SKYWAY HOSPITALITY – MEXICO
Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Product	Delivery Date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Permits	1. Obtain the authorizations regarding environmental impact and change of land use in forest land for the entire Project.	1. Copy of the resolutions.	1. Condition precedent to the first disbursement.
1.2	Policy	2. Develop a comprehensive environmental, social, and occupational health and safety (HSSE) policy that establishes the environmental and social performance expectations of the Project.	2. Comprehensive HSSE policy.	2. Condition precedent to the first disbursement.
1.3	Identification of risks and impacts	1. Develop a procedure to identify, characterize, and evaluate the environmental and social (E&S) and occupational health and safety (OHS) risks and impacts generated during construction.	1. Risk and impact identification procedure.	1. Within the first 30 days before the first disbursement.
		2. Prepare and keep updated risk matrices for the Project.	2. Risk matrices for the Project.	2. 30 days before the first disbursement and then as part of the Environmental and Social Compliance Report (ESCR).
		3. Carry out a physical risk analysis under climate change scenarios aligned with the Task Force on Climate-related Financial Disclosures (TCFD).	3. Physical risk analysis aligned with the TCFD.	3. Within the first 90 days after the first disbursement.
		4. Implement necessary adaptation measures derived from the results of the physical risk analysis under climate change scenarios.	4. Evidence of implementation of measures.	4. As part of the ESCR.
1.4	Organizational capacity and competence	5. For the construction phase of the Project, hire professionals to cover E&S, OHS, and community liaison positions.	5. Copy of the signed contracts with each hired professional.	5. Within 30 days after the first disbursement.
1.5	Environmental and Social Management System (ESMS)	1. Evaluate the effectiveness of the ESMS based on the performance indicators of its management plans and the results of internal and contractor audits.	1. Evaluation report.	1. Within the first year from the date of the first disbursement.
		2. Implement, where applicable, the corrective or adaptive actions required to ensure the improvement of the ESMS.	2. Evidence of implementation.	2. Within 60 days after the completion of the evaluation exercises.
1.6	Stakeholders	1. Update the Community Engagement Strategy, applicable to the construction and operation phases of the Project, to: i) add the methodology for stakeholder identification and mapping; ii) include the complete identification and mapping of stakeholders and affected communities; iii) establish the types and frequencies of interaction according to the group; iv) describe communication strategies with stakeholders; and v) specify roles and responsibilities for implementing the strategy.	1. Updated Community Engagement Strategy.	1. Within 60 days after the first disbursement.

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1.7	External grievance mechanism	1. Prepare an External Grievance Mechanism (EGM) that defines objectives, scope, roles, reception and registration channels, including anonymous complaints, eligibility and prioritization criteria, response times, follow-up, closure, appeal, and documentation with evidence of the management of each case.	1. External Grievance Mechanism.	1. Within 30 days after the first disbursement.
		2. Disclose the External Grievance Mechanism (EGM).	2. Evidence of disclosure.	2. Within 60 days after the first disbursement.
1.8	External communications	1. Publish, on the Project's website, copies of the final versions of the MIA and ETJ.	1. Evidence of publication.	1. Within 90 days after the first disbursement.
1.9	Emergency preparedness and response	2. Ensure that the construction contractor develops and implements a construction emergency response plan.	2. Emergency response plan for construction.	2. 30 days before the first disbursement.
PS 2: Labor and Working Conditions				
2.1	Human resources policies and procedures	1. Ensure that the construction company and the operator have a human resources policy or internal labor regulations that, among other aspects, stipulate working conditions, including working hours, salaries, overtime, compensation, and benefits granted, in addition to the information contained in individual worker contracts.	1. Human resources policy or internal labor regulations	1. Before the first disbursement.
		2. Disseminate labor policies or regulations to all direct workers, contractors, and subcontractors.	3. Evidence of dissemination.	2. Within 60 days after the first disbursement.
2.2	Internal grievance mechanism	1. Prepare an internal grievance mechanism (IGM) for workers that allows them to raise workplace concerns and grievances related to labor conditions, without fear of retaliation, applicable to direct employees, contractors, and subcontractors	1. Internal Grievance Mechanism	1. Within 30 days after the first disbursement.
		2. Disclose the IGM	2. Evidence of dissemination	2. Within 45 days after the first disbursement.
2.3	Occupational health and safety	1. Finalize the Construction Health and Safety Program	1. Construction Health and Safety Program completed.	1. Before the first disbursement.
2.4	Supply chain	1. Incorporate labor, environmental, and social prequalification criteria into the Supplier Selection Policy, including: (i) signed consent to Skyway Equities' Code of Ethics and Conduct and the comprehensive HSES policy, (ii) supplier evaluation and classification mechanisms according to their environmental and social risk level, (iii) documentary requirements and self-assessment processes for medium- and high-risk suppliers, and (iv) contractual clauses that allow for corrective actions to be required or business relationships to be suspended in the event of serious non-compliance.	1. Updated Supplier Selection Policy	1. Within 90 days after the first disbursement.

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PS 4: Community Health and Safety				
4.1	Community health and safety	1. Prepare and implement a Traffic Management Plan	1. Traffic management plan	1. Within 90 days after the first disbursement or before the circulation of heavy machinery to the site, whichever comes first.
		2. Hire a qualified Life Safety and Fire Protection (LSFP) professional to certify: (i) that the works were constructed in accordance with the approved LSFP designs; (ii) that all equipment was installed according to the LSFP design; and (iii) that all LSFP equipment was tested following international requirements.	2. Certification.	2. Before the Project commences operations.
PS 6: Conservation of Biodiversity and Sustainable Management of Living Natural Resources				
6.1	Natural habitat	1. Prepare a Biodiversity Action Plan containing the strategy for achieving no net loss of biodiversity	1. Biodiversity action plan	1. Within 180 days after the first disbursement.
PS 8: Cultural Heritage				
8.1	Chance finds	1. Prepare a Chance Finds Procedure.	1. Chance Finds Procedure	1. Prior to the start of construction and earthworks.
		2. Disseminate the plan to workers responsible for earthworks	2. Evidence of dissemination and training.	2. 15 days before the start of earthworks.