REPUBLIC OF GHANA

MINISTRY OF LOCAL GOVERNMENT, CHIEFTAINCY AND RELIGIOUS AFFAIRS

GULF OF GUINEA NORTHERN REGIONS SOCIAL COHESION (SOCO) PROJECT – FIRST ADDITIONAL FINANCING (P175043)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Negotiated

October 22, 2026

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1. The Republic of Ghana (the Recipient) is implementing the Gulf of Guinea Northern Region Social Cohesion Project (SOCO, P175043) (the Project), with the involvement of the Ministry of Local Government, Chieftaincy and Religious Affairs (MLGCRA), as set out in the Original Financing Agreement (Credit No. 7070-GH) and the Additional Financing Agreement (collectively, the Agreements). The International Development Association (the Association), provided the original financing for the Project, and the Association and the International Bank for Reconstruction and Development (together, the Bank), acting jointly as the administrator of the Africa Climate and People Single-Donor Trust Fund, has agreed to provide the additional financing for the Project, as set out in the Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the 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 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 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 Agreements, the 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 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 Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient's Representative specified in the Agreements. 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.

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	**ORGANIZATIONAL STRUCTURE** a. Maintain the Project Implementation Unit (PIU) established for the Project with qualified staff and resources to support management of environmental, social, health and safety risks and impacts of the Project including a Social Specialist, an Environmental Specialist, and a security focal person (and security consultants, when needed). b. Maintain the existing six region- and 48 district-level environmental and social focal points to support the PIU in the management of E&S risks at the local level.	a. Maintain the PIU and these positions throughout Project implementation. b. Maintain regional and district-level environmental and social focal persons throughout Project implementation.	a. MLGCRA PIU b. Metropolitan, Municipal and District Assemblies (MMDAs)
B	**CAPACITY BUILDING PLAN/MEASURES** Prepare and implement the following capacity building measures: • training for PIU staff, stakeholders, communities, Project workers on environmental and social management, community health and safety, grievance mechanism (GM), SEA/SH risk and management.	Prior to commencement of Project activities and throughout Project implementation	PIU
MONITORING AND REPORTING			
C	**REGULAR REPORTING** Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include: • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan (SEP). • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below.	Submit quarterly reports to the Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than 5 days after the end of each reporting period.	PIU

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	• Implementation of the security risk assessment / security risk management plan.		
D	**CONTRACTORS' MONTHLY REPORTS** Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank.	Submit the monthly reports to the Bank upon request.	PIU
E	**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 or biodiversity resources; pollution of the environment; dam failure; 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 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.	PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	**ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS** 1. Adopt the Environmental and Social Management Framework for the project, consistent with the relevant ESSs 2. Require subproject contractor to prepare and implement the site-specific Environmental and Social Management Plan (ESMP), as set out in the updated ESMF. The proposed subprojects or activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project. 3. Develop and update the Project Implementation Manual (PIM) and an updated Security Management Plan (SMP).	1.Adopt the ESMF and thereafter implement throughout Project implementation. 2. Prepare the ESMP and incorporate the ESMP as part of the bidding documents for the respective subproject prior to carrying out the subproject activity that requires the preparation of such ESMP. Once finalized, implement the respective ESMP throughout Project implementation. 3. Before effectiveness of the AF	PIU

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	**MANAGEMENT OF CONTRACTORS** Incorporate the relevant aspects of the updated ESCP, including, inter alia, the relevant E&S assessments or plans, the existing 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 and C-ESMPs. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Bank.	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.	PIU MMDA
1.3	**TECHNICAL ASSISTANCE** Carry out the consultancy, studies (including feasibility studies, if applicable), 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.	When required, throughout Project implementation.	PIU
1.4	**CONTINGENT EMERGENCY RESPONSE FINANCING** 1. Prepare CERC Manual with description of the E&S assessment and management arrangement and Emergency Action Plan, including CERC activation procedures and a positive list for investments as an annex to the Project ESMF under 1.1 (1) above. 2. Implement the E&S provisions of the CERC Manual and the CERC ESMF annex in accordance with the ESSs and the provisions of this ESCP.	1. The preparation of the CERC Manual and Emergency Action Plan in form and substance acceptable to the Association is a withdrawal condition under Section III-B of Schedule 2 to the Financing Agreement 2. In accordance with the timeframe specified in the CERC Manual and any assessment and plan required therein	PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	**LABOR MANAGEMENT PROCEDURES** Adopt and implement the Labor Management Procedures (LMP) prepared for the parent Project.	The LMP already prepared for the parent Project shall be adopted and implemented throughout Project implementation.	PIU MMDA
2.2	**OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN** Require contractors and subcontractors to prepare and implement OHS Management Measures or Plans in accordance with ESMPs	Prepare the OHS Management Measures or Plans prior to commencement of work and thereafter implement the	PIU MMDA

