

REPUBLIC OF COTE D'IVOIRE



MINISTRY OF DIGITAL TRANSITION AND DIGITALIZATION

**Results Acceleration Project For Inclusive Digitalization In  
Côte d'Ivoire (P180059)**

**As Phase 1 of the Results Acceleration Project For Inclusive  
Digitalization In Côte d'Ivoire Using the Multiphase Programmatic  
Approach**

**ENVIRONMENTAL AND SOCIAL  
COMMITMENT PLAN (ESCP)**

**Appraisal**

May 23, 2025

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Côte d'Ivoire (the Recipient) will implement the Results Acceleration Project For Inclusive Digitalization In Côte d'Ivoire (the Project), with the involvement of the Ministry of Digital Transition and Digitalization (MTND), as set out in the Financing Agreement (the Agreement). The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the referred Agreements.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred Agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative specified in the Agreements. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>a. The Recipient shall establish and maintain the Project Coordination Unit (PCU) with qualified staff and resources to support management of environmental, social, health and safety (ESHS) risks and impacts of the Project including: i) one environmental specialist to supervise the project E&amp;S risks management and ensure the implementation of the E&amp;S documents prepared under the Project ; ii) one social specialist (with expertise in gender and SEA/SH aspects), and any other E&amp;S positions that may be deemed necessary during Project implementation.</p> <p>b. Enter into cooperation arrangements with the Ministry of Defence/ (<i>Commandement Supérieur de la Gendarmerie Nationale</i>) to assign a Security Focal Point to the PCU, to conduct of all security monitoring/management aspects of the Project.</p>	<p>a. Establish a PCU as set out in the Financing Agreement, including hiring or appointing: (i) one environmental specialist; and (ii) one social specialist. The PCU shall be established, and the above specialists hired/appointed, prior to the Signature Date. Thereafter maintain the PCU and these positions throughout Project implementation.</p> <p>b. Enter into cooperation arrangements no later than three (3) months after the Effective Date</p>	PCU

B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>Prepare and implement the following capacity building measures:</p> <p><b>1. The training on environmental and social standards will focus, inter alia, on:</b></p> <ul style="list-style-type: none"> <li>-ESS 1: Assessment and management of environmental and social risks and impacts, including the risks and impacts related to dismantling of masts and radio stations</li> <li>- ESS 2: Labor and working conditions and Labor Management Procedures (LMP)</li> <li>- ESS 3: Resource efficiency and Pollution Prevention and Management</li> <li>-ESS 4: Community health and safety and security management plan (SMP)</li> <li>-ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</li> <li>-ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</li> <li>-ESS 8: Cultural heritage</li> <li>-ESS 10: Stakeholder engagement and information disclosure and the Stakeholder Engagement Plan (SEP)</li> </ul> <p>The training shall target the following stakeholders:</p> <ul style="list-style-type: none"> <li>-Project Steering Committee</li> <li>-PCU (social specialist, environmental specialist, procurement specialist)</li> <li>- NGOs working in the environmental and social fields in the Project areas</li> <li>- Relevant technical entities</li> <li>- National Environment Agency (ANDE)</li> <li>- Relevant local authorities</li> </ul> <p><b>2.Occupational health and safety training:</b></p> <p>Require contractors and supervising entities to train all workers involved in the Project activities, on occupational health and safety, first aid equipment, prevention of emergencies and how to prepare for and react to such situations.</p> <p>Require Contractors to also ensure that the workers of their subcontractors are trained on the same subjects. The training shall target the following stakeholders:</p> <ul style="list-style-type: none"> <li>-Contractors</li> <li>- Contractor’s workers (including any subcontractors)</li> <li>-Community workers</li> <li>- Supervising entities</li> </ul>	<p>Three (3) months after Effective Date and once every six (6) months throughout Project implementation.</p> <p>Prior to the start of employment of newly recruited workers and for those already working, training shall be provided quarterly to ensure that all staff are trained regularly.</p> <p>Throughout the Project implementation</p>	<p>PCU with the support of other consultants/Training Center hired by the Project if necessary.</p> <p>PCU</p>
---	---	---	--

