

REPUBLIC OF RWANDA



MINISTRY OF FINANCE AND ECONOMIC PLANNING

Additional Financing for Access to Finance for Recovery and Resilience Project (P175273)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP) DRAFT REPORT

February 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Rwanda, (the Recipient) is implementing the additional financing -for Access to finance for Recovery and resilience (AFIRR) Project, with the involvement of the Development Bank of Rwanda (BRD) under the coordination of the Ministry of Finance and Economic Planning as set out in the original and additional financing agreements and the grant agreement. The Association has agreed to provide the additional financing (P175273) for the AFIRR Project, as set out in Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original, 1st additional and 2nd 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 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 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 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 through BRD under MINECOFIN coordination agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative/Minister of the Ministry of Finance and Economic Planning (MINECOFIN). 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 SUPPORT¹		
<p>A</p> <p>ORGANIZATIONAL STRUCTURE</p> <p>a. BRD to maintain a PIU with qualified staff and resources to support management of environmental, social, health and safety risks and impacts of the Project including: an Environmental Risk Management Specialist, a Social Risk Management Specialist, and an Environmental and Social Risk Management Specialist.</p> <p>b. Entering collaboration arrangements with Participating Financial Institutions (PFIs) to manage E&S risks and impacts of the Project</p>	<p>a. BRD to maintain on full-time basis an Environmental Risk Management Specialist, a Social Risk Management Specialist, and an Environmental and Social Risk Management Specialist throughout the project implementation period. The team is now in place after merging BDF with BRD.</p> <p>b. To sign a memorandum of understanding prior to any disbursement of funds to PFIs</p>	<p>a. MINECOFIN with BRD</p> <p>b. BRD with PFIs</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the capacity building plan for PIU staff and project workers covering:</p> <ul style="list-style-type: none"> • Stakeholder mapping and engagement, including AF2-specific stakeholder groups • Environmental and social screening and ESMP implementation for expanded public works and minor civil works • Grievance handling mechanisms, including SEA/SH-sensitive procedures • Emergency preparedness and response, including water-related and small-scale infrastructure risks • Community health and safety • Association incident reporting requirements • Implementation of Labor Management Procedures • Occupational Health and Safety for labor-intensive public works and service-based public works • GBV/SEA/SH risk mitigation • Communicable diseases 	<p>Refresher and targeted trainings shall explicitly address second Additional Financing (AF2) related trainings.</p> <p>Refresher Training within 2 months after the AF2 Effective Date and periodically thereafter.</p>	MINECOFIN with BRD
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit regular monitoring reports to the Association on the environmental, social, health and safety (ESHS) performance of the Project, including AF2-supported activities, covering:</p> <ul style="list-style-type: none"> • Implementation of the ESCP • Status of preparation and implementation of E&S instruments • Stakeholder engagement activities as per the SEP • Grievances received and resolved, including SEA/SH cases 	<p>Semi-annual reports to the Association throughout the Project Implementation commencing after the AF2 Effective Date.</p> <p>Submit each report to the Association no later than 45 days after the end of each reporting period.</p>	MINECOFIN with BRD

