



TROGÓN LODGE
SAN GERARDO DE DOTA



MANUAL OF APPLICABLE LAWS AND SUSTAINABILITY
USED BY:
GRUPO MAWAMBA & TROGON LODGE
2014 - 2016





OUR FILOSOPHY

Grupo Mawamba employees work under the philosophy that has come from senior management, to “provide services in the utmost personalized, hospitable and unique way”.

It also seeks that potential tourist attractions go parallel to the ideology of its staff and the tourist products that are already an operational reality.

MISSION

“To be a company that is based on sharing with the customer through the true tradition of hospitality that characterizes us as Costa Ricans and simultaneously transmit the respect towards the country’s natural resources. In addition, building on a fundamental pillar: to provide a decent life for our employees and their families, as we are convinced that if our employees are well, they will provide a much higher quality of service”.

OUR VISION

“To maintain a firm position and to consolidate our company as a chain of travel services throughout the country, under the premise, 100% Costa Rican capital, through family reinvestment”.



OUR VALUES

As this is a family owned and operated company, the values have been the same, since its foundation, under which we have forged our beliefs to encourage good behavior in the dynamics of tourism.

- Honesty.
- Transparency.
- Quality of service.
- Personalized service.
- Protect the natural resources.
- The tradition of Costa Rican hospitality.
- To support the local residents that works in our hotel.
- Respect all employees, clients and providers at all times, to live in harmony with the community.

CODE OF CONDUCT FOR THE PROTECCION OF YOUNG GIRLS, BOYS AND ADOLESCENTS AGAINST COMERCIAL SEXUAL EXPLOITATION IN TOURISM TRIPS.

Trogón Lodge forms part of the "Code of conduct for the protection of young girls, boys and adolescents against commercial sexual exploitation" since May 2006. From the very moment that we made this decision, we engaged in a great responsibility with the children of our country, it is for this reason that any and all of our employees have the right to reject any suspicious situation that involves under aged children that arrive on the lodges premises.

ENVIRONMENTAL POLICIES

From the beginning stages of the design process of the infrastructure of the lodge, we tried to create a design that does not require overuse of land, this in order not to invade or damage the primary forest ecosystems and the life that inhabits therein. Because their owners have always shown great respect and concern for the environment.



ECOLOGICAL BLUE FLAG/ EBF IN ENGLISH (BAE ABBREVIATION SPANISH)

Trogón lodge has been prized with the BAE in 2013 through 2015 in the category of micro-Watersheds in the area of the Rio Savegre. Trogón Lodge has an approximate length of 1,000 meters of river from the Rio Savegre alongside its property, considered one of the cleanest in Central America. Within the registered area can be mentioned as reference points the two main entrances to the lodge, being one of the most important, since it is practically the first contact with some type of infrastructure and possibly first sources of contamination from its source down river.

The geography is typical of the region, very broken, and similar to the surrounding region near the Cerro de La Muerte mountains, with approximately 90% of the primary forest being protected, making it a haven for all natural life.

Within the lodge and throughout the river, there are different "zones & forms" of life, which can highlight the tropical rainforest, also called higrofilites, which is all life that lives in a where there is large amounts of moisture present.

Among the most noticeable species of the region, we can mention a few: mammals like the tapir, puma, jaguar, wild bores, many bird species like the resplendent Quetzal (mocinno pharomachrus), black guan (Chamaepetes unicolor) and emerald toucan (Aulacorhynchus prasinus), in flora, oak (Quercus s.p.) and the mountain aguacatillo (Ocotea Tenera).

CERTIFICATION FOR TOURISTIC SUSTAINABILITY

Grupo Mawamba has decided to opt for the certification for sustainable tourism, as we have always operated with different environmental practices of great importance. Our commitment is to work together to clearly reach our objective and or reduce any negative impact that could be caused the natural resources, the local culture o society. The lodge is committed to use the natural resources adequately for mutual benefit for the company and local community.

That is why we implemented an Environmental Management System (EMS), (Sistema de Gestion Ambiental / SGA) in Spanish, which set as its main objective to convert the concept of sustainability into practical and necessary in the context of the tourism competitiveness of the country, with a view to improving the way we think that natural and social resources are used, the idea is encourage the active participation of local communities and provide new support for the competitiveness of the business sector.

It is considered a must educate the tourist environmental impacts, so in the informative guide for the host, invite the customer to join this program through the following actions:

- Turn off the light when leaving the room or take advantage of natural light.
- Use the heating only when necessary.



- Re-use towels.
- Being involved in sustainable programs that the lodge offers.
- Recycle solid waste.
- Visit national parks or nature reserves near the region.
- Do not feed the animals.
- Do not remove plants.
- Maintain silence in nature reserves to not scare the animals.
- In consideration for non-smokers, you are asked to respect the non-smoking areas.