<p>- PCU</p> <p>- NGO</p> <p><b>Information, Education and Communication (IEC)</b></p> <p>Raise awareness among contractors' workers, including subcontractors' workers, and supervising entity mobilized on the sites to the environmental and social standards as well as on respect for Code of conduct and security measures.</p> <p><b>3. Training on labor and working conditions</b></p> <ul style="list-style-type: none"><li>-Conditions of employment under national labor law</li><li>- Code of conduct for suppliers / service providers and subcontractors;</li><li>- workers' organizations;</li><li>- Rules on child labor and minimum working age;</li><li>- Workers' rights;</li><li>-Worker complaints and SEA / SH complaints</li></ul> <p>Discrimination and harassment (SEA / SH) / incidence at work.</p> <p>The training shall target the following stakeholders:</p> <ul style="list-style-type: none"><li>- Contractor's workers (including any subcontractors)</li><li>- Supervising Engineers/Consulting ;</li><li>-NGOs working in the social field in the Project area.</li></ul> <p><b>4. Training on environmental and social management</b></p> <p>This training shall provide knowledge about :</p> <ul style="list-style-type: none"><li>- the process of selection and environmental and social classification of sub-projects ;</li><li>- the procedures for organizing and carrying out the ESIA and the RP;</li><li>- environmental policies, procedures and legislation in Cote d'Ivoire;</li><li>- Implementation monitoring process of the ESMP and the RP</li></ul> <p>The training shall target the following stakeholders:</p> <ul style="list-style-type: none"><li>- PCU (social specialist, environmental specialist, safety specialist, E&amp;S assistants, procurement specialist)</li><li>- Central and local technical structures involved in the Project</li><li>- National Environment Agency (ANDE)</li></ul> <p><b>5. Training on grievance mechanism</b></p> <p>The training shall focus on the following modules:</p>	<p>Prior to the start of employment of newly recruited workers and for those already working, training shall be provided quarterly to ensure that all staff are trained regularly.</p> <p>Prior to the start of employment of newly recruited workers and for those already working, training shall be provided annually to ensure that all staff are trained regularly.</p> <p>Prior to the start of employment of newly recruited workers and for those already working, training shall</p>	<p>PCU</p> <p>PCU</p> <p>PCU</p>
--	---	----------------------------------



