

KINGDOM OF CAMBODIA

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Ministry of Mines and Energy (MME)
Electricite du Cambodge (EDC)



**Cambodia Sustainable Energy Transition Project
(P510217)**

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

(Draft Version)

07 January, 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Kingdom of Cambodia (hereinafter **the Recipient**) will implement Cambodia Sustainable Energy Transition Project (P508278) ("**the Project**"), with the involvement of the Ministry of Mines and Energy (hereafter "**MME**") and its Electricite du Cambodge (hereafter "**EDC**"), as set out in the Financing Agreement (the Agreement). The International Development Association (the Association), acting as the administrator of [name the trust fund], has agreed to provide the financing for the Project, as set out in the referred Agreement.
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 Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
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, 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 Agreement, 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** Representatives specified in the Agreement or Dr. Praing Chulasa, Managing Director of the EDC. **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>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain two Project Management Units (PMU)s: one PMU at EDC's HQ level and one PMU at MME's HQ level with qualified E&S staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project. EDC's PMU will hire one national environmental standards consultant and one national social standards consultant. MME 's PMU will hire one national environmental and social consultant. Moreover, the project implementing consulting firm hired by EDC will be organized with environmental and social standards consultants.</p>	<p>Establish PMUs including Environmental and Social Focal staff from SEPRO for EDC and Assigned Environmental and Social Focal staff for MME as set out in EDC and MME within 30 days of project effectiveness.</p> <p>Recruit one national environmental standards consultant and one national social standards consultant for EDC's PMU and one national environmental and social standards consultant for MME's PMU within 90 days after project effective and thereafter maintain the PMUs and these positions throughout Project implementation.</p>	EDC and MME

B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures for different stakeholders:</p> <ul style="list-style-type: none"> • Trainings for PMUs' staff, E&S focal staff from PMUs, SME Bank and FTB on <ul style="list-style-type: none"> - World Bank ESF and ESSs - Project's ESMS - Project's ESMF and its associated Frameworks (i.e. IPPF, RPF/RAP) and Procedures and Plans (i.e. SEP, LMP, CHSP) - Occupational Health and Safety - Incident Reporting - GRM including complaint recording, investigation and resolution in SEP - Community Health and Safety including GBV, SEA/SH and VAC and workers code of conduct included in CHSP - ESHS specifications and requirements in bidding documents/procurement Trainings are to be provided by environmental and social consultants of the PMUs • Orientations for contractors, the supervisors/site engineers/supervision consultants from responsible entities (e.g. construction contractors, REEs), and others on to be provided by the E&S focal staff of EDC and MME, on the requirements of ESMF on the E&S risks at the level of contractors and supervisors, including LMP, OHS, GBV, CHSP, SEP, and GRM for workers. • Awareness campaign for affected communities: Road safety, CHSP, GBV, SEP, and GRM. • Contractors and their subcontractors, with oversight of the supervision consultants and PMUs shall ensure all workers of contractors and their Subcontractors sign Codes of Conduct for the contractors' workers and trained on requirements of Codes of Conduct including OHS, GBV, SEP and GRM. • Other E&S trainings, as needed during implementation 	<p>Either before commencement of project activities or within 3 months of project effective dates and thereafter with refresher courses as needed.</p> <p>Before starting relevant site-specific civil works and throughout project implementation, as needed</p> <p>Throughout project implementation, as needed</p> <p>Before starting relevant civil works</p>	<p>EDC and MME</p> <p>EDC and MME, PMUs</p> <p>PMUs</p> <p>EDC and MME, PMUs</p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>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:</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents (e.g., ESIA, ESMP, ESMS, etc.) required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Summary of the land acquisition and resettlement activities as per Resettlement Policy Framework or Resettlement Action Plan • Summary of the implementation of activities as per the Indigenous Peoples Planning Framework, if applicable • Complaints submitted to the grievance mechanism(s), the grievance register, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through monthly contractors' and project implementation consultants (PIC)' reports. • Number and status of resolution of incidents and accidents reported under action E below. • Updates on institutional structure and staffing of the PMU and contractors mobilized. • Project implementation status, including component/sub-component progress and compliance with ESCP commitments. • Environmental and social compliance status of contractors, subcontractors, and project activities. • Occupational Health and Safety (OHS) training summary, including number of trainings and participants. • Labor working conditions, Health and safety summary. 	<p>Submitting bi-annual (every six-months) reports to the World Bank throughout Project implementation</p> <p>Submit each report no later than 15 days after the end of each reporting period.</p>	<p>EDC for Component 1 activities</p> <p>MME for Component 2 activities</p>
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and project implementation consultants to provide monthly monitoring reports on E&S 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 to the EDC and Association upon request as annexes to the reports to be submitted under action C above.</p>	<p>EDC for Component 1 activities</p> <p>MME for Component 2 activities if any contractor engages</p>
E	<p>INCIDENTS AND ACCIDENTS</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>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 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 as per the incident reporting template annexed to the ESMF.</p> <p>This includes Incidents occurring during construction or operation of transmission lines, substations, battery energy storage systems, or distribution network expansion and strengthening for EV infrastructure-activities under Component 1. This includes incidents related to credit line for industrial energy efficiency under Component 2, and the Capacity Building for Implementing Agencies under Component 3.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. 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>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>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.</p>	<p>EDC for incidents related to Component 1 activities</p> <p>MME for incidents related to Component 2 activities</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>Finalize, disclose, and implement the draft Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant Environmental and Social Standards (ESSs).</p> <p>Prepare, and implement Environmental and Social Impact Assessment (ESIA) based on the results of the environmental and social screening and the outcomes of the critical habitat assessment for sub component 1.1. Prepare, and implement Initial Environmental Impact Assessments (IEIAs) in align with national requirements.</p> <p>Prepare and implement site-specific Environmental and Social Management Plans (ESMPs) based on the environmental and social screening process defined in the ESMF. These ESIA and ESMPs shall apply to all physical investments under Component 1, including:</p>	<p>Finalize and disclose the ESMF prior to project effectiveness, and thereafter implement the ESMF throughout Project implementation.</p> <p>Prepare and disclose the ESIA, IEIAs, and the site specific ESMPs for Component 1 activities no later than 90 days prior to the start of construction activities, and implement them throughout Project implementation.</p>	<p>EDC and MME</p> <p>EDC for Component 1 activities</p>