THE THREE MAIN PILLARS TO ACHIEVE SUSTAINABILITY

Trogón Lodge is aware of the fact that it produces an impact on the environment and society, as a pressing need, the management implements within its priorities, Environmental Management System (EMS); oriented in the reduction and mitigation of all environmental and social impacts that the company may produce as a result of their activities.

The administration makes public our commitment to this environmental policy, which becomes the starting point to guide all actions of the organization and likewise to define its goals and objectives towards the attainment of good practices concerning sustainability of the environment, the economy and society.

Trogón Lodge assumes the following commitments and ensures conduct and monitoring and constant updating of the same, this in order to achieve continuous improvement of company performance with the environment.

- **Natural resources:** are used in a sustainable manner, promoting its conservation and rational use; the way that most actions comply with applicable environmental legislation.
- **Economical Activities:** will be viable in the long term and its benefits will be distributed to all involved in an equitable manner.
- **Social-Cultural authenticity:** activities, products and services produced by the lodge will be oriented to disseminate and preserve the countries cultural diversity.

ENVIRONMENTAL POLICY TROGÓN LODGE

Upper management is aware and concerned about both positive and negative effects that may cause its tourist activity in the community, environment and the economy is heading towards a sustainable model for growth in balance with the environment around us and at the same time subsist in time.

In line with this policy, these actions have been implemented: participate in sustainable programs as Ecological Blue Flag (BAE) and certification for Sustainable Tourism (CST), to convert our definition of sustainability into something real.

Trogón Lodge makes public awareness of its commitment with the following environmental practices:

- To protect the valuable forest reserve, which has primary and secondary forest which has been reforested during the past 10 years.
- The construction area of the lodge, does not exceed 10% of the total size of the farm, so that you can protect the surrounding area, and construction is concentrated in one particular area. Therefore, if there is the need for growth, in the future we will continue with this growth pattern.
- Protect Río Savegre from contamination that may affect it.



- Planting trees that attract wildlife.
- Instead of using contaminating herbicides, use natural repellents.
- Recycle all solid waste that is generated from the lodge's daily operation.
- Use of raw materials more than 50% of organic produce grown by ourselves for the restaurant.
- Handle organic waste for and create composting material.
- Consume, as much as possible, local products such as honey, fruits, and vegetables, among others.
- Recycle cooking oil, to convert it into biodiesel.
- Use only cleaning products and cosmetics that are biodegradable.
- Re-use all paper possible.
- Reduce consumption of water and electricity.
- Choose, whenever possible, providers who use our green philosophy.
- Guide our operations, employees and customers to comply with the law applicable to the country.
- Comply with environmental legislation for Costa Rica.
- Follow up on all above issues to achieve all the goals and objectives we have set ourselves and continue to growing.



APPLICABLE ENVIRONMENTAL LEGISLATION AND OTHER REGULATIONS

Grupo Mawamba, and specifically Trogón Lodge is aware that the activity they are dedicated to is bonded to a group of laws and regulations among which, the following stand out: Law # 7600 of equal opportunities for people with disabilities, law of conservation of wildlife law against sexual harassment in the work place, Law on National Archaeological Heritage, Environment Law, Forest Law, Law against sexual exploitation of minors, narcotics Act and illegal substances, regulation of public use of protected wildlife areas, CITES regulations, and regulations of cataloging and characterization waste. In addition, ALL policies of the National Institute of Tourism (ICT) are made aware of known.

ENVIRONMENTAL LAW NO. 7550 AND REFORM LAW NO. 7575

The aim of this law is to provide, Costa Ricans and the State, with the necessary tools to achieve a healthy and ecologically balanced environment. The State, through the application of this law, defend and preserve that right, in search of greater well-being for all inhabitants of the nation. The environment is defined as the system built by different natural elements that compose it and their interactions with humans.

NATIONAL ARCHAEOLOGICAL HERITAGE LAW NO. 6703

This law states, that National Heritage archaeological, movable or immovable elements, resulting from prior or contemporary to the establishment of Hispanic culture in the country, as well as human remains, flora and fauna, related with these indigenous cultures. All person who own artifacts or lots, which this law defines as archaeological national heritage, will be responsible for its preservation. In case of damage, loss of this, the person should immediately communicate the case to the National Museum, so that the necessary measures relating to the conservation, restoration or recovery are taken.

RECOMMENDATION ON THE CONSERVATION OF CULTURAL ACQUISITIONS THAT PUBLIC OR PRIVATE WORKS MAY ENDANGER

The general conference of the United Nations for education science and culture determines“ the expression of cultural property, to be applied: properties such as archaeological, historical or scientific sites, buildings or other structures of historical, scientific, artistic or architectural value, religious or secular, even groups of traditional buildings, historic districts of urbanized and rural areas and the vestiges of past cultures that have ethnological value. It applies to buildings of the same character that constitute ruins on the ground as well as archaeological remains found beneath the surface of the earth.

