Republic is a signatory to several ILO international conventions and treaties related to workers' rights, including Convention No. 138 on Minimum Age, Convention No. 182 on the Worst Forms of Child Labor, Convention No. 29 on Forced Labor and Convention No. 105 on the Abolition of Forced Labor. Moreover, the country has an extensive labor legislation that regulates, among others, aspects such as the length of the working day, working hours, overtime, paid rest days, minimum wage, family allowance, legal rewards, and minimum health and safety at work.

4.2.c Occupational Health and Safety

In compliance with the Occupational Health and Safety Regulations (Decree No. 522-06 and Resolution No. 04/2007), UNICARIBE will prepare an occupational health and safety management policy to safeguard the health and safety of employees, contractors, suppliers and the communities in which the Institution is located, with appropriate actions to prevent and avoid accidents and damages to health. This policy will establish: (i) a management system to detect, identify, evaluate, control and avoid risks, and ensure accident-free working conditions throughout the value chain; (ii) the obligation of all employees, contractors, suppliers and visitors to comply with all enforceable occupational health and safety laws, regulations and legal obligations in the countries in which it operates; and (iii) the obligation that all employees, contractors, suppliers and visitors take responsibility for their own safety while conducting

their activities safely and in compliance with applicable health and safety standards, procedures and regulations.

UNICARIBE will also develop a Workplace Health and Safety Program (WHSP) for each new or operating site, which will include (i) the identification of possible risks to the occupational health and safety of workers in accordance with the work they perform; (ii) a risk assessment, risk map and intervention plan; (iii) details of the prevention and protection measures implemented; (iv) safety briefing sessions for visitors and occupational health and safety training for employees; (v) specific training for workers and emergency brigades; (vi) mandatory occupational health and safety medical examinations; (vii) procedures for statistical evaluation and reporting of occupational accidents and diseases; (viii) procedures and a mechanism to notify the most important stakeholders (response agencies, local authorities and IDB Invest) in case of fatalities or serious accidents; and (ix) a procedure to analyze the root causes of accidents in order to investigate the cause of incidents or accidents occurring at any of the sites and to ensure the implementation of corrective actions to avoid them in the future.

As part of its ESMS, UNICARIBE will prepare a procedure to monitor work accidents and evaluate statistics related to (i) accident rates, considering all incidents that produce loss of work and (ii) the nature and severity of each accident or incident, determined by the number of days lost in relation to the number of accidents and days lost.

In addition, as a result of the Coronavirus Disease 19 pandemic⁴ (COVID-19), the Institution will develop a COVID-19 Workplace Monitoring, Prevention and Control Plan, in accordance with the health regulations and sectoral protocols in force⁵ as of the declaration of the state of national health emergency by the National Government of the Dominican Republic. The plan in question will aim to: (i) establish workplace health monitoring, prevention and control guidelines during the pandemic; (ii) establish guidelines on returning to work; and (iii) ensure the sustainability of the surveillance, prevention and control measures adopted to prevent the transmission of COVID-19.

4.2.d Workers Engaged by Third Parties

UNICARIBE will prepare a Policy for Hiring and Rendering of Services by Third Party Personnel that complies with the Labor Code and the ILO's international conventions, allowing it to: i) ensure that the workers hired by its contractors belong to legally incorporated companies, are known to possess integrity and have an adequate environmental and social management systems compatible with the requirements of PS-2; ii) establish policies and procedures to manage and follow up on the performance of third-party employers; and iii) ensure that the workers hired by third parties have access to the grievance handling mechanism, either through the Contractor or the Institution. UNICARIBE will also prepare a training program on said Hiring Policy, to be undertaken by all personnel who hire external services.

4.2.e Supply Chain

UNICARIBE will prepare a Supplier Selection Procedure that includes the following (i) a questionnaire, to determine if suppliers comply with (a) labor and OHS legislation in force, in particular the prohibition of

⁴ COVID-19 is an infectious disease caused by the coronavirus discovered in Wuhan, China in December 2019 (<https://www.who.int/emergencies/diseases/novel-coronavirus-2019>)

⁵ Ministerial Resolution No. 239-2020-MINSA, which approves the "Guidelines for the health surveillance of workers at risk of exposure to COVID-19" and its amendments.

child and forced labor, non-discrimination, gender equity, and ensuring safe working conditions, and (b) enforceable environmental legislation, in order to minimize environmental impacts by controlling their air emissions, managing and treating liquid and solid waste appropriately, and consuming natural resources rationally in their processes; and (ii) a provision that blocks current or potential suppliers that do not comply with labor and OHS laws or environmental regulations (and therefore prevents the Company from doing business with them).

4.3 Resource Efficiency and Pollution Prevention

4.3.a Resource Efficiency

4.3.a.i Water Consumption

The Project doesn't have a high consumption of water, as its use will be limited to construction and human consumption by users and workers. Drinking water will therefore be supplied through the municipality's public distribution system, while water for construction activities will be provided by tanker trucks from authorized sources. On its part, the Institution will constantly seek to optimize the use of resources for its operations and will prepare and implement a program to raise awareness and reduce water consumption for each site including the following comprehensive savings measures: (i) adoption of better technologies to streamline processes (e.g., rainwater collection systems for different uses); (ii) monthly measurement and monitoring of water use at each facility to detect losses or excessive consumption; and (iii) operational procedures to be triggered upon any variation in normal water consumption, in order to verify and correct the cause, either by repairing leaks or replacing components.