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	<p>(aggregated and anonymized)</p> <ul style="list-style-type: none"> • E&S performance related to labor-intensive and service-based public works • Incidents and accidents reported under Section E • Capacity building activities carried out 	Throughout the Project implementation
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Contractors' monthly ESHS reports are currently not applicable, as Project activities are predominantly implemented through community-based approaches. However, where contractors or third-party service providers are engaged under AF2-supported activities, appropriate ESHS reporting requirements shall be incorporated into contracts and applied proportionately, consistent with the ESCP, ESMPs, and LMP.</p>	As applicable during Project implementation
E	<p>INCIDENTS AND ACCIDENTS</p> <p>The Recipient through the oversight and coordination of MINECOFIN will promptly notify the Association of any incident or accident related 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, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury (ex.: cuts from using sharp equipment, hands crushing, skin burns by fire or ovens, falls from height, etc.). The Recipient will provide sufficient details regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association's request, prepare a report on the incident or accident and propose some measures to address it and prevent its recurrence.</p>	<p>Notify the Association immediately and not later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent reports to the Association within a timeframe acceptable to the Association</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
<p>1.1 ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>(i) The Recipient through MINECOFIN shall update the ESMS</p> <p>(ii) The Recipient through MINECOFIN shall cause BRD to ensure that the requirements of ESMS and the Project ESMF,, are integrated into the PFIs, LEs, MSMEs through participation and sub-loan agreements.</p> <p>(iii) The Recipient through MINECOFIN shall cause BRD to ensure that PFIs adopt and implement their respective ESMSs that meet the ESSs, including ESS2 and ESS 9 requirements, and capacity considerations</p> <p>(iv) MINECOFIN shall cause BRD during implementation, and based on the result of the Environment and Social (E&S) screening of subprojects submitted for funding, where necessary shall require, through Participation Agreements with PFIs, LEs and MSMEs to prepare the required E&S assessment and plans as specified in the respective ESMSs and ESMF and adopted PFIs' ESMSs such as ESIAs, ESMPs or SPR as required by the national law and consistent with the ESSs and the ESF instruments (such as ESMF, ESMSs, and SEP). Large enterprises and SMEs' project activities/subprojects with low to moderate environmental and social risks will be addressed through the institutional ESMSs for BRD as required. If there are any large enterprises and SMEs' project activities/subprojects with substantial risk, they will be managed as per the ESMF's guidelines and processes.</p>	<p>(i) BRD's ESMS, ESMF and LMP are updated before AF2 Effective Date and then implemented throughout the implementation</p> <p>(ii) Corporate ESMS for new PFIs to be assessed and approved by the BRD, and MINECOFIN prior to approval of any loans to PFIs and PFI sub-loans using Project resources.</p> <p>(iii) Prior to fund disbursement to PFIs and thereafter throughout the project implementation.</p> <p>(iv) Prepare E&S assessments and plans as required by ESMS/ESMF and ensure they are approved by Rwanda Development Board (RDB) as required by the national law and by the PFIs prior to the financing of the large enterprises and SMEs. BRD shall review the plans to ensure completeness and</p>	<p>(i) MINECOFIN with BRD</p> <p>(ii) MINECOFIN with BRD</p> <p>(iii) MINECOFIN with BRD</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>(v) BRD through the institutional ESMS shall implement the screening checklists for subproject environment and social risk rating, exclusion list, monitoring and reporting templates to be used by new District SACCOs to ensure harmonization during implementation. The screening and reporting tools shall form part of the participation agreements to be signed between BRD and District SACCO, and BRD shall ensure District SACCO's compliance to these guidelines throughout the project implementation</p>	<p>compliance with ESSs before disbursement of funds to sub-Recipients.</p> <p>(v) Adopt and implement E&S screening checklist for subprojects E&S risk categorization, E&S monitoring and reporting templates, and exclusion lists throughout the Project implementation period.</p>	<p>(iv) BRD and SACCOs</p>
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the SEA/SH mitigation plan, the Labor Management Procedures, and code of conduct, into the E&S 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 E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Bank.</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 Bank upon request.</p>	<p>MINECOFIN with BRD</p>
1.3	<p>TECHNICAL ASSISTANCE</p> <p>The Recipient through MINECOFIN shall cause BRD to carry out all technical assistance (TA) activities under the Project including, inter alia, studies (including feasibility studies if applicable), capacity building, supervision, etc. in accordance with the Terms of Reference (TOR) agreed upon with the Association, that are consistent with the ESSs and thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<p>Throughout the Project implementation</p>	<p>MINECOFIN with BRD</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.4	<p>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</p> <p>Ensure that the Contingent Emergency Response Component Manual and Emergency Action Plan include a description of the E&S assessment and management arrangements for the implementation of the CERC component 4, in accordance with the ESSs.</p> <p>Implement the E&S provisions of the CERC Manual (including, the CERC-ESMF/ESMF Addendum)</p>	<p>The preparation of the CERC Manual, including E&S Provisions, in form and of substance acceptable to the Association is a withdrawal condition under the Financial Agreement.</p> <p>In accordance with the timeframes specified in the CERC Manual including the CERC-ESMF/ESMF Addendum</p>	MINECOFIN with BRD
1.5	<p>ASSOCIATED FACILITIES</p> <p>Not applicable to the project</p>	Not applicable	N/A
1.6	<p>USE OF RECIPIENT'S ENVIRONMENTAL AND SOCIAL FRAMEWORK</p> <p>Not applicable to the project</p>	Not applicable	N/A
1.7	<p>COMMON APPROACH</p> <p>Not applicable to the project</p>	Not applicable	N/A
1.8	<p>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING</p> <p>Not applicable to the project</p>	Not applicable	N/A
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>(i) MINECOFIN shall cause BRD to maintain and implement the Labor Management Procedures (LMP) for the Project, embedded in BRD ESMS, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response),</p>	<p>(i) Implement and monitor the LMPs throughout the Project implementation and report through semi-annual progress reports.</p>	<p>(i) MINECOFIN with BRD</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p> <p>(ii) BRD shall require new PFIs, Large Enterprises and SMEs to prepare, adopt and implement LMPs, consistent with ESS2 in a manner acceptable to the Association</p> <p>(iii) MINECOFIN shall require BRD to maintain and implement its human resources (HR) policy and procedures consistent with requirements under national/entities law and the LMPs which are compliant with ESS2 and part of the ESMS, and ensure that Project workers are informed of and have access to these policies</p>	<p>(ii) Adopted prior to signing participation and sub-loan agreements respectively</p> <p>(iii) Implement and monitor HR policy and procedure as stated in their LMPs throughout the Project period, and report through semi-annual progress reports.</p>	<p>(ii) MINECOFIN with BRD, B PFIs, LEs and SMEs</p> <p>(iii) MINECOFIN with BRD</p>
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>(i) The Recipient through MINECOFIN shall require BRD, PFIs and sub- Recipients to maintain occupational health and safety (OHS) measures consistent with ESS2, to be specified in the LMPs as well as in the ESMS, project ESMF and site-specific E&S tools prepared for the project.</p> <p>(ii) The Recipient through MINECOFIN shall require BRD, PFIs and sub- Recipients to implement OHS measures as per their respective ESMSs, project ESMF, Association Group General Environmental Health and Safety Guidelines and relevant Industry Sector EHS Guidelines for agro- industry, transport, etc., national laws and relevant regulations, LMPs, and ESSs 1</p>	<p>(i) Maintain throughout Project implementation.</p> <p>(ii) Throughout Project implementation</p>	<p>(i) MINECOFIN with BRD, PFIs and sub-Recipients</p> <p>(ii) MINECOFIN with BRD, and PFIs</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	and 2.		
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>(i) The Recipient through MINECOFIN shall require BRD to operate and maintain a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p> <p>(ii) The Recipient through MINECOFIN shall require BRD to ensure that the PFIs require to have in place a worker's grievance redress mechanism as described in the LMP, in line with national labor law, their respective ESMSs and consistent with ESS2</p>	<p>(i) Operate and maintain the grievance mechanism throughout Project implementation.</p> <p>(ii) For new PFIs and subprojects establish a worker's grievance redress mechanism.</p>	<p>(i) MINECOFIN with BRD</p> <p>(ii) MINECOFIN with BRD</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>BRD shall require PFIs to prepare, maintain, adopt and implement measures and actions to assess and manage specific risks and impacts on micro companies using hazardous materials and other wastes in their operations and incorporate these measures in the ESIA, ESMPs or SPRs as required to be prepared, implemented and monitored in a manner acceptable to the BRD and Recipient commitment</p>	Throughout Project implementation	BRD, PFIs and MSMEs
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>(i) The Recipient through MINECOFIN shall require BRD to maintain and implement resource efficiency and pollution prevention and management measures consistent with ESS3 into BRD ESMS and cascaded through the PFIs sub-loan agreements as well as in the ESMF.</p> <p>(ii) BRD, and PFIs shall require large enterprises (LEs) and SMEs to prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts on resource</p>	<p>(i) Throughout Project implementation</p> <p>(ii) Throughout Project implementation</p>	<p>(i) MINECOFIN with BRD, and PFIs</p> <p>(ii) BRD, PFIs, LEs</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	efficiency and pollution prevention and management to the community arising from all AFIRR subprojects, and incorporate these measures in the ESIA, ESMPs or SPRs as appropriate in accordance with the approved project ESMF, the ESS3 requirements and the national law, BRD ESMS and commensurate with subproject risks, in a manner acceptable to the BRD and Recipient commitment		and SMEs
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY The Recipient through MINECOFIN shall require BRD, PFIs, LEs, SMEs to incorporate measures to manage traffic and road safety risks as required in the ESIA, ESMPs or SPRs to be prepared	Adopt and implement the ESIA, ESMPs or SPRs throughout the project implementation.	BRD, PFIs, LEs and SMEs
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage community health and safety risks associated with AF activities	Community health and safety risks associated with AF2-supported activities shall be assessed and mitigation measures included in site-specific ESMPs prior to commencement of the relevant activities and implemented throughout their execution	MINECOFIN with BRD, PFIs, LEs and SMEs
4.3	SEA AND SH RISKS The Recipient through MINECOFIN shall require BRD to maintain and implement a SEA/SH Action Plan reflected in the ESMF as required in accordance with the Association's SEA/SH risk screening tools. For Large enterprises and SMEs to prepare, maintain and implement, as appropriate and necessary, SEA/SH Action Plans with the support of the BRD and reflect these plans in the ESIA, ESMP and SPRs	Put in place the SEA/SH Action Plans, as appropriate, and implement them throughout Project implementation.	MINECOFIN with BRD, PFIS and LEs and SMEs
4.4	SECURITY MANAGEMENT	Not applicable	Not applicable

