Ukraine

Ministry of Economy and Environment / Ukraine Finance Housing Company

Resilient, Equitable and Accessible Credit for Housing Project

(P517177)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Negotiated Version

October 30, 2026

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ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Ukraine (the Borrower/Recipient) will implement the Resilient, Equitable and Accessible Credit for Housing Project (the Project), with the involvement of the Ukraine Finance Housing Company (UFHC) and Ministry of Economy and Environment (MOEE) as set out in the Loan Agreement and Grant Agreement (the Agreements). The International Bank for Reconstruction and Development and the International Development Association (the World Bank), as well as the World Bank, acting as the administrator of the Ukraine Relief, Recovery, Reconstruction and Reform Multi-Donor Trust Fund (hereinafter the "Bank") have agreed to provide financings for the Project, as set out in the referred Agreements.

2. The Borrower/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 Bank. 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 Borrower/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 Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreement[s], the Borrower/Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.

4. As agreed by the Bank and the Borrower/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 Bank and the Borrower agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Borrower/Recipient's Representative specified in the Agreements of the Ukraine Finance Housing Company and Ministry of Economy and Environment. The Borrower 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.

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	**ORGANIZATIONAL STRUCTURE** a. For Component 1, MOEE shall establish and maintain a Project Implementation Unit (PIU) with one qualified environmental and social (ES) specialist to support management of environmental and social (E&S) risks and impacts of the Project. b. For Component 2, UFHC shall establish and maintain a PIU with one qualified environmental specialist and one qualified social and stakeholder engagement specialist, with adequate resources to establish, implement and oversee the apex ESMS and the E&S performance of PFIs and their Project-supported portfolios. c. Require each participating PFIs to designate a qualified staff member responsible for E&S risk management, with roles and responsibilities defined in accordance with the ESMS, prior to receiving financing under Component 2. - As a condition of eligibility and participation under Component 2, each participating PFI shall maintain qualified personnel responsible for E&S risk management, with roles and responsibilities defined in accordance with the apex ESMS.	a. Establish a PIU and hire or appoint one ES specialist no later than 30 days after Effective Date and thereafter maintain this position throughout Project implementation. b. Establish a PIU and hire one environmental and one social specialist no later than 30 days after Effective Date and thereafter maintain these positions throughout Project implementation. c. Prior to receiving financing under Component 2 and maintained throughout Project implementation	a) MOEE b,c,) UFHC

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	**CAPACITY BUILDING PLAN/MEASURES** 1. UFHC shall develop and implement a capacity-building plan to support establishment and implementation of the apex ESMS and compliance with ESS9 by UFHC and participating PFIs. 2. MOEE shall ensure that relevant staff receive training on ESF requirements applicable to Component 1, including assessment of E&S implications of reforms, stakeholder engagement, monitoring and reporting.	1. Adopt no later than 60 days after the Effective Date and thereafter implement and update, as needed, throughout Project implementation. 2. Throughout Project implementation	1. UFHC 2. MOEE
MONITORING AND REPORTING			
C	**REGULAR REPORTING** Prepare and submit to the Bank regular monitoring reports on the E&S performance of the Project. MOEE shall report on Component 1, and UFHC shall report on Component 2, including consolidated information received from participating PFIs. The reports shall include: • Status of preparation and implementation of E&S documents required under the ESCP and ESMSs. • For Component 1, status and results of E&S assessment and stakeholder engagement for PBC-supported reforms. • For Component 2, results of E&S screening and risk classification and the ESHS performance of the Project-supported portfolios of PFIs, including identified material risks, mitigation measures, exceptions and follow-up actions. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • Number and status of resolution of incidents and accidents reported under action D below.	Submit quarterly reports to the Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than 45 days after the end of each reporting period.	MOEE/UFHC