4.3.a.ii Energy

The Project's execution will increase average energy consumption, and the sources will be the same as those that have been used so far (distribution network of the companies providing this service). However, UNICARIBE will prepare and implement an energy efficiency program that includes procedures to (i) identify fuel- and electricity-saving measures; (ii) analyze the use of alternative or renewable energy sources; and (iii) analyze and implement comprehensive energy saving measures, such as replacing low efficiency air conditioning systems with high efficiency equipment, installing LED lights, automating processes with adjustable logistic controls, applying conversion technology to maximize the efficiency of high demand equipment, such as industrial refrigeration and air conditioning, and using insulating and thermo-acoustic materials to reduce heat transfer and eliminate noise.

4.3.b Pollution Prevention

4.3.b.i Waste

To control liquid effluents, UNICARIBE's facilities and offices are connected to the public sewer system of the state-owned company Corporación del Acueducto y Alcantarillado de Santo Domingo (CAASD) and the Instituto Nacional de Agua Potable y Alcantarillados (INAPA).

At present, UNICARIBE separates and stores all solid waste produced at the facilities. The Institution will, however, develop and implement a solid Waste Management Program that (i) promotes reduction, reuse and recycling, and (ii) classifies and registers its solid waste as: organic (waste from kitchens and cafeterias, which correspond to damaged products that are discarded), recyclable (cardboard, paper,

plastics, wood, metals, etc.), and non-recyclable. All waste will be subsequently handled by an authorized external supplier until its final disposal.

UNICARIBE will not transport its non-hazardous solid waste (domestic) off its premises; these will be managed by the services of the municipality or companies authorized for such purpose and in accordance with the provisions of the Environmental Management of Non-Hazardous Solid Waste Regulation (NA-RS-001-03).

4.3.b.ii Hazardous Waste Management

UNICARIBE does not and will not produce large quantities of hazardous materials. However, during the maintenance activities in each facility, depending on the task, the volume of this type of material could be significant. The Institution will therefore implement a Hazardous Waste Management Work Manual in order to identify, monitor, minimize, value and comprehensively manage the hazardous waste generated at each facility. Said Manual will also contain measures for the collection and temporary storage of each type of hazardous or infectious biological waste (in case of injured persons or medical emergencies). All this waste will be delivered to an authorized external supplier for final disposal.

The Institution will also prepare and implement a Standard for the Safe Storage of Hazardous Materials that complies with the Hazardous Chemical and Waste Handling Regulation, with a checklist for each hazardous substance according to its characteristics. Similarly, UNICARIBE will abstain from transporting its hazardous solid waste outside its facilities. Such waste will be managed by companies duly authorized for this purpose.

4.4 Community Health, Safety and Security

4.4.a Community Health, Safety and Security

UNICARIBE's new facilities will be designed and built by competent, experienced and renowned contractors who follow the industry's best international practices; they are expected to comply with national and international safety and construction guidelines, regulations and codes.

4.4.a.i Infrastructure and Equipment Design and Safety

Fire Protection Systems

According to the Regulations for Fire Protection and Safety⁶, the design of the Life and Fire Safety (L&FS) Systems of the Project's buildings and facilities must follow the international standards of the National Fire Protection Association (NFPA) and with the Dominican Republic's Disability Act (Law No. 5-13) and its Regulations (Decree No. 363-16) on accessibility-driven design.

UNICARIBE will hire qualified professionals to certify that the L&FS System design of the new facilities complies with the following: (i) the L&FS System requirements of the IFC's general guidelines on environment, health and safety; (ii) the L&FS System international code; and (iii) all applicable Dominican regulations in force. Furthermore, a qualified professional will certify that the buildings and facilities that are already in operation or the new ones that are about to start operating, have been built according to

⁶ Decree No. 85-11, modified by Decree No. 364-16) of the Ministry of Public Works and Communications (MOPC).

the approved designs and that all L&FS System equipment has been installed according to the design and tested according to international requirements.

Road Safety

Since the Project will lead to increased vehicular traffic in its vicinity—both in its construction and O&M phases—UNICARIBE, acting jointly with the relevant traffic authorities, will develop a specific Road Safety Management Plan for each Project site, which will define the actions needed to safeguard neighboring communities from the expected increase in vehicular traffic.

4.4.b Security Personnel

In the event that UNICARIBE hires security personnel to protect its assets, all signed agreements with the security firms will include provisions allowing the Institution to: (i) carry out reasonable investigations to ensure that the security personnel do not have a criminal record or history of abuse; (ii) check the details of the necessary training on the possible use of force; (iii) check the restrictions and procedures to be used in the case of personnel carrying firearms; and (iv) check the details regarding environmental and social awareness training, which also includes human rights issues.

4.5 Land Acquisition and Involuntary Resettlement

The Project will be developed on owned land acquired through a private purchase agreement/contract; therefore, it does not involve any kind of involuntary physical or economic displacement.

4.6 Biodiversity Conservation and Natural Habitats

The Project will be developed in the Institution's own land, previously intervened and located in urban areas of Santo Domingo and Monte Plata. No impact on biodiversity or any critical habitat is expected in this regard.

4.7 Indigenous Peoples

The Project will take place in the cities of Santo Domingo and Monte Plata, in urban areas where there are no indigenous peoples.

4.8 Cultural Heritage

4.8.a Chance Find Procedure

The site selected by UNICARIBE for the construction of the Monte Plata Campus is a previously intervened area with no past records of archaeological or cultural finds. However, as some of the tasks foreseen in the Project involve excavation or earthworks, UNICARIBE will prepare a Chance Find Procedure and implement and execute an archaeological monitoring plan.⁷

⁷ The Chance Find Procedure involves a project-specific procedure that outlines the actions that must be taken in the event of finding any previously undiscovered cultural heritage items.

5 Local Access of Project Documentation

UNICARIBE offers additional sustainability information on its website:
<https://unicaribe.edu.do/unicaribe/investigacion-e-innovacion/unidad-de-gestion-de-riesgo/>