

## ESMP MANDATORILY ANNEXED TO THE FINANCING AGREEMENT (FA)

### General Considerations

1. Access Bank is planning to implement a Trade Finance Instrument. The Bank has agreed to provide financing, implementation support, and monitoring for the Project, subject to Board approval.
2. Access Bank will implement measures and actions of this Environmental and Social Management Plan<sup>1</sup> (**ESMP**) so that the Project meets all the requirements of the Bank Environmental and Social Operational Safeguards (**OS**) and the National policy and legal requirements.
3. Where the ESMP refers to specific plans, whether they have already been prepared or are to be developed, the ESMP requires compliance with all mandatory provisions of such plans.
4. The table below summarises the required material measures and actions, the basis of the requirement, the timing of the measure or action, and the criteria for determining whether the measure or action has been successfully achieved. Access Bank is responsible for compliance with all ESMP requirements even when an entity other than the Project Implementation Unit (PIU) implements specific measures and actions.
5. Access Bank will monitor and report to the Bank the implementation of the material measures and actions set out in this ESMP as required by the ESMP and the conditions of the legal agreement. The Bank will monitor and assess the progress and completion of the measures and actions throughout the implementation of the Project.
6. As agreed by the Bank and Access Bank, this ESMP may be revised from time to time during Project implementation to reflect adaptive risk management of project changes and unforeseen circumstances or in response to an assessment of project performance conducted under the ESMP itself. In such circumstances, Access Bank will propose and agree to changes with the Bank and then update the ESMP to reflect such changes.

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<sup>1</sup> The ESMP refers to all the E&S risks/impacts and measures, as approved in all the disclosed E&S documents and agreed between the Bank and Borrower. For projects involving multiple subprojects, that are identified, prepared and implemented during the course of the project, the Borrower will need to demonstrate to the Bank, before the project appraisal, through the preparation of E&S documentation of a sample of subprojects, that it has the capacity to carry out appropriate environmental and social assessment of subprojects, and prepare and implement such subprojects in accordance with the national laws and the OSs. (*Section III.2.3 of Bank's ESP and section D of OSI*)

<b>Material Actions<sup>2</sup> to Manage the Project's E&amp;S Risks and Impacts</b>		<b>Basis for Requirement</b>	<b>Key Performance Indicator</b>	<b>Indicative Timing/Deadline</b>
1	Periodic E&S implementation report to the Bank	Bank's ESP and OS1	Reports submitted on time, in good standard	Two weeks after the due period
2	Recruitment of E & S specialists as part of the Project Implementation Unit	Disclosed ESIA, OS1	Not applicable, ABN to use existing E&S staff	Not applicable
3	Establishment of the Project Grievance Redress Mechanism (GRM) and disclosure to the Public	OS1, OS10, and National requirements	GRM is in place	Not applicable
4	Payment of compensation and reinstallation of affected people	SO10	Not applicable	Not applicable
5	Incorporation of site-specific E&S measures in the request for proposals	SO1 & national requirements	Where applicable	Prior to financing sub-projects
6	Submission of high-risk activity's Contractor ESMP (C-ESMP) to Bank clearance	Bank's ESP and OS1	Not applicable	Not applicable
7	Establishment of the Contractor's Grievance Mechanism (GM) and information on workers	OS1, OS2, SO10, and Bank's Disclosure and Access to Information Policy	Individual Sub-Project to provide GRM (Where applicable )	Prior to financing sub-projects (Where applicable )
8	Obtaining nationally required licences before commencement of subject activities (excavations, tree-cutting, working at height, working in confined spaces, etc.)	OS1, OS2, and national labor laws	Individual Sub-Project to provide (Where applicable )	Prior to financing sub-projects (Where applicable )
9	Preparation, approval, and disclosure of specific E&S documents during Project implementation, including prior review of Category 1 terms of reference by the Bank	Bank's ESP, OS1, and national requirements	Not applicable	Not applicable
10	Engagement with concerned stakeholders of each relevant specific E&S activity	OS1, OS10, Bank's Disclosure and Access to Information Policy	Where applicable	As soon as practicable after an incident
11	Establishment of Emergency Preparedness and Response mechanism	OS1 & OS4, national legislation on contingencies et	Individual Sub-Project to provide (Where applicable )	Prior to financing sub-projects (Where applicable )

<sup>2</sup> Please add any relevant key actions and/or indicate "Not applicable" in the third column ("Basis for requirement") for actions that are not applicable to the project.

<b>Material Actions<sup>2</sup> to Manage the Project's E&amp;S Risks and Impacts</b>		<b>Basis for Requirement</b>	<b>Key Performance Indicator</b>	<b>Indicative Timing/Deadline</b>
12	Appropriate and timely handling of complaints/grievances	Bank's ESP and OS1	Prior to financing sub-projects (Where applicable )	Prior to financing sub-projects (Where applicable )
13	Notification to riparian or alert to downstream exposed peoples	Bank's ESP and OS1, applicable International Treaty/Convention ratified	Not applicable	Not applicable
14	Capacity building of key project implementers	OS1	Integration of ESMS into key project implementers (Where applicable )	Prior to financing sub-projects, or at renewal stage period. (Where applicable )
15	Implementation of ESMS/ESAP <sup>3</sup>	OS1 and OS9, national requirements	ESMS developed and implementation ongoing	Not applicable
15.1	<i>Approval of any required E&amp;S management procedure</i>	OS1 and OS9, national requirements	Management sign off	Annually
15.2	<i>Establishment of the E&amp;S unit</i>	OS1 and OS9, national requirements	E&S Unit established and functional	Not applicable
15.3	<i>Capacity Building of the E&amp;S Unit</i>	OS1 and OS9, national requirements	Ongoing	Annual
15.4	<i>Processing the Value Chain E&amp;S due diligence</i>	OS1 and OS9, national requirements	E&S due diligence is done for sub-projects (Where applicable )	Prior to financing/disbursement (Where applicable )
16	Suspending works in the event of EOHS risk or incident, immediately notify the Bank, and resume works only upon no objection of the Bank.	Bank's ESP	Evidence of written undertaking from sub-project owners	Immediately and no later than 72 hours after the occurrence
17	Prepare the root-cause analysis (RCA) of any fatal EOHS incident and implement the Corrective Action Plan (CAP).	Bank's ESP and OS1	Where applicable	As soon as practicable after an incident
18	Disclosure of E&S reports to the public	OS1, OS10, Bank's Disclosure and Access to Information Policy	Sustainability Disclosure Report	Annual

<sup>3</sup> Applies to non-sovereign operations and public sector projects implemented by permanent autonomous Agencies/Institutions.