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> • Construction of transmission lines and substations • Installation of Battery Energy Storage Systems (BESS) • Distribution network expansion and strengthening for EV infrastructure <p>Prepare and implement the Environmental and Social Management Systems (ESMSs) for the operation of policy bank and participating financial institution for the credit line for Energy Efficiency activity under Component 2. Screening will be conducted in line with the ESMS of each bank to determine the level of assessment required. Prepare and implement ESMPs, where applicable, for industrial energy efficiency sub-projects financed through credit lines.</p> <p>All subprojects/activities identified in the exclusion list in the ESMF shall be ineligible for financing under the Project.</p>	<p>Prepare ESMPs, where applicable, prior to disbursement or initiation of activities, and implement throughout the relevant activity period.</p> <p>Prepare and implement the ESMS for the operation of SME Bank and FTB within 90 days of project effectiveness</p> <p>Maintain exclusion list screening throughout Project implementation.</p>	<p>MME for Component 2 activities</p> <p>SME Bank and FTB</p> <p>EDC and MME</p>
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, but not limited to ESMF, ESIA, site specific ESMP, SEP, the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and project implementation consultants/firms. Thereafter ensure that the contractors and project implementation consultants/firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and project implementation consultants/ firms to the Association. This applies to both Component 1 and 2 activities that require contractors, subcontractors to implement civil, physical works, or services with E&S obligations.</p>	<p>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.</p>	<p>EDC and MME</p>
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, technical assistance, and training support for EDC, MME, MISTI, SME, and FTB under the Project, including, inter alia, the E&S or plans 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>	<p>Throughout Project implementation.</p>	<p>EDC and MME in coordination with SME Bank and FTB</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.4	CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING Not applicable.		
1.5	ASSOCIATED FACILITIES Not applicable.		
1.6	USE OF [BORROWER/RECIPIENT'S] ENVIRONMENTAL AND SOCIAL FRAMEWORK The Borrower Framework will not be used under this project.		
1.7	COMMON APPROACH Not applicable.		
1.8	ACTIVITIES SUBJECT TO RETROACTIVE FINANCING Not applicable.		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Maintain, disclose, and implement the Labor Management Procedures (LMP) annexed to the ESMF outlining the provisions for fair and safe labor practices under the Project, including terms and conditions of employment, worker grievance mechanisms, occupational health and safety (OHS) measures, and contractor/subcontractor obligations. Ensure that the LMP is incorporated into all relevant contracts and implemented by all Project workers, including direct workers, contracted workers, and primary supply workers. Contractors shall be required to prepare and implement Contractor's Environmental and Social Management Plans (CESMPs), which will incorporate the labor provisions set out in the LMP, ensuring compliance with both national labor requirements and the World Bank's Environmental and Social Standards.	Prepare and disclose the LMP as part of the ESMF prior to project effectiveness. Implement the LMP throughout Project implementation. Integrate LMP requirements into procurement documents and contracts prior to contract signing. Prepare and implement the CESMPs by contractors prior to the commencement of civil works and maintain implementation throughout Project implementation.	EDC for Component 1, MME, SME Bank, and FTB for Component 2, and Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>Require contractors and subcontractors to prepare, adopt, and implement Occupational Health and Safety (OHS) Management Plans, in accordance with the Labor Management Procedures (LMP) and ESIA or the site-specific ESMPs, to assess and manage OHS risks and impacts of the Project.</p> <p>OHS plans shall include procedures for hazard identification, risk assessment, accident reporting, use of personal protective equipment (PPE), emergency response, and worker training. Assigned responsible persons shall monitor the implementation of OHS provisions at construction and installation sites. This applies to all civil works and physical implementation activities under Component 1 and Component 2.</p>	<p>Contractors and subcontractors shall prepare OHS Management Plans prior to commencement of relevant works. Implement and monitor OHS measures throughout Project implementation.</p> <p>Integrate OHS requirements into procurement documents and contracts prior to contract signing.</p>	EDC for Component 1, MME, SME Bank, and FTB for Component 2, and Contractors
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism (GRM) for all Project workers, as described in the Labor Management Procedures (LMP) and consistent with ESS2. The mechanism shall be accessible, confidential, and allow for anonymous complaints. It will include procedures for timely response and resolution of workplace concerns, including issues related to terms of employment, conditions of work, occupational health and safety (OHS), discrimination, harassment, and disciplinary practices.</p> <p>Ensure that all contractors, policy bank and participating financial institution establish similar grievance mechanisms for their workers and report regularly on complaints received and resolved.</p>	<p>Establish grievance mechanism for project workers prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p> <p>Contractors, and SME Bank/FTB to establish grievance mechanisms before site mobilization and before the project effectiveness, respectively.</p>	EDC and MME, PMUs Contractors, SME Bank, FTB
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare and implement a Waste Management Plan (WMP), as part of ESIA or the site specific ESMPs in accordance with ESS3, and the guidance provided in ESMF. The WMP shall address how to manage all hazardous and non-hazardous wastes generated from the sub project activities (e.g., batteries, old transformers with hazardous materials, construction waste, e-waste) during construction and operation phases.</p> <p>All waste management measures shall be integrated into procurement, supervision, and site monitoring protocols</p>	<p>Include WMP measures in ESIA or site-specific ESMPs prior to the commencement of works.</p> <p>Implement all waste management measures proposed under ESIA or site-specific ESMPs throughout Project implementation.</p>	EDC for Component 1, MME, SME Bank, and FTB for Component 2, and Contractors