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<b>8. Information / awareness on potential environmental and social risks targeting local populations / communities:</b> Information / awareness on potential environmental and social risks, including the Project SEA / SH, to elicit their commitment and participation in the identification of measures aimed at minimizing and mitigating negative environmental and social risks and impacts related to Project implementation.		
MONITORING AND REPORTING			
C	<b>REGULAR REPORTING</b>  Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include, but not limited to: <ul style="list-style-type: none"> <li>• Status of preparation and implementation of E&amp;S documents required under the ESCP.</li> <li>• Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan.</li> <li>• Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them.</li> <li>• E&amp;S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports.</li> <li>• Number and status of resolution of incidents and accidents reported under action E below.</li> <li>• Number and level of ownership of capacity building measures carried out.</li> <li>• Etc.</li> </ul>	Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 15 days after the end of each quarter.	PCU
D	<b>CONTRACTORS' MONTHLY REPORTS</b>  Require contractors, supervising firms and service providers/suppliers to provide the PCU with monthly monitoring reports on E&S performance (environmental, social, health and safety aspects) in accordance with the metrics specified in the respective bidding documents and contracts. These monthly reports shall be submitted to the Association by the Recipient upon request, as needed.	Submit the monthly reports to the Association upon request and as annexes to the reports to be submitted under action C above, and throughout the Project implementation.	PCU
E	<b>INCIDENTS AND ACCIDENTS</b>  Notify the Association of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request.	Notify the Association no later than forty-eight (48) hours after learning of the incident or accident. Provide available details upon request.  Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.	PCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes.</p> <p>Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>This systematic reporting shall be maintained throughout Project implementation.</p>	
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>1. Prepare and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>2. Prepare and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for sub projects or activities that require a site-specific ESIA/ESMP, consistent with the relevant ESSs.</p> <p>3. Require the implementing agencies, contractors, subcontractors, and supervising engineers associated with the subprojects to prepare and implement the subproject site-specific Environmental and Social Impact Assessment (ESIA)/ Environmental and Social Management Plan (ESMP), as set out in the ESMF. The proposed subprojects' activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p> <p>4. Prepare and implement a Sectoral Strategic Environmental and Social Assessment (SESA) for the Digital Development Strategy (component 1), consistent with relevant ESSs.</p> <p>5. Prepare and implement Environmental and Social Audits (component 2), consistent with relevant ESSs.</p>	<p>1. Prepare the ESMF at Appraisal and thereafter implement the ESMF throughout Project implementation.</p> <p>2. Prepare the ESIA/ESMP prior to the launching of bidding documents and the start of any activity requiring the preparation of a such instrument and thereafter implement the ESIA/ESMP throughout Project implementation.</p> <p>3. Prepare the ESIA/ESMP and incorporate the ESMP as part of the respective bidding documents for the respective subproject prior to the carrying out of subproject that requires the preparation of such ESMP. Once finalized, implement the respective ESMP throughout Project implementation.</p> <p>4. Same timeframe as for the adoption of the Sectoral Digital Development Strategy and thereafter implement the SESA throughout Project implementation.</p> <p>5. Prepare the E&amp;S Audits prior to the launching of bidding documents and the start of work on any existing facility.</p>	PCU