Movable assets of cultural importance including those found in real estate or have been recovered from them, and those who are buried and can be found in places of historical or Archeological interest elsewhere.



Natural assets covers not only the places and monuments of architectural character, archaeological or historical recognized and registered as such, but also the vestiges of past unrecognized, unrecorded, as well as the recent sites and artistically or historical importance.

Convention on measures to be taken to prohibit and prevent the import, exportation and transfer of Ownership of Cultural Property.

Objects, on religious or secular grounds, is specifically designated by each State as being of importance for archeological, prehistory, literature, art or science are regarded as cultural property.

The states of the Convention recognize that the import, export and transfer of ownership of cultural property is one of the main causes of the impoverishment of the cultural heritage of the countries of origin and owner of such property and that international collaboration is one of the most effective measures to protect their cultural property against all the dangers resulting therefrom.

WILDLIFE CONSERVATION LAW NO. 7317

RECENT REFORMS:

LAW NO. 7495 FROM MAY 3, 1995 / LAW NO. 7497 OF MAY 2, 1995

It aims to establish regulations on wildlife. The wildlife is made up of the continental and insular fauna living in temporary or permanent natural conditions in the country and flora living in natural conditions in the country. These can only be given special appropriation and trade through the Issues under contained in public treaties, international agreements, the current law and its regulations.

LAW ON INLAND SEA AREA NO. 6043

Maritime zone is the strip of land two hundred meters wide all along the Atlantic and Pacific coasts of the republic. It consists of two sections: public area, which is the strip of fifty meters wide, which is to include the high tide and the areas that are exposed at low tide: and the restricted area, consisting of the remaining strip of one hundred fifty meters or other grounds in cases of islands. Use and exploitation are subject to the provisions of this law. Corresponds to the Costa Rican Tourism Institute (ICT), on behalf of the state, upper and general supervision of all matters

NATIONAL PARK LAWS NO. 6084

Law No. 7152 created June 5, 1990. Turns over the National Park Service to the ministry of environment and energy, which will have the specific function of the development and management of national parks for conservation of the natural heritage of the country.

ARTICLE No. 2 - Correspond to the National Park Service study areas of the national territory for the



preservation of native flora and fauna, for the establishment of national parks.

REGULATION ON AIR POLLUTANT EMISSION FROM BOILER TYPE & INDIRECT OVENS (NS 36551-S-MINAE-MTSS)

Considers:

That increased pollution, mainly in the large metropolitan area, and adjacent zones, requires urgent action to achieve its suitability within maximum tolerant levels in order to avoid health issues to the population and the environment.

The potential of air pollution generated from the industrial and commercial emissions and service activities, justifies the adoption of strict measures to control air quality, emission levels of pollutants, fuel quality and fuel use, manufacture, repair and homologation of engines, energy transformation or other fixed and mobile emission sources.

GENERAL HEALTH LAW NO. 5395

The health of the population is of public interest, protected by the state. The role played by the State is essential to ensure the health of the population.

It is the ministries of health responsibility to, train, plan and coordinate all public and private health-related activities.

INTEGRAL MANAGEMENT LAW FOR WASTE, LAW NO. 8839

This law aims to regulate integrated waste management and efficient use of resources through the planning and execution of regulatory actions, operational, financial, administrative, educational, environmental and health monitoring and evaluation. Guarantee the right of everyone to enjoy a healthy and ecologically balanced environment as well as protecting public health.

WATER

WATER LAW

Law No. 276, dictated August 27, 1942. It corresponds to regulate all matters related to the waters of public and private domain.

ARTICLE No. 1 - considers the waters of the rivers and their direct and indirect tributaries from the point of source to its mouth waters are considered public domain or national property. Moreover, this law refers to the obligation of every public institution to have environmental protection programs for forests, stating that all authorities in the country are obligated to provide for their means strict com-



pliance with the legal dispositions concerning conservation of trees, especially on the banks of rivers and water sources, prohibits the cutting of trees located less than 5 meters away from the rivers and their tributaries.

DECREE NO. 26042-S-MINAE

Considers:

1. To protect the water resource is to protect the health of humanity and life on earth, and is an essential element for achieving sustainable development.
2. Being the pollution of waters one of the problems of greatest negative impact on our environment, is a priority for control measures for the discharge of pollutants in springs, rivers, streams, creeks permanent or nonpermanent, lakes, ponds, marshes, natural or artificial reservoirs, estuaries, mangroves, swamps, pipes, freshwater, salt waters, and generally in all national waters.

