Republic of Armenia
Ministry of Labor and Social Affairs

Housing Response and Mortgage Market Enhancement Project
(P508310)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Negotiated Version

December 1, 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Armenia (the "Borrower") will implement Parts 1 and 3 of the Housing Response and Mortgage Market Enhancement Project (the "Project"), with the involvement of the Ministry of Labor and Social Affairs ("MLSA") as set out in the Financing Agreement between the Borrower and the International Bank for Reconstruction and Development (IBRD) (the "Bank") (the "Financing Agreement") and in the Grant Agreement (the "Grant Agreement") between the Borrower and the Bank, acting as Trustee of the IBRD Surplus-Funded Livable Planet Fund, all in coordination with the National Mortgage Company ("NMC") which is responsible for implementing Part 2 of the Project pursuant to the Loan Agreement between the Bank and NMC and the corresponding Environmental and Social Commitment Plan (the "NMC ESCP"). The Bank has agreed to provide financing for the Project, as set out in the Financing Agreement and the Grant Agreement.

2. The Borrower 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 Financing Agreement and the Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Financing Agreement and Grant Agreement.

3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower 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 Financing Agreement and Grant Agreement, the Borrower 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, 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's Representative specified in the Financing Agreement and Grant Agreement. 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.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	**ORGANIZATIONAL STRUCTURE** a. Establish and maintain a Project Implementing Team (PIT) with qualified staff and resources to support management of environmental, social, health and safety (ESHS) risks and impacts of Part 1 and Part 3 of the Project and stakeholder engagement including one E&S Specialist, and one Communications and Stakeholder Engagement Specialist (CSES). b. Coordinate with the NMC in managing the ESHS risks and impacts of Part 2 of the Project, including arrangements on exchange of data, consistent with this ESCP, the NMC ESCP, and the ESSs. c. Coordinate with relevant government agencies at both national and sub-national levels to implement Project stakeholder engagement activities and manage E&S risks and impacts of Part 1 of the Project. d. Amend existing agreements with Participating Financial Institutions ("PFIs") to manage E&S risks and impacts of Part 1.2 of the Project and ensure compliance with this ESCP. e. Ensure that any new agreement with PFIs complies with this ESCP. f. Require each PFI to designate a person in charge of managing ESHS risks and impacts as shall be established in the agreements between the Borrower and the PFIs, consistent with the ESSs and the ESMS.	a. Establish PIT which includes an E&S specialist and a CSES before the Effective Date. b. Throughout Project implementation. c. Throughout Project implementation. d. Prior to disbursement of funds for Project activities involving financing under Part 1.2 of the Project. e. Throughout Project implementation. f. Same timeframe as (d) for existing agreements and same timeframe as (e) for new agreement. .	For a and c, MLSA/PIT For b, d, e and f MLSA/PIT in coordination with NMC and PFIs.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	**CAPACITY BUILDING PLAN/MEASURES** Prepare and implement a capacity building plan (CBP) as part of Project Operational Manual (POM) and ESMS. The CBP will include: ▪ Training for MLSA staff assigned to the Project on ESMS, E&S risk screening procedures, sexual exploitation and abuse (SEA), sexual harassment (SH) prevention, Project stakeholder engagement plan (SEP), and the Project's Feedback and Grievance Redress Mechanisms (FGRM). ▪ Provide targeted training for PFIs' relevant staff on specific aspects of ESMS, E&S risk screening and Project FGRM. ▪ Capacity building training for Unified Social Services (USS) staff and 114 hotline staff on Project activities, beneficiary engagement, Government Housing Support Program (HSP) details, Project FGRM and appeal mechanisms. ▪ Outreach and training to local self-governmental bodies and Civil Society Organizations (CSOs) to support engagement with refugees and vulnerable households.	Adopt no later than 3 (three) months after the Effective Date and thereafter maintain throughout the implementation of the Project.	MLSA/PIT
MONITORING AND REPORTING			
C	**REGULAR REPORTING** Prepare and submit to the Bank regular monitoring reports on the ESHS performance of the Project. The reports shall include: ▪ Status of preparation and implementation of E&S measures required under the ESCP and ESMSs. ▪ The results of the E&S risk screening process applied by the PFIs. ▪ Summary of stakeholder engagement activities carried out as per the SEP. ▪ Complaints submitted to the FGRM, the grievance log, and progress made in resolving them. ▪ ESHS performance of PFIs as reported through monthly reports to MLSA. ▪ Number and status of resolution of incidents and accidents reported under action E below.	Submit quarterly ESHS monitoring reports to the Bank throughout Project implementation, commencing after the Effective Date. Submit semestral project progress reports to the Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the Bank nolater than 45 days after the end of each reporting period.	MLSA/PIT
D	**PFIs MONTHLY REPORTS** Require PFIs to provide monthly monitoring reports on ESHS performance and grievance management, as well as on any changes to PFIs' ESMS's function and adaptation and implementation of measures to address the gaps, as specified in Action 9.2, in accordance with		MLSA/PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	the E&S requirements specified in POM and MLSA's ESMS and this ESCP and submit such reports to the Bank.	Submit the monthly reports to the Bank as annexes to the reports to be submitted under Action C above.	
