

**Republic of Mozambique /  
Ministry of Public Works, Housing and Water  
Resources (MOPHRH)  
Housing Development Fund (FFH, FP),**

**Additional Financing for the Mozambique  
Northern Urban Development Project (PDUNM)  
(P175266)**

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

**AF Negotiated Version**

**May 29, 2025**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Mozambique (the Recipient) is implementing the Mozambique Northern Urban Development Project (the Project), with the involvement of the Ministry of Public Works, Housing and Water Resources (MOPHRH) and Housing Development Fund (FFH, FP), as set out in the Original and Additional Financing Agreement (the Agreements). The International Development Association (the Association) has agreed to provide the original financing and additional financing for the Project, as set out in Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project referred to above.
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 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) Maintain the Project Management Unit (PMU) with qualified staff and resources to support management of environmental, social, health and safety (ESHS) risks and impacts related to the implementation of the Project including the following E&amp;S positions:</p> <p><u>Central Level</u></p> <ul style="list-style-type: none"> <li>i. One (1) full-time Senior Social Specialist;</li> <li>ii. One (1) full-time Senior Security Specialist;</li> <li>iii. One (1) full-time E&amp;S Focal Point (FP) from FFH.</li> </ul> <p>b) Hire the following E&amp;S positions:</p> <p><u>Central Level</u></p> <ul style="list-style-type: none"> <li>i. One (1) full-time Senior Environmental, Health and Safety (EHS) Specialist;</li> <li>ii. One (1) full-time Senior Gender-Based Violence (GBV) / Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH) Specialist;</li> </ul> <p><u>Provincial Level</u></p> <ul style="list-style-type: none"> <li>iii. Two (2) Environmental Specialists (one based in Pemba also covering Montepuez, and another based in Nampula also covering Nacala-Porto);</li> <li>iv. Two (2) Social and GBV/SEA/SH Specialists (one based in Pemba also covering Montepuez, and another based in Nampula also covering Nacala-Porto);</li> <li>v. Two (2) Security Officers (one based in Pemba also covering Montepuez, and another based in Nampula also covering Nacala-Porto);</li> <li>vi. Two (2) Community Liaison Officers (one based in Pemba also covering Montepuez, and another based in Nampula also covering Nacala-Porto).</li> </ul> <p>c) Maintain a Third-Party Monitoring Agency (TPMA) to monitor the implementation of ESF Instruments.</p> <p>d) Cause the provincial and municipal authorities supporting the implementation of the project to appoint an E&amp;S FP.</p> <p>The resources mentioned in a) to d) must have experience and qualifications in accordance with terms of reference satisfactorily to the World Bank and be hired or appointed based on those terms of reference.</p>	<p>a) Maintain the hired or appointed E&amp;S positions within the PMU throughout Project implementation.</p> <p>b) Hire or appoint the E&amp;S positions listed below within the timeline indicated below and thereafter maintain them throughout Project implementation:</p> <p><u>Central Level</u></p> <ul style="list-style-type: none"> <li>i. One full-time Senior EHS Specialist - No later than one (1) month after the Additional Financing (AF) Effective Date;</li> <li>ii. One full-time Senior GBV/SEA/SH Specialist - No later than two (2) months after the Additional Financing (AF) Effective Date;</li> </ul> <p><u>Provincial Level</u></p> <ul style="list-style-type: none"> <li>iii. Two Environmental Specialists - No later than two (2) months after the AF Effective Date;</li> <li>iv. Two Social and GBV/SEA/SH Specialists - No later than two (2) months after the AF Effective Date;</li> <li>v. Two Security Officers - No later than two (2) months after the AF Effective Date;</li> <li>vi. Two Community Liaison Officers - No later than two</li> </ul>	FFH

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		<p>(2) months after the AF Effective Date.</p> <p>c) Maintain a TPMA throughout Project implementation.</p> <p>d) Before the commencement of any activities they support and thereafter maintain them throughout implementation of those activities.</p>	
B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>a) Prepare and implement a capacity-building plan for the PIU staff and project workers covering the following topics:</p> <ul style="list-style-type: none"> <li>• Assessment (including E&amp;S screening) and management of Environmental, Social, Health and Safety (ESHS) risks and impacts;</li> <li>• Labor and working conditions, including occupational health and safety;</li> <li>• Community health and safety;</li> <li>• Transportation safety;</li> <li>• Emergency preparedness and response;</li> <li>• Security management;</li> <li>• Resource efficiency and pollution prevention and management;</li> <li>• Biodiversity conservation;</li> <li>• Involuntary resettlement;</li> <li>• Stakeholder mapping and engagement;</li> <li>• Design and implementation of Grievance Mechanism;</li> <li>• Community governance;</li> <li>• Conflict management;</li> <li>• Contractors/Subcontractors/Supervising Firms ESHS performance management;</li> <li>• Management of GBV/SEA/SH risks;</li> <li>• Codes of Conduct with SEA/SH provisions;</li> <li>• ESHS monitoring and reporting.</li> </ul> <p>b) Prepare and implement an awareness-raising plan for the affected communities covering the following topics:</p> <ul style="list-style-type: none"> <li>• Communicable diseases (HIV-AIDS/STD);</li> <li>• Awareness and prevention of SEA/SH;</li> <li>• Road safety;</li> </ul>	<p>a) Prepare and implement the capacity-building plan prior to initiating project activities involving the PIU staff and project workers and thereafter deliver regular refresher training throughout the project implementation.</p> <p>b) Prepare and implement the capacity-building plan prior to initiating activities in each affected community and thereafter conduct refresher awareness-raising actions throughout the project implementation.</p>	FFH