PROTECTED AREAS

FOREST LAW

Law No. 7575 of February 05, 1996 regulates for the forest heritage of the state and private and public activities that may affect it declares protection of areas and prohibits in them, the cutting or removal of trees, except for projects, work or activity declared of national interest by the executive power.

The regulations to the forestry law, Executive Order No. 25721-MINAE establishes as an entity to run the Ministry of Environment and Energy, through the National System of Conservation Areas, there is also the regional agreement for the management and conservation of ecosystems, and natural forest approved by Costa Rica by Act No. 7572 of February 01, 1996.

SOLID WASTE AND LIQUIDS

ACT INTEGRATED MANAGEMENT OF SOLID WASTE

It is to regulate integrated waste management and efficient use of resources through the planning and execution of regulatory actions, operational, financial, administrative, educational, environmental, health monitoring and evaluation.



RULES OF USE AND RE USE OF SEWAGE

Regulation No. 33601 is aimed at the protection of public health and the environment, through an environmentally sound wastewater management establishes the obligation to treat wastewater, as well as the presentation of operational reports when the effluent is discharge to a receiving body or sanitary sewer or re-used.

BIODIVERSITY

BIO DIVERSITY LAW

Through promulgated law No. 7778 April 30, 1998 is intended to promote the use and conservation of biological diversity elements. This law has as general principles respect for life in all its forms, ensure access and distribution of benefits in the use of bio diversity related elements, respect for human rights, respecting the options of future generations and democracy to ensure greater participation of all citizens in decision-making.

NOISE

REGULATIONS FOR NOISE POLLUTION

Regulation No. DE-28718-S created for the protection of people's health and the environment from the pollution levels of noise coming from artificial sources. This is sorted by defined areas where maximum noise level is set for each residential, industrial, commercial and leisure areas.

SOILS

LAW MANAGEMENT AND SOIL CONSERVATION

Both in this Act No. 7779 as its rules, the areas of management, conservation and recovery of soils in the country, starting from the basic criterion of Hydrologically manageable area as a unit defined, is a basin or sub basin overall and their specific to the required level cases. Regarding the definition of management plans, conservation and recovery of soil areas, taken as a basic criterion or sub basin watershed.

Also specified in relation to matters concerning water, the Ministry of Agriculture and Livestock (MAG in Spanish) shall coordinate with the national irrigation service and winnowing (SENARA in Spanish)



and any other competent institution hydrological research, hydrogeological and agrologic in the watersheds of the country and improvement practices, conservation and protection of soils in watersheds.

RATIONAL USE OF ENERGY

LAW REGULATING THE RATIONAL USE OF ENERGY

The aim of the law No. 7447 promulgated on November 3, 1994, proposes the creation of a mechanism to achieve this efficient use and replace them where appropriate to the country, considering the protection of the environment. These mechanisms should be based on three principles: the obligation to execute projects for the rational use of energy in companies with high consumption levels, control over equipment and facilities, because of its widespread use impact on energy demand and the establishment of a system to inform users of their energy consumption.

ALL OF OUR OPERATIONAL POLICIES

POLITICAL PROTECCION OF THE COSTA RICAN ENVIRONMENT

Through this policy philosophy and environmental policy complements the company, the Trogon Lodge identify the negative impacts generated by the operation of its business, with the desire to manifest changes, reduce or eliminate these impacts. This table should be updated impact each year, and so the result of the actions that were launched were verified. The hotel will arrange to inform their employees and guest's different ways to report to the respective authorities, illicit situations that threaten the environment, and you get to witness this.

Management will get involved and support activities to protect biodiversity, such as are planting trees, cleaning rivers, local recycling programs. Along with environmental activities planned every quarter, where employees, guests and suppliers will be invited to participate. We will participate in local organizations who care about the preservation of the environment. Trogon Lodge has certain programs, like saving water, electricity, waste reduction, among others, which together form part of an Environmental Management plan, and monitored by members of the Sustainability Committee.

The main office or Hotel headquarters is responsible for all the logistics of the hotel, working together on environmental & cultural issues with the Municipality of Belen, which is the closest local government.

POLICIES FOR GREEN AREAS



In the gardening and maintenance areas, we will make sure to promote the planting of native species belonging to the region. In addition, through the guidance, and planning of management, a plan to reduce introduced species and monitoring of these species, so they do not alter the natural ecosystem of local species.

The species of the garden must be identified according to their common and scientific name and its uses, for better identification by the customer and also a self-guide is provided with content of information of the most striking or attractive species, for the person who wants a tour of the hotel gardens.

The Lodge creates a green corner which consist of a small exhibition of photographs of the most representative species of flora and fauna of the region of San Gerardo de Dota, also in the rooms, paintings of the local flora, painted by a national artist. Finally it sets as hotel policy not to use chemicals in the gardens that affect the environment and health of people. Natural mechanisms are used to control pests or products natural organic products.