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	**INCIDENTS AND ACCIDENTS** Notify the Bank 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; 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 Bank upon request. Arrange for an appropriate review 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.	Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request. Provide review report and Corrective Action Plan to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.	MOEE/UFHC
E	**PFI ENVIRONMENTAL AND SOCIAL REPORTING** a) UFHC shall prepare and submit to the Bank an Eligibility Confirmation Report demonstrating that each participating PFI has met the eligibility and institutional requirements established in the apex ESMS. The report shall document the PFI's adopted ESMS arrangements, undertaken gap-filling measures, adopted mortgage-specific E&S screening procedures, application of the Project Exclusion List, designated E&S personnel, grievance mechanism, monitoring and reporting. b) UFHC require each participating PFI to prepare and submit to UFHC regular E&S monitoring reports on its Project-supported mortgage portfolio. UFHC shall review the PFI reports, follow up on identified gaps and corrective actions, and consolidate the results in its regular E&S reports to the Bank under Action C. As a condition of participation, require each PFI, through the apex ESMS and relevant participation agreement, to submit regular E&S monitoring reports on its Project-supported mortgage portfolio. The apex ESMS shall define the reporting format, minimum data requirements, submission procedures, and follow-up measures for late or incomplete reporting. UFHC shall review PFI reports, follow up on gaps and corrective actions, and consolidate the results in reports to the Bank under Action C.	**a)** Submit the PFI E&S Eligibility Confirmation Report and obtain UFHC's written confirmation before disbursement through the relevant PFI **b)** Submit quarterly reports to UFHC no later than 30 days after the end of each reporting period, commencing after signature of the participation agreement and continuing throughout the PFI's participation in the Project.	UFHC; UFHC shall require implementation by PFIs
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	**ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS** a. Under Component 1, and PBC-supported reforms (PBC 1.1; PBC 2.1; PBC 4.3) with material E&S implications, MOEE, with support from UFHC as relevant, shall assess the potential E&S	a)Complete the assessment and incorporate the mitigation measures before finalization or adoption of the relevant reform	a) MOEE b-d) UFHC

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MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
risks and impacts, including impacts on disadvantaged and vulnerable groups, and incorporate the necessary mitigation measures into the relevant reform instrument, program design, operational procedures, or the POM. Where required by the applicable PBC verification protocol, MOEE shall submit documented evidence of the assessment and incorporation of the mitigation measures as part of the PBC verification package. b. UFHC shall develop, disclose and implement E&S screening procedures for Component 2 of the Project regarding activities involving housing financing, consistent with the relevant ESSs and the apex ESMS. The procedures shall be applied by participating PFIs to all activities proposed for Project financing. c. UFHC shall develop and implement an Exclusion List, consistent with the Agreements, the POM, ESS9 and the other relevant ESSs, and establish corresponding eligibility and screening procedures in the apex ESMS, including: • the housing unit is associated with substantial or high environmental and social risks and impacts; • the construction or acquisition of the housing unit entails physical and/or economic displacement of people, as defined under ESS5; • the housing unit has been constructed in legally protected areas (including areas and sites within the nature reserve fund and other environmentally sensitive areas), or in critical natural habitats or internationally recognized areas of high biodiversity value, as defined under ESS6; • the housing unit is a cultural heritage asset or is located within the boundaries of a cultural heritage site or its protection zone, as defined under ESS8; and • the acquisition of the housing unit constitutes any other activity included in the Exclusion List. UFHC will cause PFIs to apply these procedures to all housing purchases proposed for Project financing. Activities shall not be eligible for Project financing if it has not been screened in accordance with the apex ESMS or falls within the Exclusion List, including housing purchases involving substantial or high E&S risks and impacts. d. UFHC shall incorporate the applicable requirements of this ESCP, the apex ESMS and ESS9 into each Participation Agreement with a PFI under Component 2.	and, where applicable, before PBC verification and disbursement. b-c) Develop, disclose, adopt and operationalize the E&S screening procedures and Exclusion List as part of the apex ESMS prior to any financing or disbursement under Component 2. Thereafter implement them throughout Project implementation. Include the applicable requirements in each PFI participation agreement before channeling Project funds through that PFI. d)Before signing each PFI participation agreement and before channeling Project funds through that PFI.	