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Currently not relevant for the project		
4.5	DAM SAFETY (For Annex A ESS4) AF activities do not include small dams,	Not applicable	Not applicable
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT PLANS In accordance with the exclusion list under 1.5 above, any activities resulting or anticipated to result in permanent, or temporary physical or economic displacement shall be ineligible for Project financing. This will be based on a screening mechanism that excludes subprojects with land acquisition and resettlement impacts. The screening mechanism will also include a protocol requiring subproject application to include documentation that they own any land they will use or will acquire for the project exclusively on a willing buyer/willing seller basis. It will also consider any restriction to land access and loss of income or livelihoods likely to result from the project. This screening process will be outlined in the ESMF. Subproject applications shall include documentation that proponents own any land they will use or that any land they will use or will acquire for the project will be exclusively on a willing buyer /willing seller basis or mitigation measures for any restriction to land access, loss of income or livelihoods	Subproject screening process by BRD, and PFIs prior to signing participation and sub-loan agreements respectively and thereafter implementation throughout Project implementation.	BRD, and PFIs
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Prepare and implement a Biodiversity Management arrangement as part of the ESMF and specific ESMPs consistent with ESS6	Adopt the ESIAs/ESMPs/SPRs prior to sub-loan disbursements, and thereafter implement the ESMPs or SPRs throughout Project implementation	BRD, PFIs, large enterprises, micro- and SMEs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES [FRAMEWORK] [PLAN] or [PLANS] Not applicable	Not applicable	Not applicable
ESS 8: CULTURAL HERITAGE			
8.1	CHANCE FINDS Chance-find procedures consistent with ESS8 will be applied if cultural heritage is unexpectedly encountered. The generic Chance-find procedures will be annexed in the ESMF consistent with ESS8.	Maintain the description of the chance finds procedures in the ESMF, ESMSs and ESIA/ESMP. Implement these procedures throughout Project implementation.	MINECOFIN with BRD
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) 1. The Recipient through MINECOFIN shall require BRD to maintain and implement the BRD ESMS consistent with ESS9 and in a manner acceptable to the Association. Furthermore, develop and implement any amendment in the ESMS to support its successful application as may be needed to implement the Project in accordance with the ESS9 and to the Association's satisfaction. 2. BRD shall require PFIs to develop, adopt, maintain and implement the respective PFIs' ESMSs consistent with ESS9 and in a manner acceptable to the BRD 3. BRD shall implement any additional E&S instruments prepared for the project (such as SEP, ESMF and LMP embedded in ESMSs) or any amendments in the ESMSs to support its successful application as may be needed to implement the Project in accordance with the ESSs and to the Association's satisfaction.	1. ESMS for BRD maintained and implemented throughout Project implementation. 2. New PFIs to establish and operationalize ESMSs before funds' disbursement and with the applicable BRD ESMS. 3. Complementary instruments to be maintained and operationalized throughout Project implementation	1. MINECOFIN with BRD 2. BRD and PFIs 3. MINECOFIN