POLICIES ON NATURAL AREAS

The region of Los Santos is characterized by its scenic beauty, scenic roads, unique landscapes, rich flora and fauna. For this reason the company must protect these features that provide added value when making tourism in the region, to ensure the attraction of and displacement of groups in the future.

It is the employee's duty to provide useful information to guests and encourage them to make tourism in the area, in order to generate more income for host communities, as long as they facilitate and preach the good practices and regulations that must be followed in protected areas.

The company is committed to care for and safeguard protected areas that comprise Group Mawamba and rather seek growth, care of local plants, forest and wildlife attraction.

As another policy, there is no plans in planning infrastructure expansion and growth, it is not planned to stay under the same philosophy of personalized service and differentiated tourism, aware that the trip will generate an ecological footprint.

The administration is committed to publicize and implement the management plan for tourist groups, where capacity, tours, use of regulations of protected areas, manuals for the tour guide is provided, among other information provided, to ensure the activities are sustainably related.

POLITICAL PROTECCION OF THE FLORA AND FAUNA



This document is the general policy established by the company Mawamba Group (Trogón Lodge and Mawamba Lodge), for the promotion and protection of the Costarican flora and fauna, and to protect the natural national heritage, under any circumstances the extraction be permitted of any wild species from its original habitat. It shall be ensured to safe guard this wealth and provide knowledge of their importance to protect, and pass this on tourists and employees.

No species will be kept in captivity to be appreciated by tourists, nor support places that perform this type of practices.

Although two artificial canteens are located near the restaurant, management chooses to gradually eliminate them, in order not to cause more serious damage to birds by cutting off the food source from one day to the other.

Night lighting of the lodge, is of low intensity, only the trails leading to the rooms and common areas are illuminated, no lights reflect directly into the surrounding forest.

Under the context of environmental relaxation and contact with the environment, no noise pollution that may affect the guests or the natural behavior of animals is generated, referring to the lawn mower, this should be used only when necessary and lapses of one hour per day, preferably from 10-11am.

During the tourist activities, we will ensure that no animals are to be fed or plants removed by staff or visitors, nor sound recordings of birds like the quetzal is permitted to attract them, as this alters their behavior.

In the souvenir shop, there shouldn't be any selling of products that come from endangered species of any kind.

The company will release its environmental manual with regulations, in order to publicize terms and laws applicable to the country and the related issues with the environment.

From 2015, an agenda of activities was created, where each month we participate in activities related to the protection of the environment. The focus is to organize with other companies to undertake the activities under this same guidelines.

GENERAL POLICY ON ARCHAEOLOGICAL, ARCHITECTURAL, HISTORICAL AND CULTURAL HERITAGE PROTECTION.

The archaeological, architectural, historical and cultural heritage is the essence that characterizes the identity of the Costa Rican, so it is a duty of each company to safeguard these fundamental features for future generations.

The company will seek to engage with organizations or associations to take charge of seeking the retention time of these Heritages, to have a guide in order to convey to their external and internal



customers the importance of protecting one's identity, and thus achieve cope with globalization and all its consequences. A simple and necessary way is to walk hand in hand with the municipalities of each area by encouraging and supporting local activities of this kind. In addition, training for employees about the protection and respect for living cultures, will be promoted, so that they have bases and information to guide and advise tourists about the rules and traditions that people should follow when visiting an indigenous community or Costa Rican community.

Also, we have procedures in place for reporting any kind of commercialization of parts of national value, which are accessible to employees and guests alike.

CLIMATE CHANGE POLICY

Climate change is a problem that affects all persons and all economic industries, and tourism is not excluded from this problem, because sudden changes in climate that prevent the movement of tourists to their destinations, the loss of flora and fauna, are some of the direct consequences of this.

Grupo Mawamba is aware of this, and we therefore perform actions that contribute as a change in favor of stopping all these damages, including:

- Planting Trees.
- No transport is used to mobilize tourists to Trogón lodge, since every tourist arrives on their own means of transportation.
- Ecological license plate tags are purchased for the companies vehicles and open the possibility for other collaborators to purchase them as well.
- Nearby forests are protected and those belonging to the company.
- The Savegre River basin is protected.
- Training related to climate change are created for employees, to educate themselves on the subject.

In addition, we have as a project to create an ecological footprint, to offset the greenhouse gases, so the lodge will become carbon neutral.

WATER SAVING POLICY

The hotel business requires a large consumption of water, which is why it is necessary to sensitize the staff and guests to collaborate with the different programs available at the lodge.