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	**TECHNICAL ASSISTANCE** Carry out the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Bank, 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.	MOEE/UFHC
1.3	**USE OF BORROWER/RECIPIENT'S ENVIRONMENTAL AND SOCIAL FRAMEWORK** Notify the Bank promptly upon becoming aware, in the ordinary course of activities, of any material change in the Borrower/Recipient's E&S Framework that is relevant to the Project activities under the entity's responsibility and may materially adversely affect the applicable E&S risk management arrangements. MOEE shall be responsible for Component 1 and UFHC for Component 2. Implement corrective measures agreed with the Bank and update the ESCP and related E&S instruments, as necessary, to maintain compliance with the ESSs.	a. Throughout Project implementation. b. Notify the Bank promptly after learning of a relevant change. Agree and implement corrective measures within the timeframe agreed with the Bank.	MOEE/UFHC
1.4	**ACTIVITIES SUBJECT TO RETROACTIVE FINANCING** Carry out the E&S due diligence based on the TOR agreed between the Bank and Borrower/Recipient for activities subject to retroactive financing under the UFHC-administered eOselia mortgage program - and submit the E&S due diligence report to the Bank to ensure that such activities were conducted in a manner consistent with the ESSs and that necessary time-bound actions will be taken to address any significant gaps identified during the due diligence.	Submission of the E&S due diligence report and no-objection by the Bank prior to disbursement of retroactive financing	UFHC
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	**USE OF THE BORROWER`S LABOR FRAMEWORK** Ensure that the terms and conditions of employment and working conditions of direct and contracted Project workers are consistent with this ESCP and applicable national labor requirements, including requirements on employment terms, non-discrimination, working hours, remuneration, occupational health and safety, and prevention of child and forced labor. Supplement these requirements through Codes of Conduct, the worker grievance mechanism, emergency preparedness and response measures, and incident-reporting procedures under this ESCP.	a) Throughout Project implementation. b) Adopt Codes of Conduct before hiring or assigning Project workers.	MOEE/UFHC

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	**OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN** Implement proportionate OHS and emergency preparedness and response measures for direct and contracted Project workers, including emergency procedures, evacuation arrangements, worker information and training, and incident reporting	Before commencement of the relevant work activities and thereafter throughout Project implementation.	MOEE/UFHC
2.3	**GRIEVANCE MECHANISM FOR PROJECT WORKERS** Establish, publicize, maintain and operate an accessible grievance mechanism for direct and contracted Project workers, consistent with ESS2.	Establish GM prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	MOEE/UFHC
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	**WASTE MANAGEMENT PLAN** Prepare and adopt Waste Management Procedures (WMP) as part of the apex ESMS to assess, exclude and manage aspects related to hazardous and non-hazardous waste, consistent with ES risk and impact screening and exclusion procedures, and in line with ESS3.	Same timeframe as Action 9.1.a below for the preparation and implementation of the apex ESMS.	UFHC
3.2	**RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** Incorporate resource efficiency and pollution prevention and management measures in the apex ESMS to be prepared under action 9.1.a below, as needed and consistent with ESSs.	Same timeframe as Action 9.1.a below for the preparation and implementation of the apex ESMS.	UFHC
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	**USE OF NATIONAL COMMUNITY HEALTH AND SAFETY REQUIREMENTS** For Project-supported transactions expected to have minimal or no adverse community health and safety risks, require PFIs to apply applicable national requirements for building and fire safety, emergency preparedness and response, traffic and road safety, and routine community health and safety, together with the Project Exclusion List. Where screening identifies material risks covered by ESS4, require the relevant ESS4 requirements and proportionate mitigation measures to be applied through the apex ESMS and PFI ESMS arrangements. - Establish in the apex ESMS eligibility, screening, and documentary verification procedures for assessing compliance with applicable community health and safety requirements. Participating PFIs shall apply these procedures as part of their appraisal process. Where material ESS4 risks are identified, PFIs shall apply the escalation, additional due diligence, mitigation, corrective action, or exclusion procedures established in the apex ESMS.	Same timeframe as Action 9.1.a below for the preparation and implementation of the apex ESMS.	UFHC