E	**INCIDENTS AND ACCIDENTS** a. 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 or biodiversity resources; pollution of the environment; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation and abuse, and sexual harassment (SEA/SH); or disease outbreaks. Provide available details of the incident or accident to the Bank upon request. b. 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 (CAP) that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.	a. Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request. b. Provide review report and CAP 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.	MLSA/PIT
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	**ENVIRONMENTAL AND SOCIAL ASSESSMENT** a. Finalize, redisclose and implement an E&S screening procedures, for Part 1 of the Project regarding activities involving housing financing, consistent with the relevant ESSs and the ESMS. b. Finalize and implement the Exclusion List as part of the E&S screening procedures; and do not grant financing for activities involving substantial or high E&S risks, including, *inter alia*: i) where no E&S screening was done; ii) that have adverse E&S risks and impacts on community health and safety that cannot be properly avoided, minimized or mitigated in accordance with ESS4; or iii) involve physical and/or economic displacement in accordance with ESS5; or iv) have adverse impacts on the environment, including natural habitats,	a. Finalize and re-disclose the E&S screening procedures before the Effective Date as part of ESMS and implement throughout Project implementation. b. Finalize the Exclusion List before the Effective Date and implement throughout Project implementation and as part of the process screening, selection, and monitoring of	MLSA/PIT MLSA/PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	critical habitats, ecologically sensitive areas, legally protected and/or internationally recognized areas of high biodiversity value as set out in ESS6; or v) cause significant risks and impacts to tangible and intangible cultural heritage as set out in ESS8; or vi) involve any other activities in the Exclusion List.	project activities. Relevant requirements included in each PFI agreement with the MLSA.	
1.2	**TECHNICAL ASSISTANCE** Carry out consultancy, studies, capacity building, training, and any other technical assistance activities under the Project, including national housing framework and roadmap and mid-term and end-term beneficiary satisfaction surveys, 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.	MLSA/PIT
1.3	**USE OF BORROWER ENVIRONMENTAL AND SOCIAL FRAMEWORK** a. Partially apply the Borrower's relevant policy, legal, and institutional framework (the "Borrower's E&S Framework") to the extent that it is consistent with the relevant ESSs, and ensure that the management of ESHS risks and impacts of the Project, specifically labor management and working conditions of Project workers, waste and Occupational Health and Safety (OHS) management measures, community health and safety, including SEA/SH, cultural heritage risks and impacts, Financial Intermediaries (Fis), and grievance redress mechanisms are consistent with the requirements of ESSs 2, 3, 4, 8, 9, 10 and this ESCP. Ensure the implementation of additional gap filing measures for each relevant ESS, consistent with the requirements of the ESSs and this ESCP. In case of any inconsistency between the requirements in the Borrower's E&S Framework and the ESSs, the requirements in the relevant ESSs shall prevail. b. Notify the Bank of: i) any change in the Borrower's E&S Framework that may have an impact on E&S risk management for the Project or materially adversely affect the Borrower's ability to manage the E&S risk of the Project in accordance with this ESCP, and; ii) the immediate measures taken or planned to be taken to address said changes. The ESCP shall be updated to reflect such agreed actions.	a. Throughout Project implementation. b. Same timeframe as Action E above.	MLSA/PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.4	**ACTIVITIES SUBJECT TO RETROACTIVE FINANCING** Carry out E&S due diligence for activities subject to retroactive financing to identify and ensure that the necessary actions are taken to address any gaps identified during the due diligence, and submit to the Bank a report demonstrating that measures to address any gaps, including the resolution of any grievances or disputes have been undertaken consistent with this ESCP and the ESSs.	As part of the submission of the request for retroactive financing and prior to disbursement of retroactive financing	MLSA/PIT