Water consumption is monitored weekly, and data are carried in logbooks, in addition, inspections of the pipes are made to verify that they all are functioning properly. According to gathered data, consumption reduction goals are then projected.



Rainwater that is captured by the hotel gutter system is taken advantage of and used to fill the ponds. In the rooms there are water filters on faucet taps in order to reduce the flow of the main source, and the lodge has invested toilets that require less water per flush.

Those responsible for keeping track of water consumption is the hotels committee for sustainability. An analysis for the water cleanliness, is performed every 6 months, so that the water consumed, also an analysis is performed and has a certification of the water in the ponds being poured into the river.

ENERGY SAVING POLICY

Through this policy it states that the energy Consumer goods will be monitored monthly by meter, and clean energy source, which comes from wind powered towers obtained through Coopesantos (local cooperative association), which have a project in the area.

In the energy saving plan the hotel and main offices take measures to reduce consumption by department, thus establish objectives, targets and incentives for participating partners contributing ideas and who are committed to the established program.

The Sustainability Committee will be responsible for taking control of the program and ensure that everything goes well and take corrective action if necessary.

The rooms and public areas, such as restaurant, cafeteria and reception are designed to make the most use of natural light.

All lighting was replaced by low-energy bulbs, it was a gradual process where the changes were done by sectors. The lodge has made the investment of a solar panel, but this did not result, due to the weather conditions in the area.

The hot water is transported every two rooms by a system installed close to each block, in order to avoid losing heat while water is brought to its final destination. Washers are used, when they are at their maximum potential in order to save water and energy, and thus perform fewer shifts. The sun light is taken advantage of to dry the bed sheets for the lodge beds.

WASTE MANAGEMENT POLICY ON ORGANIC & INORGANIC WASTE

Since about three years ago, Trogón Lodge created their own recycle program which has also been adopted by the local school of the town of San Gerardo de Dota, providing the school with labeled trash containers for the correct disposal of all waste.

In each room block there are trash dispensers so the clients can also participate in the program. The recycled waste is then transported to the local recycling center (CoopeDota) which is the closes loca-



tion, and one of the most well-known recycling centers in the country. At the lodge there is a designated area where waste is put so no bad odors are present to our guests.

Also, there is a manual that was made with the intention to guide our employees, so the correct separation of materials is done right, and choosing ecologically conscious suppliers.

The plan for waste is monitored by the sustainability committee along with collaboration of the employees, this must go hand by hand, and must be updated, and adapted as time goes by.

WASTEWATER POLICY

The company will have the task to make sure that the residual waste waters (black and gray), have adequate treatment, that does not harm the soil or nearby rivers.

Grease traps have been built which are monitored daily for proper maintenance and operation so sewage is carried to septic tanks, where a control is carried out, when necessary bacteria that contribute to the process is used .

Cooking oil is reused and taken to be converted into biodiesel, the oil is never dumped into the sinks to avoid contamination.

Cleaning products and cosmetics used in laundry department for the rooms, are biodegradable, so as not to pollute rivers with chemicals.

Rainwater is captured taken to the lodge ponds, these do not damage or alter in any way the environment with poorly managed water sources.

To finish off, we have a project set, to establish the treatment plant for hotel wastewater in the coming years.

TRAINING POLICY

Through the following policy, the Grupo Mawamba staff should receive training in and have a sustainability committee, participating in regular meetings seeking to innovate and collaborate with monitoring the different programs developed.

Incentives have been established for each Program in which employees can participate. It seeks to involve the families of staff members, to create a chain that can contribute to the welfare of the environment. In the evaluation, the effort that each employee will be measured to provide additional benefits to people who are leaders of in improving processes, quality, and customer service among others.

The company's obligation is to provide briefings or training to the persons employed, who will be guided by people from the same company to transmit the necessary knowledge to new employees



and making sure they are well informed.

Techniques have been developed, as an assessment tool for training, this will be applied every time you carry out a staff training, to measure the effects generated and if knowledge is useful for the area where this person is a part of.,

It is necessary to train personnel annually on the following topics: quality of service, customer profiles, environmental conservation, social topics, professional and personal development, applicable legislation, attention to people with disabilities, code of conduct, living cultures and profiles of international tourists and other topics displayed. These issues should be reinforced when necessary.

GENERAL POLICY ON CONSUMER PRODUCTS

Shipping and receiving department, has designed a procure manual where the parameters are provided when selecting new suppliers, which verify that the companies and products have environmental / health certifications or list of providers that includes the characteristics, properties and reasons why they were chosen for our shipping & receiving department.

Any product that provides some prejudice, the environment or someone who consume it, will be rejected and under no circumstances may be consumed on the premises.