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> <li>Emergency preparedness and response;</li> <li>Codes of conduct for project workers;</li> <li>Community engagement;</li> <li>Grievance Mechanism;</li> <li>Security issues and their management;</li> <li>Project-related employment opportunities.</li> </ul>		
MONITORING AND REPORTING			
C	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the ESHS performance of the Project. The reports shall include:</p> <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 (SEP).</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> </ul>	<p>Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 20 business days after the end of each reporting period.</p>	FFH
D	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	<p>Submit the monthly reports of the contractors as part of the quarterly reports indicated in Section C of this report to the Association throughout the duration of the Contractors' and supervising firms' contracts.</p>	FFH
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>a) 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; forced or child labor; displacement without due process (forced eviction); allegations of SEA or SH; or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p>	<p>a) Notify the Association no later than 24 hours after learning of a fatality or a SEA/SH incident and no later than 48 hours for other incidents.</p>	FFH

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	b) Arrange for an appropriate investigation of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, 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.	b) Provide investigation 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 Bank.	
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b> <ol style="list-style-type: none"> <li>Update and implement an Environmental and Social Management Framework (ESMF) for the Project, including Labor Management Procedures (LMP), a GBV/SEA/SH Risk Assessment and Response Action Plan, an Emergency Response Plan (ERP), Chance Finds Procedures (CFP), and a E&amp;S Capacity Building Plan, consistent with the relevant ESSs. The proposed activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</li> <li>Prepare, disclose, and implement site-specific Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plan (ESMPs) for activities with substantial ESHS risks and impacts, consistent with the ESMF and the relevant ESSs.</li> <li>Prepare, disclose, and implement ESMPs for activities with moderate ESHS risks and impacts consistent with the ESMF and relevant ESSs.</li> <li>Cause the contractors to develop and implement Construction ESMPs (C-ESMPs), consistent with the relevant ESSs, for the physical interventions planned under the Project. The C-ESMPs shall include SEA/SH risk mitigation and response measures in line with those included in the GBV/SEA/SH Risk Assessment and Response Action Plan prepared for the project.</li> </ol>	<ol style="list-style-type: none"> <li>An ESMF, including LMP, GBV/SEA/SH Action Plan, ERP, CFP and E&amp;S Capacity Building Plan, was prepared and disclosed on November 9, 2021, and will be updated and redisclosed no later than three (3) months after the AF Agreement Effective Date and thereafter implemented throughout Project implementation.</li> <li>Prepare and disclose the site-specific ESIAs and ESMPs prior to the launching of the procurement of the works and thereafter implement the site-specific ESIAs and ESMPs throughout Project implementation.</li> <li>Prepare and disclose the ESMPs prior to the launching of the procurement of the works and thereafter implement the ESMPs throughout Project implementation.</li> </ol>	FFH

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		4. Develop the C-ESMPs before the commencement of any works and thereafter implement them throughout Project implementation.	
1.2	<b>MANAGEMENT OF CONTRACTORS</b> Incorporate the relevant aspects of the ESCP, including, inter alia, ESMPs, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the ESHS specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.	As part of the preparation of procurement documents and respective contracts.  Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request.	FFH
1.3	<b>TECHNICAL ASSISTANCE</b> Carry out the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project 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.	Throughout Project implementation.	FFH
1.4	<b>CONTINGENT EMERGENCY RESPONSE FINANCING</b> 1. Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements, including a Positive List of activities and the Environmental and Social Screening Form and Checklist for the implementation of Component 5 - Contingent Emergency Response, in accordance with the ESMF and ESSs.  2. Implement the E&S provisions of the CERC Manual.	1. The adoption of the CERC Manual is a withdrawal condition under Section F of Schedule 2 to the Financing Agreement.  2. In accordance with the timeframes specified in the CERC Manual.	FFH
1.5	<b>USE OF RECIPIENT'S ENVIRONMENTAL AND SOCIAL FRAMEWORK</b> 1. The Project will partially use the Recipient's E&S frameworks regarding the assessment and management of risks and impacts, as well as labor and working conditions.	1. Throughout Project implementation.	FFH