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		Measures or Plans throughout Project implementation.	
2.3	**GRIEVANCE MECHANISM FOR PROJECT WORKERS** Maintain and operate the existing grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Maintain and operate the GM throughout the Project implementation.	PIU MMDA
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	**WASTE MANAGEMENT PLAN** Adopt and implement a Waste Management Plan (WMP), as part of the ESMPs in line with the parent Project ESMF, to manage hazardous and non-hazardous waste, consistent with ESS3.	Same timeframe as for the preparation and implementation of ESMPs under action 1.1(2) above.	PIU
3.2	**RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** Incorporate resource efficiency and pollution prevention and management measures in the ESMPs to be prepared under action 1.1.2 above.	Same timeframe as for the preparation and implementation of ESMPs as required under action 1.1.(2) above.	PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	**TRAFFIC AND ROAD SAFETY** Incorporate measures to manage traffic and road safety risks as required in the ESMPs to be prepared under action 1.1.2 above.	Same timeframe as for the preparation and implementation of ESMPs as required under action 1.1.(2) above.	PIU
4.2	**COMMUNITY HEALTH AND SAFETY** Assess and manage specific risks and impacts to the community arising from Project activities including, inter alia, SEA/SH risks, Security risks, risks of labor influx, etc. and include mitigation measures in the ESMPs to be prepared in accordance with the updated ESMF.	Same timeframe as for the preparation and implementation of ESMPs as required under action 1.1.(2) above.	PIU MMDA
4.3	**SEA AND SH RISKS** Update and implement the GBV Action Plan of the parent Project to assess and manage the risks of SEA and SH.	Update the GBV Action Plan no later than 3 months after the Effective Date of the AF and thereafter implement the SEA/SH Action Plan throughout Project implementation.	PIU

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.4	**SECURITY MANAGEMENT** Update security risk assessment and security management plan and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities where such measures are reflected, as needed, e.g. as set out in the ESMP or Security Management Plan.	Before effectiveness of the AF activities and throughout project implementation.	PIU MMDA
4.5	**SECURITY PERSONNEL** Where use of security personnel would be required/ anticipated, the Recipient shall prepare, adopt, and implement the security management plan (SMP), based on the Security Risk Assessment (SRA) in accordance with the requirements of ESS 4, in a manner acceptable to the Bank. The following measures shall be adopted to ensure that the engagement of security personnel for provision of security of Project workers, sites and / or assets, is carried out in accordance with ESS 4: a. Assess the risks and impacts of engaging security personnel, and implement measures to manage these risks and impacts, (including through a stand-alone security management plan), guided by the principles of proportionality and good international industry practices, and by applicable law, with regard to the recruitment, rules of conduct, training, equipping and monitoring of such security personnel; b. Adopt and apply standards, protocols and codes of conduct for the selection and use of security personnel, and screen such personnel to verify that they have not engaged in illegal or abusive behavior in the past, including SEA / SH or excessive use of force; c. Ensure that such personnel is properly instructed and trained, prior to deployment and on a regular basis, on the use of force and proper conduct, as outlined in the Project Implementation Manual, ESMF, and Security Risk Management Plan. d. Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include a communication strategy on the involvement of security personnel in the Project; e. Ensure that any concerns or grievances regarding the conduct of security personnel are received, monitored, documented (considering the need to protect confidentiality), resolved through the Project grievance mechanism (see action 10.2 below) and reported to the Bank no later than two (2) days after being received; and f. When the Bank so requires, after consultation with the Recipient: (i) promptly appoint a third-party monitoring consultant, whose terms of reference, qualifications and experience are satisfactory to the Bank, in order to visit and monitor the Project area where security personnel are deployed, collect relevant data and communicate with Project stakeholders and beneficiaries; (ii) request the third-party consultant in charge of monitoring to prepare and submit monitoring reports, which shall be	Before start of AF activities/ before deployment of security personnel and throughout project implementation.	PIU

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	quickly made available to the Bank and discussed with it; and (iii) promptly take any action requested by the Bank after examining the reports of the monitoring third party consultant		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	**RESETTLEMENT FRAMEWORK AND PLANS** 1. Adopt and implement the Resettlement Framework (RF) for the parent Project, in accordance with ESS 5. 2. Prepare and implement relevant Resettlement Plan (RP) or a Livelihood Restoration Plan (LRP) for each activity under the Project for which such RP or LRP is required, as set out in the RPF and consistent with ESS5.	1. Implement the Parent Project RPF throughout Project implementation. 2. Prepare and implement the respective RP or LRP prior to carrying out the relevant work, including ensuring that before taking possession of the land and related assets, full compensation has been provided, and as applicable displaced people have been resettled and moving allowances have been provided.	PIU MMDA
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	**BIODIVERSITY RISKS AND IMPACTS** The Project's ESMF and site specific ESMPs shall include measures and actions to identify, assess and manage risks and impacts on biodiversity, including the identification of different habitat types and the determination of the circumstances in which compensation could be used, which shall be implemented in accordance with ESS6.	Same timeframe as for the preparation and implementation of the ESMF and ESMPs under action 1.1 (2) above.	PIU MMDA
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
ESS 8: CULTURAL HERITAGE			
8.1	**CULTURAL HERITAGE RISKS AND IMPACTS** Adopt and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMPs, in accordance with the guidelines of the ESMF prepared for the Project, and consistent with ESS8.	Same timeframe as for the preparation and implementation of ESMPs under action 1.1.(2) above.	PIU MMDA
8.2	**CHANCE FINDS** Adopt and implement the chance find procedures, specified in the updated ESMF as part of the ESMPs to be prepared under action 1.1.(2) above.	Same timeframe as for the preparation and implementation of ESMPs under action 1.1.(2) above.	PIU MMDA
ESS 9: FINANCIAL INTERMEDIARIES			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.1	**STAKEHOLDER ENGAGEMENT PLAN** Update and implement the Stakeholder Engagement Plan (SEP) for the parent Project, consistent with ESS10, which should 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.	Implement the Updated SEP which was disclosed on 27th August 2026. and thereafter implement the updated SEP throughout Project implementation.	PIU
10.2	**PROJECT GRIEVANCE MECHANISM** Maintain, publicize, and operate an accessible grievance mechanism, which has been established under the parent project 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.	Maintain and operate the mechanism throughout Project implementation.	PIU
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: Action 1.1 Action 4.3 Action 4.4 Action 10.1			

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