In reference to the promotional material, this shall be printed by suppliers with green technologies found either in the inks, paper or equipment used. Paper should be re-used as much as possible, all new purchase must be recycled, all paper that cannot be re-used will be sent to the nearest collection center. The purchase of disposable products will be almost zero, because the hotel does not need these to operate.

FOOD AND BEVERAGE POLICIES

At the lodge restaurant, the products used for consumption, are fresh as they can possibly be, and these are locally / organically produced and better yet, they are grown in a hydroponic garden, free of pesticides. The main dish is the typical options, so the client can experience the local cuisine, for example the varied flavors of jams, honey, gallo pinto (local dish), trout, natural fruit drinks and coffee.

The restaurant menu will provide a description of the products for each of the options offered, and if the plate selected comes from the lodges garden, this with the purpose to inform the client, which provides an added value to the cuisine experience.

Also linked to the shipping and receiving department is the selection of large, recycled containers that can be re-used as much as possible to reduce the production of solid waste.

The dishes used at the lodge are made of glass, avoiding the use of materials such as plastic, car-



ton or styro-foam. Should a client need to take the meal with them, this will be packed in a recycled bio-degradable container.

It is prohibited to consume any specie that is on an endangered species list, or have been fished out of the river by illegal or irresponsible fishing. It is permitted to consume and prepare trout, which are raised and produced at the lodge.

POLICY ON CLEANLINESS AND PRODUCTS USED

Trogón Lodge has set the following policies on the cleaning products used :

The products used in the laundry department, kitchen and cabins are bio-degradable, and have the certification.

The liquid hand soap (located in the rooms and public areas), shampoo, conditioner and body gel are available in re-fillable dispensers, which are not filled to the limit, but only half way, so it is no wasted or misused by guests.

Personnel is trained continuously on the manipulation and quantities used of the bio-degradable products, to avoid mis-usage due to lack of information.

POLICY ON FISICAL CONDITION FOR LABOR ACTIVITIES

The company will provide lodging, meals, laundry facilities, flexible work itineraries, permission from work when ill, for those employees that live far away or have continuous work schedules.

There are established areas for storage of restaurant materials and employee lunch rooms. At the lodge, some of the activities offered are canopy tours, bird watching. There are operational manuals available for the wellbeing of employees and clients.

POLICY ON PROPER FACILITIES IN CASE OF AN EMERGENCY

The company is concerned about their employees and clients, so we have taken the task to make sure that all evacuation points are well identified is case of an emergency.

A control of the fire extinguishers is made to make sure that these are not expired, drills with extinguishers that must be changed are made, taking advantage of them to train staff in proper handling.

In each room there are gas detection systems, that will activate in the event of a gas leak that can harm a person's health. There is also an insurance policy that protects all guests integrity who are staying at the hotel.

POLICY ON OTHER SECURITY ELEMENTS



Inside Trogón Lodge property, all areas that can produce some kind of damage to any person have been made visible throughout to avoid working class accidents.

All signals and promotional information of the company does not damage or alter the environment where they are installed in and must be in compliance with the rules directed by the Ministry of Public Works and Transport.

A contribution is made with association's and local communities so that the well-being of visitors, like for example those in charge of road maintenance.

In a different yet related issue, the persons who are guides for the canopy tour, must receive the proper training and certification by the company named (Adventure Playground) who provides a manual to train and keep updates the guides. Company also has the necessary insurance coverages for the tourists.

The company has also created a code of ethics which explains the values and principals of the company, these are transmitted to the employees and clients, and someone has been made charge of for following up on this.

POLICY ON COMMUNICATION WITH CLIENTS

Trogón Lodge is committed to provide to their staff and clients the cultural characteristics of the San Gerardo de Dota area with the variety of gastronomy offered in the area, local products and even the internal decoration of the rooms and restaurant.

We are in constant search for cultural and environmental activities taking place in the area to promote, support, rescue and maintain the Costa Rican identity, and thus providing the tourist with the opportunity to experience beyond the natural treasures of the area, providing also a contact with the human part of the region.

In a related topic, all clients visiting Trogón Lodge will be informed thru their confirmation or material received, some tips, recommendations, rules that will be visible in specified areas of the expected behavior ,when visiting protected areas, so the impact generated is minimal.

A manual of regulations and rules that must be applied is provided by the company. Some of the regulations mentioned are, code of conduct to protect children and adolescents against commercial sexual exploitation in tourism trips among other aspects. The information on this manual is transmitted to the company employees and suppliers that have some kind of commercial relationship with the company. There is an established protocol, that require certain procedures in the event that a situation of sexual tourism with minors takes place.



The promotional material for the lodge must make visible the symbols or logos for the code of conduct program, with an emphasis on sustainability, and the goal is to be CST certified, so we may market / promote the lodge with all the requirements. A comprised document was drafted on all promotional material verifying that is true.