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ol style="list-style-type: none"> <li>2. Ensure that the assessment and management of the E&amp;S risks and impacts of the Project are consistent with this ESCP, the ESSs and the Recipient's applicable E&amp;S framework.</li> <li>3. Promptly notify the Association of any changes to the Recipient's E&amp;S Framework that may materially adversely affect the Recipient's ability to manage the E&amp;S risks and impacts of the Project in line with the ESSs and the immediate measures taken or that are planned to be taken to address said changes and the ensuing potential risks and impacts of the Project. If, in the opinion of the Association, such changes adversely affect relevant ESHS risk management aspects of the Project, the Borrower shall agree to implement measures and actions to address them in a manner acceptable to the Association. The ESCP shall be updated to reflect such agreed actions.</li> </ol>	<ol style="list-style-type: none"> <li>2. Throughout Project implementation.</li> <li>3. Notify the Association immediately after taking notice of the change to the Recipient's E&amp;S framework. Subsequent actions, if requested by the Association, shall be reflected in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP.</li> </ol>	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<b>LABOR MANAGEMENT PROCEDURES</b> <ol style="list-style-type: none"> <li>1. Update and implement the Labor Management Procedures for the Project as part of the ESMF.</li> <li>2. Incorporate labor management procedures as part of the ESMPs to be prepared under actions 1.1(2) and (3) above.</li> <li>3. Cause contractors and subcontractors to adopt and implement those labor management procedures as part of the C-ESMPs to be prepared under action 1.1(4) above.</li> </ol>	<ol style="list-style-type: none"> <li>1. Labor Management Procedures were prepared and disclosed on November 9, 2021, as part of the ESMF, and will be updated and redisclosed no later than three (3) months after the AF Agreement Effective Date and thereafter implemented throughout Project implementation.</li> <li>2. Same timeframe as under actions 1.1(2) and (3) above.</li> <li>3. Same timeframe as under action 1.1(4) above.</li> </ol>	FFH
2.2	<b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b> <ol style="list-style-type: none"> <li>1. Prepare and include in the ESMPs to be prepared under actions 1.1(2) and (3) above measures to assess and manage the occupational health and safety (OHS) risks and impacts of the civil works planned under the Project, consistent with national regulations, Good International Industry Practices (GIIP) and the World Bank Group General Guidelines on Environmental, Health and Safety Guidelines (EHS).</li> </ol>	<ol style="list-style-type: none"> <li>1. Same timeframe as under actions 1.1(2) and (3) above.</li> <li>2. Same timeframe as under action 1.1(4) above.</li> </ol>	FFH



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. Cause contractors and subcontractors to prepare and implement an OHS Management Plan in accordance with the ESMPs to be prepared under actions 1.1(2) and (3) above as part of the C-ESMPs to be prepared under action 1.1(4) above.		
2.3	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> 1. Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2, including procedures to report SEA/SH incidents in an ethical and confidential manner, following a survivor centered approach. 2. Include the mechanism as a part of the procurement documents for the supervising firms and the contractors, with stipulations that they include similar provisions in agreements with their subcontractors before the start of project works. 3. Disseminate and explain the grievance mechanism to project workers, including contractors' workers.	1. A grievance mechanism for project workers was established and operationalized and thereafter maintained throughout Project implementation. 2. Before launching the procurement processes. 3. During the workers hiring or assigning and throughout Project implementation.	FFH
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>WASTE MANAGEMENT PLAN</b> 1. Incorporate waste management measures as part of the ESMPs to be prepared under actions 1.1(2) and (3) above, to manage hazardous and non-hazardous wastes, consistent with ESS3. 2. Cause contractors to adopt and implement a Waste Management Plan (WMP) in accordance with the ESMPs to be prepared under actions 1.1(2) and (3) above as part of the C-ESMPs to be prepared under action 1.1(4) above.	1. Same timeframe as under actions 1.1(2) and (3) above. 2. Same timeframe as under action 1.1(4) above.	FFH
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> 1. Incorporate resource efficiency and pollution prevention and management measures in the ESMPs to be prepared under actions 1.1(2) and (3) above. 2. Cause contractors and subcontractors to adopt and implement those measures as part of the C-ESMPs to be prepared under action 1.1(4) above.	1. Same timeframe as under actions 1.1(2) and (3) above. 2. Same timeframe as under action 1.1(4) above.	FFH
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>TRAFFIC AND ROAD SAFETY</b> 1. Incorporate measures to manage traffic and road safety risks in the ESMPs to be prepared under actions 1.1(2) and (3) above.	1. Same timeframe as under actions 1.1(2) and (3) above.	FFH