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Incorporate resource efficiency and pollution prevention and management measures in the ESIA or site-specific ESMPs to be prepared under action 1.1 above. These measures shall be consistent with ESS3, the guidelines provided in the ESMF, and the guidance under the ESMS, and tailored to the nature and scale of each activity, particularly construction and energy efficiency equipment installation works under the Project.</p> <p>Contractors under the Project shall be required to monitor compliance as part of regular reporting.</p>	<p>Integrate into ESIA or site-specific ESMPs prior to commencement of relevant works. Implement and monitor throughout Project implementation.</p>	<p>EDC for Component 1, MME, SME Bank, and FTB for Component 2, and Contractors</p>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as well as river transport and waterway safety risks as required in the ESMF and community health and safety guideline annexed to the ESMF to be prepared under action 1.1 above. Measures shall include requirements for traffic routing, access control, public safety barriers, signage, speed management, coordination with local authorities, and community awareness to mitigate risks during material transport for construction works, or equipment delivery.</p> <p>Contractors under the Project shall prepare and implement Traffic/River Transport Management Plans as part of ESMP where needed.</p>	<p>Integrate into ESIA or site-specific ESMP prior to commencement of relevant works.</p> <p>Implement and monitor throughout Project implementation.</p>	<p>EDC for Component 1, MME for Component 2, and Contractors</p>
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from project activities, including but not limited to: behavior of project workers; risks of labor influx and interaction with communities; exposure to construction-related hazards; electrical safety; exposure risks to EMF from substations and high-voltage transmission lines; emergency response and fire safety. These risks shall be evaluated through ESIA and site-specific ESMPs.</p> <p>Mitigation measures shall be incorporated into the ESMPs, consistent with the ESMF. Community engagement, signage, access control, emergency preparedness, and awareness activities shall be implemented. Contractors and subcontractors are responsible for adhering to the measures during construction and operation phases.</p>	<p>Integrate into site-specific ESMP prior to commencement of relevant works. Implement and monitor throughout Project implementation.</p>	<p>EDC for Component 1, MME for Component 2, and Contractors</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.3	<p>SEA AND SH RISKS</p> <p>Implement SEA/SH prevention and response measures aligned with ESS4. Measures shall include: Codes of Conduct for all workers, Awareness training for workers and communities, Survivor-centered grievance redress procedures and Referral pathways for support services.</p> <p>A SEA/SH Action Plan shall be prepared if the risk is rated as moderate, substantial or higher for any subproject.</p>	Prepare SEA/SH Action Plan (if required) prior to commencement of civil works. Implement throughout Project implementation.	EDC , its PMU, and Contractors
4.4	<p>SECURITY MANAGEMENT</p> <p>Not applicable. The Project does not involve any security personnel employment.</p>		
4.5	<p>DAM SAFETY</p> <p>Not applicable. The Project does not involve dams or dam-related activities.</p>		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT POLICY FRAMEWORK</p> <p>Implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5. The RPF will guide the procedures, eligibility criteria, and implementation arrangements for land acquisition, restrictions on land use, and involuntary resettlement.</p> <p>Prepare and implement Resettlement Action Plans (RAPs) or Livelihood Restoration Plans (LRPs) shall be prepared and implemented in cases where land acquisition or economic displacement (e.g., temporary loss of land access, disruption to fishing, informal livelihoods) occurs. Ensure that compensation and assistance are provided prior to displacement, and that all resettlement is completed before commencement of civil works at each site, in line with ESS5.</p>	Prepare the RAP/LRP within 90 days of Project Effectiveness, and thereafter implement the RAP or LRP where relevant throughout Project implementation.	EDC and its PMU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Apply environmental and social screening to ensure no significant impacts on natural habitats or biodiversity. Use the exclusion criteria in the ESMF to avoid financing any activities within or near critical habitats, protected areas, or ecologically sensitive zones.</p> <p>If biodiversity-sensitive areas are identified near project sites, prepare and implement a Biodiversity Management Plan (BMP) as part of the ESIA or site-specific ESMP.</p> <p>For works near sensitive aquatic habitats along Mekong River, or key biodiversity areas, prepare species-specific protection measures for any adversely affected species (e.g., Birds, Mekong Dolphin, etc.) including but not limited to the construction timing restrictions, noise control, and exclusion zones. Reference this in biodiversity mitigation under ESS6.</p>	<p>Apply E&S screening using the ESMF and exclusion criteria prior to site selection or final project design. If needed, prepare BMP prior to commencement of any activity located near sensitive habitats. Implement biodiversity-related measures throughout Project implementation.</p>	EDC and its PMU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	<p>INDIGENOUS PEOPLES Planning FRAMEWORK</p> <p>Prepare and implement an IPPF for the Project, consistent with ESS7 to guide the identification and assessment of Indigenous Peoples' interests, risks, and impacts.</p> <p>Prepare and implement Indigenous Peoples Plans (IPPs) for subprojects that are located in areas where Indigenous Peoples are present or have collective attachment to land.</p>	<p>Prepare and disclose the IPPF prior to Project Effectiveness, and implement it throughout Project implementation.</p>	EDC and MME, PMUs
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>Screen all subprojects for potential cultural heritage impacts. If relevant, include mitigation measures proposed in the ESMF and include additional measures in ESIA or site-specific ESMPs.</p>	<p>Screen, prepare, and implement the mitigation measures before civil works. Implement throughout Project implementation.</p>	EDC, Contractors, and Subcontractors for Component 1
8.2	<p>CHANCE FINDS</p> <p>Contractors and subcontractors shall follow the Chance Finds Procedures described in the ESMF. These procedures set out clear steps for the immediate cessation of work in the affected area, securement of the site, and prompt notification to the relevant local or national authorities. Work may only resume once authorization is provided by the relevant authority.</p>	<p>Include in site-specific ESMPs before construction. Implement the procedures throughout Project implementation.</p>	EDC, Contractors, and Subcontractors for Component 1