POLICY ON HOUSE KEEPING

The Company has established guidelines on the management of solid wastes, for this reason 3 marked (paper, aluminum, and plastic), garbage disposals have been put on the exterior of each room block consisting of two. The housekeepers are responsible for collecting and separation of materials.

As part of the program to save water and energy, certain etiquettes have been established to motivate the guests at the lodge with these green programs.

All of the lightbulbs at the lodge have been changed from incandescent to florescent, to help contribute with the energy saving process.

Most of the toilets in the hotel rooms have been changed, for new ones that consume less water on each flush. The goal is to eventually change all of the toilets in guest rooms and in public areas.

POLICY RESPONSE MEASUREMENT

It is to be said in this policy, once the certification for Tourism Sustainability is obtained, a survey must be designed which measures by the way of the clients opinion about the programs implemented by the CST (Certification for Sustainability in Tourism).

A person must be made responsible to follow up on the surveys, and to send them off for that process to the ICT (Institute of Costa-Rican Tourism), and should it be required, take the necessary measures to make the process better and faster, in order to create better quality of service for the client.

Trogón lodge is listed in the Costa Rican Hotel directory and in the National Tourism members & affiliates in order to obtain recommendations on how to have a better quality of service on a daily basis.

HUMAN CAPITAL MANAGEMENT POLICY

With the creation of this policy, the following fundamental points have been established for the internal work regulations.

- A committee must be formed to take charge of complementing and suggesting ideas for the internal work regulations.
- The policy on hiring new employees is transmitted thru the employees, so they too are clear that by hiring local people in all positions at the lodge is possible.



- In certain meetings that will take place, it is ok for the local community to take part in these hearings, as they can become part of the future human capital of the lodge.
- There is a policy on receiving students from any profession related to tourism, however we hardly receive any students because there are no high schools or universities nearby.
- A policy exists, that states when hiring new employees, the wages or social guarantees cannot be below those established by law.
- A survey must be done to the residents living near the lodge, to ask what the impact, if any, has been like, this should be done every 6 months.
- A system has been created, where if the local residents need to present a complaint or recommendations to the lodge this is possible.
- The hotel employees of the lodge are aware that there is a system and authorities that they can contact in case they witness any sexual conduct or exploitation towards young children or adolescents in tourism, giving the witness confidence of protection by laws.
- Human rights, equal opportunities and social guarantees are respected and protected by the internal labor regulations and different policies that the employees and the employer have developed.
- There is a policy on the prohibition of child labor which has been released to employees with the purpose to sensitize the staff on the issue.

POLICY ON INDIRECT ECONOMICAL BENEFITS

The Company is aware of the importance to consume local and national products, and thus the local artisans and micro-companies have the opportunity to sell their products. Cultural goods produced by local ethnic groups like masks and hand bags can be offered to tourists. There is a law against the commercialization of indigenous or archeological artifacts, made with species on the endangered list. Other activities offered by local companies are used, like purchase of local honey, fruits, vegetables and horseback riding tours.

The local school also participate in topics like sustainability and healthier living for the kids, to provide them with a good education.

Surveys must be taken with the local community to see what necessities are present, and to collaborate with the development of the area.

POLICY ON HEALTH

A health fair should take place at least once a year, where basic health care is provided to the employees and local community in general.

In the San Gerardo de Dota community, there are no health services available, the lodge employees

must go to the nearby town to receive medical attention.

We are always willing to participate in local health programs that take place in the local community.

POLICY ON SOCIAL AND CULTURAL DEVELOPMENT

Grupo Mawamba promotes and supports recreational, beneficial, social and cultural activities, which are done by planning, and a good organization, whether locally or at an international level, we are always in search of rescuing the Costa Rican traditions and customs.

We are working together with the local road association with the objective to make the access to San Gerardo de Dota a better one, and we also contribute economically or with use of our facilities to the local school and Catholic Church for any events they may need help with to develop alliances with the community.

We are committed to establish, serve and promote artistic activities which emphasize on the idea to promote sport, culture, and the expression of the artists of the region, in order to create recreational spaces.

In addition, reduced tariffs are provided for nationals, and incentives for employees, providing them with special packages for families or even courtesy nights to stay over.

We also support Micro companies offering fresh and local produce converting this into a solid business relationship to boost the area's economy. Among these products offered, we look for those that are more representative of the national identity.

An analysis of the socio-cultural impact generated by tourism activity was done in the area of operation, we seek to minimize such effects through corrective actions such as training the staff in issues of cultural preservation.



MAWAMBA LODGE
TORTUGUERO, LIMÓN

CAFÉ KAHAWA
SAN GERARDO DE DOTA

KIWANDA MAJI
RINCÓN DE LA VIEJA

RÍO DANTA REST.
GUÁPILES