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. Cause contractors and subcontractors to adopt and implement those measures as part of the C-ESMPs to be prepared under action 1.1(4) above.	2. Same timeframe as under action 1.1(4) above.	
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> 1. Assess and manage specific risks and impacts to the community arising from project activities, including, inter alia, construction-induced traffic, community exposure to health issues, management and safety of hazardous materials, behavior of project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMPs to be prepared under actions 1.1(2) and (3) above.  2. Cause contractors and subcontractors to adopt and implement those measures as part of the C-ESMPs to be prepared under action 1.1(4) above.	1. Same timeframe as under actions 1.1(2) and (3) above.  2. Same timeframe as under action 1.1(4) above.	FFH
4.3	<b>SEA AND SH RISKS</b> Update and implement the GBV/SEA/SH Risk Assessment and Response Action Plan prepared for the Project as part of the ESMF, to assess and manage the risks of SEA and SH.	A GBV/SEA/SH Risk Assessment and Response Action Plan was prepared and disclosed on November 9, 2021, as part of the ESMF, and will be updated and redisclosed no later than three (3) months after the AF Effective Date and thereafter implemented throughout Project implementation.	FFH
4.4	<b>SECURITY MANAGEMENT</b> 1. Conduct a Security Risk Assessment (SRA) and subsequently prepare, adopt and implement a Security Management Framework (SMF) to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities.  2. Prepare and implement a Security Management Plan (SMP) for the project in line with the SMF.	1. An SRA and SMF were prepared by November 2021 and thereafter implemented throughout Project implementation.  2. A SMP was prepared in April 2025 and thereafter implemented throughout Project implementation.	FFH

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>RESETTLEMENT FRAMEWORK AND PLAN</b> <ol style="list-style-type: none"> <li>1. Prepare and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</li> <li>2. Prepare and implement a Resettlement Plans (RPs) or a Livelihood Restoration Plans (LRPs) as set out in the RPF, consistent with ESS5.</li> <li>3. Engage an independent third-party to conduct RP/LRP completion audits in accordance with ESS5 and in a manner acceptable to the Association.</li> </ol>	<ol style="list-style-type: none"> <li>1. An RFP was prepared and disclosed on November 18, 2021, and thereafter implemented throughout Project implementation.</li> <li>2. Prepare and implement the RPs or LRPs 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 displaced people have been resettled and moving allowances have been provided.</li> <li>3. At the end of each RP/LRP.</li> </ol>	FFH
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b> <ol style="list-style-type: none"> <li>1. Incorporate measures and actions to manage and monitor any risks and impacts on biodiversity as part of the ESMPs to be prepared under actions 1.1(2) and (3) above, consistent with the ESMF and ESS6.</li> <li>2. Cause contractors and subcontractors to adopt and implement those measures as part of the C-ESMPs to be prepared under action 1.1(4) above.</li> </ol>	<ol style="list-style-type: none"> <li>1. Same timeframe as under actions 1.1(2) and (3) above.</li> <li>2. Same timeframe as under action 1.1(4) above.</li> </ol>	FFH
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
NOT CURRENTLY RELEVANT			
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CHANCE FINDS</b> <ol style="list-style-type: none"> <li>1. Describe and implement chance finds procedures, along with other measures to protect the tangible and intangible cultural heritage, as part of the ESMPs to be prepared under actions 1.1(2) and (3) above, consistent with the ESMF and ESS8.</li> <li>2. Cause contractors and subcontractors to adopt and implement those chance finds procedures and measures as part of the C-ESMPs to be prepared under action 1.1(4) above.</li> </ol>	<ol style="list-style-type: none"> <li>1. Same timeframe as under actions 1.1(2) and (3) above.</li> <li>2. Same timeframe as under action 1.1(4) above.</li> </ol>	FFH

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
NOT CURRENTLY RELEVANT			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN</b> Update 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. The SEP will need to include a record of the stakeholder engagement activities carried out.	A SEP was prepared and disclosed on November 17, 2021, and was updated and redisclosed on May 24, 2025, and thereafter implemented throughout Project implementation.	FFH
10.2	<b>PROJECT GRIEVANCE MECHANISM</b> Establish, publicize, maintain, and operate an accessible grievance mechanism, 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.  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.	A grievance mechanism was established by November 17, 2021, and thereafter maintained and operated throughout Project implementation.	FFH
<b>INDICATORS FOR IMPLEMENTATION READINESS</b>			
The actions required to ensure the implementation readiness of the Parent Project have been implemented.  The following actions are indicators for implementation readiness of the Additional Financing: A; B; 1.1; 2.1; 4.3; 5.1			