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Contractors shall ensure that these procedures, aligned with national regulations and ESS8, are included in site-specific ESMPs and that all workers receive training on the chance finds protocol throughout implementation.		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) Prepare, establish and implement an ESMS for SME Bank (here as policy bank) as well as update the existing ESMS of the FTB Bank (here as participating financial institution) that receive support from the Project, in align with WB ESS 9. The relevant labor management requirements under ESS2 also apply to both policy bank and participating financial institution.	Prepare, establish, and implement an ESMS for SME Bank within 90 days of Project effectiveness. Update the existing ESMS of FTB Bank within 90 days of Project effectiveness.	SME Bank, FTB Bank
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN 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. Ensure that stakeholder engagement covers all phases of the Project and includes vulnerable or marginalized groups. Maintain records of stakeholder consultations and feedback, and integrate these into Project decision-making and reporting as guided in the SEP.	Update and disclose the SEP prior to Project effectiveness. Implement and monitor SEP activities throughout Project implementation. Report regularly on stakeholder engagement in Project monitoring reports.	EDC and MME, PMUs
10.2	PROJECT GRIEVANCE MECHANISM 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.	Establish the grievance mechanism prior to project effectiveness, and thereafter maintain and operate the mechanism throughout Project implementation. Report on Grievance Mechanism performance regularly in monitoring reports.	EDC and MME, PMUs Contractors and subcontractors Village and Commune Chiefs

