The Kingdom of Eswatini

Eswatini Digital (P508948)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Draft for Appraisal

July 30 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Kingdom of Eswatini (the Borrower) will implement the Eswatini Digital Project (the Project), with the involvement of the Ministry of Information, Communication and Technology (MICT) and Eswatini Post and Telecommunications Corporation, as set out in the Financing Agreement (the Agreement). The International Bank for Reconstruction and Development/International Development Association (the Bank) has agreed to provide financing for the Project, as set out in 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 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 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 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 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 Unit (PIU) with qualified staff and resources to support management of environmental, social, health and safety (ESHS) risks and impacts of the Project including an Environmental and social (E&S) specialist.	Establish a PIU and hire an E&S Specialist no later than 60 days after the effective date of the Project and thereafter maintain the PIU and these positions throughout Project implementation.	MICT
B	**CAPACITY BUILDING MEASURES** Prepare and implement the following capacity building measures: • training for PIU staff, stakeholders, communities, Project workers on environmental, health and safety requirements and risks associated with the project activities, management of electronic waste, stakeholder mapping and engagement and community health and safety.	Prior to commencing with implementation of the construction activities and thereafter throughout project implementation	MICT/ 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. • 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 monthly 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 10 days after the end of each reporting period.	PIU
D	**CONTRACTORS' MONTHLY REPORTS**	Submit the monthly reports to the Bank upon request.	PIU

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	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.		
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; 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.	PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	**ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS** Prepare and implement an Environmental and Social Management Plan (ESMP) for the Project, consistent with the relevant national legislative requirements and ESSs.	Prepare the ESMP and incorporate the ESMP as part of the respective bidding documents for the respective Project activity prior to the carrying out of Project activity that requires the preparation of such ESMP. Once finalized, implement the respective ESMP throughout Project implementation.	PIU
1.2	**MANAGEMENT OF CONTRACTORS** Incorporate the relevant aspects of the ESCP, including, inter alia, ESMP, the Labor Management Procedures, code of conduct and energy efficiency considerations, 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.	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

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	**TECHNICAL ASSISTANCE** Carry out the consultancies, 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.	Throughout Project implementation.	PIU
1.4	**USE OF BORROWER'S ENVIRONMENTAL AND SOCIAL FRAMEWORK** 1.Partial use of Borrower Environmental and Social Framework *Action*: Ensure that the E&S risks and impact of the Project, are managed in accordance with this ESCP and the Borrower E&S Framework regarding implementation of the requirements set forth in the issuance of the Environmental Compliance certificate and authorization letter. 2. Promptly notify the Bank of any changes to the Borrower's E&S Framework that may materially adversely affect the Borrower's ability to manage the E&S risks and impacts of the Project in line with the ESSs and the immediate measures taken or that are planned to be taken to address said changes and the ensuing potential risks and impacts of the Project. If, in the opinion of the Bank, such changes adversely affect relevant ESHS risk management aspects of the Project, the Borrower shall agree to implement measures and actions to address them in a manner acceptable to the Bank. The ESCP shall be updated to reflect such agreed actions	1. Throughout the Project implementation. 2. Notify the Bank immediately after taking notice of the change to the Borrower's E&S Framework. Subsequent actions, if requested by the Bank, shall be reflected in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP.	PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	**LABOR MANAGEMENT PROCEDURES** Prepare and implement the Labor Management Procedures (LMP) for the Project.	1. Prepare the LMP within three (3) months after Effectiveness, and thereafter implement the LMP throughout Project implementation.	PIU and EPTC
2.2	**OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN** 1. Prepare a baseline risk assessment and incorporate relevant OHS mitigation measures as part of the ESMP to assess and manage the OHS risks and impacts of the Project. 2. Require contractors and subcontractors to implement the OHS measures set out in the ESMP.	1. Same timeframe for the preparation and implementation of the ESMP in action 1.1 2. Prior to commencing with the Project Activities.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.3	**GRIEVANCE MECHANISM FOR PROJECT WORKERS** Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	PIU and EPTC
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	**WASTE MANAGEMENT PLAN** Incorporate measures to manage general construction waste and electronic waste consistent with ESS, in the ESMP to be prepared under action 1.1 above.	Same timeframe for the preparation and implementation of the ESMP in action 1.1	PIU
3.2	**RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above.	Same timeframe for the preparation and implementation of the ESMP in action 1.1	PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	**TRAFFIC AND ROAD SAFETY** Incorporate measures to manage traffic safety risks as required in the ESMP to be prepared under action 1.1 above.	Same timeframe for the preparation and implementation of the ESMP in action 1.1	PIU
4.2	**COMMUNITY HEALTH AND SAFETY** Assess and manage specific risks and impacts to the community arising from Project activities including, inter alia, working near communities, open trenches and exposure to electronic waste, among other, and include mitigation measures in the ESMPs to be prepared under action 1.1 above.	Same timeframe for the preparation and implementation of the ESMP in action 1.1	PIU
4.3	**SEA AND SH RISKS** Prepare and implement a SEA/SH Action Plan, as part of the LMP, to assess and manage the risks of SEA and SH.	Same timeline as under Section 2.1 above.	
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	Not applicable		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	Not applicable		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not applicable		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 8: CULTURAL HERITAGE			
8.2	**CHANCE FINDS** Describe and implement the chance finds procedures, as part of the ESMP of the Project.	Same timeframe as stipulated in action 1.1 and thereafter, implement the procedures throughout Project implementation.	PIU
ESS 9: FINANCIAL INTERMEDIARIES			
	Not applicable		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	**STAKEHOLDER ENGAGEMENT PLAN** Implement a Stakeholder Engagement Plan, prepared by Appraisal and disclosed on August 15, 2025 (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.	Implement throughout Project implementation.	PIU and EPTC
10.2	**PROJECT GRIEVANCE MECHANISM** 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.	Maintain and operate the mechanism throughout Project implementation.	PIU and EPTC
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: Action A: Establish and maintain a Project Implementing Unit (PIU) with qualified staff and resources to support management of environmental, social, health and safety (ESHS) risks and impacts of the Project including an Environmental and social (E&S) specialist. Action 1.1: Prepare and implement an Environmental and Social Management Plan (ESMP) for the Project, consistent with the relevant national legislative requirements and ESSs.			