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	**LABOR MANAGEMENT** Ensure that Project workers are engaged in the implementation of the Project in accordance with the Borrower's Labor Code and consistent with ESS2. To this end, implement the following measures: a) Prepare and adopt code of conducts (CoCs) for all Project workers. The CoC shall cover, inter alia, prevention of SEA/SH, non-discrimination, and child/forced labor. b) Provide direct and contracted Project workers, as defined under ESS2, with information and documentation that is clear and understandable regarding their terms and conditions of employment through written contracts setting out their rights, including, inter alia, rights related to hours of work, wages, overtime, compensation, and benefits, as well as written notice of termination of employment, and details of severance payments, as applicable. c) Implement OHS measures, taking into account the General Environmental, Health and Safety Guidelines (EHSGs), the industry-specific EHSGs and other Good International Industry Practice (GIIP), as relevant, including as part of Action 2.2 below. d) Implement measures, as applicable, to, inter alia: (i) prevent the use of all forms of forced labor and child labor; (ii) enable workers to benefit from, inter alia, access to grievance mechanisms without fear of retaliation; and (iii) provide effective freedom to form and join workers organizations or alternative mechanisms for expressing their concerns and protect their rights related to labor and working conditions. e) Incorporate the relevant labor management procedures and measures in the E&S specifications of the MLSA's ESMS and the agreements between the Borrower and the PFIs. In case of any inconsistency between the Borrower's Labor Code and ESS2, the provisions in ESS2 shall prevail.	a) Prepare the CoCs prior to hiring or assigning any project workers and thereafter implement throughout Project implementation. b) Throughout project implementation. e) Incorporate into the MLSA's ESMS and the agreements within same timeframe as Actions 9.1 and 9.2 below and ensure compliance throughout Project implementation.	MLSA/PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	**OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN** a. Prepare and implement OHS provisions, to manage the OHS risks and impacts of Part 1.2 of the Project, as part of the ESMS. b. Require all PFIs to adopt and implement OHS management measures as part of their respective ESMSs, consistent with the Project's OHS requirements.	a. Same timeframe as Action 9.1.1 below for the preparation and implementation of the ESMS. b. Same timeframe as Action 9.2.1 below for the review and upgrade of the PFIs' ESMSs.	MLSA/PIT
2.3	**GRIEVANCE MECHANISM FOR PROJECT WORKERS** a. Establish and operate a grievance mechanism (GM) for Project workers, as part of the POM and consistent with ESS2. b. Cause and require PFIs to establish and implement GM consistent with this ESCP and the MLSA ESMS.	a. Establish GM prior engaging Project workers and thereafter maintain and operate it throughout Project implementation. b. Same timeframe as Action 9.2 below.	MLSA/PIT
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 MLSA's ESMS to assess, exclude and manage aspects related to hazardous and non-hazardous waste, consistent with E&S risk and impact screening and exclusion procedures, and in line with ESS3.	Same timeframe as Action 9.1.1 below for the preparation and implementation of the ESMS.	MLSA/PIT
3.2	**RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** Incorporate resource efficiency and pollution prevention and management measures in the MLSA's ESMS under action 9.1.1 below, as needed and consistent with ESSs.	Same timeframe as Action 9.1.1 below for the preparation and implementation of the ESMS.	MLSA/PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	**COMMUNITY HEALTH AND SAFETY** Assess and manage specific risks and impacts to the community arising from Project activities, including traffic and road safety, as part of the MLSA's ESMS under action 9.1.1 below, as needed and consistent with ESSs.	Same timeframe as Action 9.1.1 below for the preparation and implementation of the ESMS.	MLSA/PIT
4.2	**SEA AND SH RISKS** Prepare and implement SEA/SH preventive actions as part of the ESMS under action 9.1.1 below, as needed and consistent with ESSs.	Same timeframe as Action 9.1.1 below for the preparation and implementation of the ESMS.	MLSA/PIT
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	Screen all proposed Project activities in line with Action 1.1.1 above, consistent with the relevant aspects of ESS5, ESS9 and the MLSA's ESMS, and exclude activities that may involve land acquisition, physical or economic displacement, or restrictions on land use from the Project. Any such activities shall be deemed ineligible and excluded from financing.	Same timeframe as E&S Assessment under Action 1.1.1 above and Action 9.1.1 below for the preparation and implementation of the MLSA's ESMS.	MLSA/PIT
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	Screen all proposed Project activities in line with Action 1.1.1 above, consistent with the relevant aspects of ESS6, ESS9 and the MLSA's ESMS, and exclude activities likely to cause significant adverse impacts on natural or critical habitats, or on biodiversity, that cannot be avoided, minimized, restored, or offset in accordance with ESS6, from the Project. Any such activities shall be deemed ineligible and excluded from financing.	Same timeframe as E&S Assessment under Action 1.1.1 above and Action 9.1.1 below for the preparation and implementation of the MLSA's ESMS.	MLSA/PIT
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 Armenia.			