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>Establish Grievance Redress Committees (GRCs) where none exist, with multiple intake channels as described in the Stakeholder Engagement Plan (SEP).</p> <p>Publicly display Grievance Mechanism procedures and GRC contact information at project sites.</p> <p>Maintain detailed grievance logs, track resolution progress, and report regularly as part of Project monitoring and reporting.</p>		
<p>INDICATORS FOR IMPLEMENTATION READINESS [This subsection lists the ESCP actions (by their numbering in the first column of the ESCP) that are identified as relevant to monitor project readiness from an E&S standpoint. These may include actions related to: i) establishment of E&S risk management units in the Project Implementation Entities, ii) recruitment and training of E&S staff within Project Implementation Entities, iii) Memorandums of Understanding or other written agreements/arrangements between Project Implementation Entities and other concerned agencies to ensure proper coordination of E&S risk management activities; iv) E&S effectiveness or disbursement conditions, if deemed warranted, v) ES assessments and plans to be prepared by the Borrower at the onset of implementation; vi) other project-specific requirements related to E&S readiness for implementation].</p>		
<p>The following actions are indicators for implementation readiness:</p> <p>Action A: Establishment of PMUs with qualified E&S staff</p> <p>Action 1.1: Disclosure of ESMF</p> <p>Action 2.1: Disclosure of LMP</p> <p>Action 5.1: Disclosure of RPF</p> <p>Action 7.1: Disclosure of IPPF</p> <p>Action 9.1: Establishment of ESMS</p> <p>Action 10.1: Disclosure of SEP</p> <p>Action 10.2: Establishment of Grievance Mechanism</p>		