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant ESIA/ESMP and security documents and / or plans, as well as, the Labor Management Procedures, and code of conduct, into the E&amp;S specifications of the procurement documents and contracts with contractors and supervising firms.</p> <p>Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&amp;S specifications of their respective contracts.</p> <p>Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association upon request.</p>	<p>As part of the preparation of procurement documents and before the signing of respective contracts and effective start of the relevant services or works.</p> <p>Supervise contractors and supervising Engineers, throughout Project implementation. Copies of relevant contracts provided to the Association upon request.</p>	PCU
1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project, including, inter alia, potential environmental and social assessment instruments to be supported under the TA in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	Throughout Project implementation	PCU
1.6	<p><b>USE OF [BORROWER/RECIPIENT'S] ENVIRONMENTAL AND SOCIAL FRAMEWORK</b></p> <p>The Recipient's E&amp;S Framework is partially being considered for this Project for ESS2 and ESS8:</p> <p>1. Ensure that the labor management and working conditions of Project workers are consistent with this ESCP and with the Borrower's labor framework, which includes, inter alia, the country's relevant policy, legal and institutional framework, including its national, departmental, or local implementing institutions, and the applicable laws, regulations, procedures, and implementation capacity. The labor management and working conditions of Project workers will also be consistent with ESS2 requirements for community workers, sub-contractors, main suppliers' workers and child and forced labor.</p> <p>2. Ensure that cultural heritage management measures are consistent with this ESCP and with Borrower's framework, including tangible and intangible cultural heritage protection and involves the Ivorian Office of Cultural Heritage (OIPC) in consultations, implementation of avoidance and mitigation measures as well as chance find procedure.</p>	<p>1. Throughout project implementation</p> <p>2. Throughout project implementation</p>	PCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<b>LABOR MANAGEMENT PROCEDURES</b>  1. Use the borrower frameworks for materially consistent provisions and address the identified gaps under Labor Management Procedures (LMP).  2. Prepare, and implement the LMP for the Project, including, inter alia, provisions governing forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms. The LMP will spell out provisions for supervision of working implementation.	1. Throughout the Project implementation  2. Prepare the LMP no later than two (02) months after Project Effective Date and thereafter implement the LMP throughout Project implementation.	PCU
2.2	<b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b>  Require contractors and subcontractors to prepare and implement OHS Management Measures or Plans as specified in the ESIA / ESMP in accordance with ESS 2.	Prepare the OHS Management Measures or Plan prior to the start of the work and thereafter implement the measures or plan throughout Project implementation.	PCU
2.3	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b>  Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with national requirements and ESS2.	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	PCU
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>WASTE MANAGEMENT PLAN</b>  Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous waste, consistent with ESS3.  Ensure that the contractors develop, adopt, and implement a WMP (common and specific waste) in accordance with the provision of the ESMF and site specific ESIA/ESMP, in a manner acceptable to the Association.  Prepare and implement an Electrical and Electronic Equipment Waste Management Plan (EEEWMP), to manage hazardous and non-hazardous electrical and electronic wastes consistent with ESS3.	Prepare the WMP prior to the actual start of construction works and thereafter implement the WMP throughout Project implementation.  The same timeframe as for the adoption and implementation of the ESMP.  Prepare the EEEWMP no later than three (3) months after the Effective Date and thereafter implement the EEEWMP throughout Project implementation.	PCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Incorporate resource (raw materials, energy, and water) efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above and implement those measures for the sub-projects/ activities, to manage efficient consumption of these resources in accordance with ESS3.</p> <p>Ensure that the prevention and management measures for risks and potential impacts provided for the in EEEWMP are implemented in accordance with ESS3.</p>	<p>Same timeframe as for the preparation and implementation of the ESMP.</p> <p>These measures and actions shall be maintained and implemented throughout Project implementation.</p>	PCU
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above.</p> <p>Ensure that contractors / supervising entities develop, adopt, and implement measures and actions to assess and manage the risks related to traffic and road safety (including, among others, road traffic and safety plan, in particular a plan for the movement of construction equipment/ decommissioning and dismantling of abandoned telecommunications sites and detour routes), in accordance with ESS 4 requirements.</p>	<p>Same timeframe as for the preparation and implementation of the ESMP.</p> <p>Prior to the start of construction works/ decommissioning and dismantling of abandoned telecommunications sites, and throughout the Project implementation.</p>	PCU
4.2	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia risks related to labor influx, SEA/SH risks and violence against children, behavior of Project workers in relation to respect for community habits and customs, security risks and those related to the spread of HIV/AIDS, community health and safety issues (accidents, electrocution and exposure to non-ionizing radiation, falling pylons, etc.), response to emergency situations, and include mitigation measures in the ESMP to be prepared in accordance with the ESMF.</p>	<p>Same timeframe as for the preparation and implementation of the ESMP.</p>	PCU