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4.2	**SEA AND SH RISKS** Incorporate proportionate SEA/SH prevention and response measures into the apex ESMS, including Codes of Conduct, staff awareness and training, and safe, confidential and survivor-centered grievance procedures with referral to relevant service providers.	Same timeframe as Action 9.1.a below for the preparation and implementation of the apex ESMS.	UFHC
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	Not relevant. Relevant eligibility and exclusion requirements are included under the apex ESMS.		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	Not relevant. Relevant eligibility and exclusion requirements are included under the apex ESMS.		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	This Standard is not relevant to the Project as no Indigenous people are identified in Ukraine		
ESS 8: CULTURAL HERITAGE			
	Not relevant. Relevant eligibility and exclusion requirements are included under the apex ESMS.		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	**ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (apex ESMS)** a. Prepare, establish and implement an apex ESMS, built on the E&S screening tool under Action 1.1.c, to identify, assess, manage, and monitor the E&S risks and impacts of activities related to the Component 2 of the Project, consistent with the ESSs, applicable national requirements, and any additional material measures set in this ESCP. Disclose a summary of each of the elements of the apex ESMS through UFHC website and allow the Bank to do so on its website, including the Exclusion List. The content and scope of the apex ESMS, as well as the TORs for its preparation, shall be proportionate to the nature and magnitude of the risks and impacts associated with Financial Intermediaries (FIs), and shall include, inter alia, the following elements: • An E&S policy; • Clearly defined labor management measures and procedures consistent with the relevant aspects of ESS2; • A clear organizational capacity and competency for implementing the apex ESMS with clearly defined roles and responsibilities; • Clearly defined procedures for E&S risk screening and management, including, inter alia, stakeholder engagement and disclosure requirements;	a) Prepare, disclose, adopt, and implement an apex ESMS prior to signing the first PFI participation agreement and prior to channeling any Project funds through a PFI under Component 2. The apex ESMS shall include, at a minimum, the E&S policy; institutional roles and responsibilities; Exclusion List; screening, risk-classification and eligibility procedures; applicable mitigation and due diligence requirements; PFI appraisal and approval procedures; monitoring and reporting arrangements; incident-notification procedures;	UFHC

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	• An Exclusion List with activities and subprojects that are not eligible for financing consistent with this ESCP and aspects of the relevant ESSs; • Clear measuring and procedures for monitoring and reporting on the E&S performance and effectiveness of the apex ESMS; • An external communications mechanism, including measures and mechanisms to respond to public and stakeholder enquiries and concerns in a timely manner; • Incidents and accidents notification and subsequent reporting requirements, and; • A designated senior management representative with overall accountability for E&S performance of FI subprojects that receive support from the Project, consistent with the requirements of ESS9 and this ESCP. b. Require PFIs that participate in the Project to comply with i) the apex ESMS, ii) the Bank's ESSs, and iii) the relevant E&S national regulations, as detailed in apex ESMS. The PFIs, according to their role, shall take the necessary measures to ensure that their subprojects have sufficient E&S risk management capacities, including by developing the necessary E&S management tools and measures to comply with the requirements of this ESCP, the Bank's ESSs, and the national regulations, and have the necessary capacity for their proper implementation, in accordance with the procedures and contents to described in UFHC's ESMS. Apex ESMS will include templates to guide the preparation of these E&S management tools and instruments. c. Promptly notify the Bank of any changes to the ESMS that may materially adversely affect the Borrower capacity to screen, identify, classify and monitor E&S risks for FIs/PFIs activities d. In case of changes to the apex ESMS, adopt and implement the material measures in a manner acceptable to the Bank, and consistent with the ESSs, and this ESCP. Notify the Bank of material changes affecting the effectiveness of the apex ESMS and implement corrective measures agreed with the Bank.	external communications mechanism; and templates necessary for application by participating PFIs. Thereafter, finalize, maintain and implement the apex ESMS, and update it as necessary in a manner acceptable to the Bank. b) As part of the E&S risk analysis process, conduct an initial analysis of potentially eligible FI subprojects before determining if such subprojects are eligible to receive support from the Project. c) Include the commitment referring to the development of the necessary E&S management tools and measures, the corresponding timeframe, and the necessary capacity for their implementation as part of the documentation that formalizes the relationship between UFHC and the PFIs, and monitor compliance throughout the implementation of FI subprojects, as relevant c. Same timeframe as Action B d. Throughout Project implementation	
9.2	**PFI ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM REQUIREMENTS**	a,b,c. For each participating PFI, complete the review,	UFHC