ESS 8: CULTURAL HERITAGE			
8.1	**CULTURAL HERITAGE RISKS AND IMPACTS**		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Incorporate cultural heritage screening and management procedures in the MLSA's ESMS, in a manner consistent with this ESCP and ESS8.	Same timeframe as Action9.1.1 for the preparation and implementation of the ESMS.	MLSA/PIT
8.2	**CHANCE FINDS** Describe and implement the chance finds procedures as part of MLSA's ESMS.	Same timeframe as Action 9.1.1 for the preparation and implementation ESMS.	MLSA/PIT
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	**ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM** a. Establish and adopt an ESMS, built on the E&S screening tool under Action 1.1, to identify, assess, manage, and monitor the E&S risks and impacts of activities related to the Part 1 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 ESMS through MLSA website and allow the Bank to do so on its website, including the Exclusion List. The content and scope of the 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 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; • 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 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. Prepare and adopt the ESMS and disclose summary of its elements before the Effective Date; maintain and implement ESMS throughout Project implementation.	MLSA/PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	• 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. Screen all proposed FI subprojects against the final Exclusion List included in the ESMS consistent with Action 1.1 above and the requirements of the relevant ESSs to exclude subprojects that cannot be financed under the Project. c. Require PFIs that participate in the Project to comply with i) the ESMS, ii) the Bank's ESSs, and iii) the relevant E&S national regulations, as detailed in MLSA's 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 MLSA's ESMS. MLSA's ESMS will include templates to guide the preparation of these E&S management tools and instruments. d. 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. e. In case of changes to the ESMS, adopt and implement the material measures in a manner acceptable to the Bank, and consistent with the ESSs, and this ESCP. Any remedial measures agreed with the Bank to address said changes shall be inserted in an updated ESCP.	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 MLSA and the PFIs, and monitor compliance throughout the implementation of FI subprojects, as relevant. d. Same timeframe as Action E above. e. Throughout Project implementation.	
9.2	FIs		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	a. Require eligible PFIs to establish and maintain the necessary organizational capacity and competency for implementing MLSA's ESMS consistent with the Bank's ESSs, with clearly defined roles and responsibilities in accordance with the provisions of Action 9.1 and Action A(d) above. 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 MLSA's 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 Part 1.2 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 MLSA and the PFIs. d. Require PFIs to promptly notify MLSA 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. e. 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 MLSA's ESMS, relevant ESSs, and this ESCP. Any remedial measures agreed with MLSA to address said changes shall be promptly shared with the Bank.	a. Same timeline as Action A(d) above. b. Review and upgrade the existing ESMSs of PFIs and disclose no later than 4 (four) months after the Effective Date. c. Ensure application of E&S risk screening procedures and mitigation measures throughout Project implementation, in line with the agreed timeline for the establishment or upgrading of the PFIs' ESMSs. d. Require PFIs to notify of any changes no later than 48 hours after learning of the changes. e. Adopt and implement the material measures within 3 (three) months after agreeing with the Bank on the specific nature of the measures.	MLSA/PIT, in coordination with PFIs
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	**STAKEHOLDER ENGAGEMENT PLAN**		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Update and implement a 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.	No later than 3 (three) months after the Effective Date and thereafter implement the SEP throughout Project implementation.	MLSA/PIT, in coordination with PFIs and NMC
10.2	**PROJECT FEEDBACK AND GRIEVANCE REDRESS MECHANISM** Update, publicize, maintain, and operate an FGRM for MLSA and each PFI, 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.	For MLSA's FGRM, prior to Effective Date and thereafter maintain and operate the mechanism throughout Project implementation. For existing PFIs, prior to disbursement of funds. For new PFIs, as part of the HSP Participation Agreement to be entered into force between MLSA and the PFI.	MLSA/PIT, in coordination with PFIs and NMC
INDICATORS FOR IMPLEMENTATION READINESS			
A: Organizational Structure B: Capacity building plan/measures: MLSA to prepare CBP 1.1.2: MLSA to establish and adopt an ESMS 2.1 MLSA to prepare CoCs for all Project workers 2.3 MLSA to establish and operate a GM for Project workers 10.2 MLSA to establish FGRM			