4.3	<p><b>SEA AND SH RISKS</b></p> <p>Prepare and implement a SEA/SH Action Plan, to assess and manage the risks of SEA and SH.</p>	<p>Prepare the SEA/SH Action plan 3 months after the Project Effective Date and thereafter implement it throughout Project implementation.</p>	PCU
4.4	<p><b>SECURITY MANAGEMENT</b></p>	<p>1. Update and adopt the SMP prior to engaging security personnel and thereafter implement throughout Project implementation.</p>	PCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>1. Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard Project workers, sites, assets, and activities, as set out in the Security Management Plan (SMP), consistent with the requirements of ESS4 and guided by the principles of proportionality and Good International Industry Practice (GIIP), and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel. The project shall update and use the Security Management Plan (SMP) of the Cote d'Ivoire Gulf of Guinea Northern Regions Social Cohesion project (P175043) that covers the same northern regions.</p> <p>2. Assign a Security Focal Point to conduct security monitoring/management and ensure liaison with the relevant authorities in the Project areas in the North of Côte d'Ivoire.</p>	<p>2. Assign the Security focal point prior to engaging security personnel and maintain the position throughout the project implementation.</p>	
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT FRAMEWORK PLAN or PLANS</b></p> <p>1. Prepare and implement a Resettlement Framework (RF) for the Project, consistent with ESS5.</p> <p>2. Prepare and implement a Resettlement Plan (RP) or a Livelihood Restoration Plan (LRP) for each activity under the Project for which such RP or LRP is required, as set out in the RPF and consistent with ESS5.</p> <p>3. Ensure that the Grievance Mechanism (GM) related to the resettlement is reflected in the Project RF, site-specific RP and SEP is equipped to receive, register and facilitate the resolution of SEA/SH complaints. This GM shall be operational and accessible to all those involved in land acquisition and resettlement activities.</p>	<p>1. Prepare the RF two (02) months after the Project Effective Date and thereafter implement the RF throughout Project implementation.</p> <p>2. Prepare and implement the respective RP or LRP prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation has been provided, and as applicable displaced people have been resettled and moving allowances have been provided.</p> <p>3. Establish the grievance mechanism prior to the start of RP implementation and thereafter maintain and operate it throughout Project implementation.</p>	PCU
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS</b></p> <p>Adopt and implement biodiversity management measures, as part of the ESMF and site-specific ESIA/ESMP, in accordance with the guidelines of the ESMF prepared for the Project, and consistent with ESS6.</p>	<p>Same timeframe as for the adoption and implementation of the ESMF and ESIA/ESMP, thereafter implementation of these measures throughout Project implementation.</p>	PCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Where a site-specific ESIA / ESMP identifies significant risks and adverse impacts on biodiversity, prepare and implement a Biodiversity Management Plan (BMP), in accordance with the guidelines of the ESIA/ESMP prepared for the Project activity, and consistent with ESS6. Specific E&S documents shall be submitted to the Association for approval before launching procurement processes and entering into contracts with contractors and supervising entities.	Prepare the BMP prior to the start of the large and small-scale construction works and thereafter implement the BMP throughout Project implementation.	
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<b>INDIGENOUS PEOPLES FRAMEWORK PLAN or PLANS</b> Not relevant to the Project		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CULTURAL HERITAGE RISKS AND IMPACTS</b>  Use of borrower framework for materially consistent provisions and address the identified gaps by adopting and implementing cultural heritage management measures, as part of the ESMF and site-specific ESIA/ESMP.	Same timeframe as for the preparation and implementation of Project ESMF, and site specific ESIA/ESMP, and thereafter implement these measures throughout Project implementation.	PCU
8.2	<b>CHANCE FINDS</b> Describe and implement the chance finds procedures as part of the ESMF, and site specific ESIA/ESMP of the Project consistent with ESS8.	Same timeline as for the adoption and implementation of the ESMF and the site-specific ESIA/ESMP, thereafter implement the procedures throughout Project implementation.	PCU
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	<b>ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)</b> Not relevant to the Project		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN</b>  Prepare and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	Prepare the SEP by Project Appraisal and thereafter implement the SEP throughout Project implementation. The SEP was reviewed and disclosed on May 23, 2025.	PCU
10.2	<b>PROJECT GRIEVANCE MECHANISM</b>  Establish, publicize, maintain, and operate an accessible grievance mechanism (GM), to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.	Establish the grievance mechanism two (2) months after the Project Effective Date and thereafter maintain and operate the grievance mechanism throughout Project implementation.	PCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p> <p>The GM dissemination shall be embedded in a communication plan as part of the SEP to ensure that the local populations affected by the Project are aware of the existence of this mechanism and know the procedures for filing and handling complaints and other remedies.</p>	During operationalization of the GM and thereafter maintain the GM dissemination throughout Project implementation.	
INDICATORS FOR IMPLEMENTATION READINESS			
<p>The following actions are indicators for implementation readiness:</p> <p>A.</p> <p>C.</p> <p>E.</p> <p>1.1</p> <p>2.1</p> <p>2.2</p> <p>2.3</p> <p>3.1</p> <p>3.2</p> <p>4.2</p> <p>4.3</p> <p>4.4</p> <p>5.1</p> <p>8.2</p> <p>10.1</p> <p>10.2</p>			