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>4. The Recipient through MINECOFIN shall require BRD, PFIs that large enterprises and SMEs prepare ESIA, ESMPs or SPR, implement and monitor sub-project specific environmental and social management plans (ESMPs) and submit implementation status report as required by the ESMF and national law in manner acceptable to the Association and MINECOFIN. These requirements shall also be done as specified in the applicable ESMSs and PFI loan agreements. Reporting should also meet ESCP requirements in item on Monitoring and Reporting</p>	<p>4. ESIA, ESMPs and SPRs to be prepared by large enterprises and SMEs as appropriate, approved by RDB and reviewed by PFIs before signing sub-loan agreements where required by the National Law and the ESMS, as well as submit implementation status report quarterly after receiving the sub-loans.</p>	<p>with BRD</p> <p>4. BRD, PFIs, LEs, SMEs</p>
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Implement a Stakeholder Engagement Plan for the Project, consistent with ESS10.</p> <p>The SEP shall include measures to, inter alia, engagement of new stakeholders, 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.</p>	<p>Update and disclose the updated SEP prior to the AF2 Effective Date.</p> <p>Implement throughout Project implementation.</p>	MINECOFIN with BRD
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Update and operate the Project GRM to ensure accessibility and effectiveness for AF2 activities, including:</p> <ul style="list-style-type: none"> Expanded grievance uptake for labor-intensive and service-based public works. Reinforced SEA/SH-sensitive channels proportionate to 	<p>Update and publicize the grievance mechanism before commencement of any project work.</p>	MINECOFIN with BRD.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>increased workforce size and community interactions.</p> <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>	Implement throughout Project implementation.	
INDICATORS FOR IMPLEMENTATION READINESS			
<p>The following actions are indicators for implementation readiness:</p> <ol style="list-style-type: none"> I. Revise, disclose and adopt the Environmental and Social Management Framework (ESMF) II. AF2 will be implemented using the existing ESMS, with targeted updates to explicitly cover AF-financed activities and to strengthen implementation capacity commensurate with the scale-up. III. Revise, consult upon and disclose the Labor Management Procedures (LMP) IV. Revise, consult upon and disclose the Stakeholder Engagement Plan (SEP) V. Update and publicize the project GRM VI. Disclose the ESCP 			