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	a) As a condition of eligibility and participation,, Require eligible PFIs to establish and maintain the necessary organizational capacity and competency for implementing ESMS consistent with the Bank's ESSs, with clearly defined roles and responsibilities in accordance with the provisions of Action 9.1. b) Collaborate with PFIs to review and enhance their existing ESMS functions, applying gap-filling measures where necessary, or require PFIs to establish ESMSs in case of the absence of such, in line with the requirements of the relevant ESSs and the requirements of ESMS. Require PFIs to disclose a summary of each of the elements of their ESMSs through PFIs' websites, including the Exclusion List. c) Require PFIs to apply E&S risk screening procedures for all activities to be financed under Component 2 of the Project, as set out in Action 1.1 of this ESCP. Require PFIs to exclude ineligible activities and apply appropriate mitigation measures for the activities where E&S risks and impacts are identified, consistent with the requirements of the relevant ESSs and the ESMSs of the UFHC and the PFIs. d) Require PFIs to promptly notify UFHC of any changes to the PFIs' ESMS functions that may materially adversely affect the PFIs' capacity to screen, identify, classify, manage, and monitor E&S risks for PFIs' activities. In case of changes to the PFIs' ESMS, require PFIs to adopt and implement the material measures in a manner acceptable to the Bank, and consistent with the ESMS, relevant ESSs, and this ESCP. Any remedial measures agreed with UFHC to address said changes shall be promptly shared with the Bank.	establishment or upgrading of its ESMS; designate a qualified E&S focal point; disclose a summary of the PFI ESMS, including the Exclusion List; and obtain UFHC confirmation that the arrangements comply with the apex ESMS, prior to signing the participation agreement and, in all cases, prior to any financing or disbursement through that PFI under Component 2. Thereafter maintain and im plement the PFI ESMS and monitor compliance throughout the PFI's participation d)Require PFIs to notify of any changes no later than 48 hours after learning of the changes. Adopt and implement the material measures within 3 (three) months after agreeing with the Bank on the specific nature of the measures.	
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	**STAKEHOLDER ENGAGEMENT PLAN** a) 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.	a) Implement the SEP throughout Project implementation.	a) MOEE/UFHC b) MOEE c) d) UFHC

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	b) For Component 1, MOEE, with support from UFHC as relevant, shall undertake stakeholder engagement and consultations for PBC-supported reforms in accordance with the SEP, proportionate to their potential E&S implications. Engagement shall include relevant government and regulatory institutions, PFIs, prospective beneficiaries, borrower and consumer representatives, civil society organizations, legal-aid providers, and disadvantaged and vulnerable groups and organizations representing them. Consultation outcomes and how relevant stakeholder feedback has been considered shall be documented. c) For Component 2, UFHC shall undertake proactive information disclosure and stakeholder engagement to support access to the new mortgage program and informed borrower decision-making. UFHC shall require PFIs to provide prospective borrowers with clear and accessible information on eligibility criteria, application procedures, subsidy and loan terms, affordability and repayment obligations, applicable borrower protections, consequences of default and mortgage enforcement, grievance channels, and available support or referral mechanisms. Engagement shall continue during loan servicing, including early communication with borrowers experiencing repayment difficulties. d) UFHC and PFIs shall maintain external communication arrangements consistent with the SEP and the apex ESMS to receive and respond to stakeholder inquiries, concerns, feedback and suggestions, including anonymously. Differentiated engagement measures shall be applied for disadvantaged and vulnerable groups, including accessible formats, targeted outreach, trusted intermediaries and assisted offline channels.	b) For Component 1, conduct engagement early enough to inform the preparation of the relevant reform and before verification under the applicable PBC, as relevant. c) and d) Include Component 2 external communication and borrower-information requirements in the apex ESMS before any financing or disbursement under Component 2 and in each PFI participation agreement before channeling Project funds through that PFI.	
10.2	**PROJECT GRIEVANCE MECHANISM** MOEE and UFHC shall 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.	Establish the grievance mechanism no later than thirty (30) days after the Effective Date and thereafter operate and maintain throughout Project implementation.	MOEE/UFHC
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: a) MOEE PIU established and staffed with one qualified E&S specialist (Action A(a)).			

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MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
b) UFHC PIU established and staffed with one qualified environmental specialist and one qualified social and stakeholder engagement specialist (Action A(b)). c) Capacity-building plan and measures for MoEE, UFHC and PFIs adopted (Action B). d) UFHC apex ESMS adopted, disclosed and operational (Action 9.1). e) Codes of Conduct adopted for all direct and contracted Project workers (Action 2.1). f) Worker Grievance Mechanism established, communicated to Project workers and operational (Action 2.3). g) Project Grievance Mechanism established, publicized, accessible through the defined submission channels and operational (Action 10.2).		

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