

SYRIAN ARAB REPUBLIC

Central Bank of Syria (CBS)

Syria Financial Sector Modernization

Project (FSMP)

(P517399)

**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

Negotiated Version

July 8, 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Syrian Arab Republic (the Recipient) shall implement the proposed Syria Financial Sector Modernization Project - FSMP, (P517399) (the Project) with the involvement of the Central Bank of Syria (CBS), as set out in the Financing Agreement (the Agreement). The International Development Association (the Association) has agreed to provide Financing for the Project, as set out in the Agreement.
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 Association. 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 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 Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP shall 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 Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative specified in the Agreement. 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.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT¹			
A	ORGANIZATIONAL STRUCTURE a) Establish and maintain a Project Implementation Unit (PIU), with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including an Environmental and Social Focal Point.	a) Establish a PIU, and hire or appoint the Environmental and Social Focal Point before Project Effective Date and thereafter maintain the PIU and this position throughout Project implementation.	Central Bank of Syria (CBS)
B	CAPACITY BUILDING PLAN/MEASURES Prepare and implement the following capacity building measures: 1. Introduction to the World Bank Environmental and Social Framework (ESF) and Environmental and Social Standards (ESSs), to build foundational understanding of ESF principles and compliance requirements. 2. Stakeholder Engagement to strengthen capacity to engage stakeholders, including vulnerable groups, and implement the SEP. In addition to grievance mechanism (GM) to ensure effective intake, resolution, and documentation of grievances, including SEA/SH and labor-related complaints. 3. Occupational and Community Health and Safety (OHS/CHS) to CBS staff and contractors to ensure safe working conditions during fit-out and minor refurbishment works and IT installations in CBS-designated spaces for installation of IT equipment and associated infrastructure 4. Others as identified during implementation and as the need arises. All training materials shall be developed in Arabic and English and delivered through a mix of in-person workshops, virtual sessions, and self-paced modules.	1 and 2 will be delivered within three (3) months after the Effective Date; a refresher in Year 2. 3. Prior to commencing the fit-out and minor refurbishment works and IT installations.	CBS
MONITORING AND REPORTING			
C	REGULAR REPORTING		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project in accordance with the requirements of this ESCP and other E&S instruments. The reports shall include, at minimum: • Status of preparation and implementation of E&S instruments required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanisms, the grievance log, and progress made in resolving them, including SEA/SH complaints. • E&S performance of contractors and consultants • Number and status of resolution of incidents and accidents reported under action E below. • Labor and working conditions management aspects and workers grievances.	Submit quarterly reports to the Association for the first year and semi-annually afterwards and throughout implementation, commencing after the Effective Date. Submit each report to the Association no later than 15 days after the end of each reporting period.	CBS
D	CONTRACTORS' MONTHLY REPORTS Require the contractors and supervision firms (if hired) 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 Association.	Submit the monthly reports to the Association upon request	
E	INCIDENTS AND ACCIDENTS 1. Notify the Association 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 Association upon request. 2. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, 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.	1. Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.	CBS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		2. Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice to the Association, unless a different timeframe is agreed to in writing by the Association.	
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS Incorporate Employer E&S requirements and mitigation measures in contractor's contracts to manage site-specific E&S risks and impacts, including, inter alia, environmentally sound e-waste collection, temporary storage, disposal of obsolete IT equipment and recycling protocols through authorized channels.	During preparation of bidding documents. Thereafter implement the site-specific mitigation measures throughout project implementation.	
1.2	MANAGEMENT OF CONTRACTORS a) Incorporate the relevant aspects of the Labor Management Procedures, code of conduct, occupational and community health & safety, energy efficiency, waste management, and take-back arrangements for electrical and electronic equipment at end-of-life, 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. b) Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.	a) As part of the preparation of bidding documents and respective contracts. Supervise contractors throughout Project implementation. b) Copies of relevant contracts to be provided to the Association upon request.	CBS
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 Association that are consistent with the relevant ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.	Throughout Project implementation.	CBS
1.4	CONTINGENT EMERGENCY RESPONSE FINANCING 1. Ensure that the CERC Manual and the Emergency Action Plan, both acceptable to the Association, as specified the legal agreement include a description of the E&S assessment and	1. The preparation of the CERC Manual and the Emergency Action 1. Plan, in form and substance	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	management arrangements for the implementation of the CERC activities in accordance with the ESSs. 2. Implement the E&S provisions of the CERC Manual and the Emergency Action Plan.	acceptable to the Association, is a withdrawal condition under Section III.B.1(b) of Schedule 2 of the Agreement. 2. In accordance with the timeframes specified in the CERC Manual.	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Ensure that Project workers are engaged in the implementation of the Project in accordance with ESS2. To this end, implement the following measures: a) Provide Project workers 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; b) Implement occupational health and safety (including personal protective equipment, and emergency preparedness and response) 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; c) 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; d) Develop a code of conduct for workers, which shall include measures to prevent and respond to sexual exploitation and abuse, and sexual harassment (SEA/SH) cases; e) Incorporate the relevant requirements above in the E&S specifications of the procurement documents and contracts with third parties that engage [identify type of Project workers] in the implementation of the Project; f) Sample of contracts addressing the above shall be provided to the Association upon request; and g) Provide training and capacity-building activities to relevant staff to strengthen their ability to effectively implement and enforce labor standards.	Throughout Project implementation.	CBS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, consistent with ESS2.	Establish Labor Grievance Mechanism (LGM) prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	CBS
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT a) For Goods contracts, include in the bidding documents energy efficiency specifications for IT equipment and rated criteria that promote Extended Producer Responsibility to take-back electrical and electronic equipment at their end-of-life for safe disposal as E-waste. b) For Works contracts, obligate contractors, through contractual clauses, to use environmentally safe renovation material, and safely dispose of construction and demolition wastes. c) Include in the Project Operations Manual (POM) procedures for the handling, temporary storage, and disposal of obsolete IT equipment through authorized channels, in accordance with ESS3.	(a) and (b): Same time as preparation of the bidding documents for relevant project activities. (c) During preparation of the Project Operation Manual POM and thereafter implement the measures throughout Project implementation.	CBS
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY a) Assess and manage any specific risks and impacts to the community arising from Project activities (e.g. fit-out and minor refurbishment works and IT installations), including, inter alia, behavior of Project workers, response to emergency situations, digital safety, inclusive engagement, etc. Include mitigation measures in the POM, consistent with ESS4 requirements. b) Obligate contractors and supervising firms, through contractual clauses, to comply with community health and safety protocols as specified in the POM.	a) During preparation of the Project Operation Manual (POM). b) Same time as preparation of the bidding documents for relevant project activities. Thereafter, implement the CHS measures throughout Project implementation.	CBS
4.2	SEA AND SH RISKS		CBS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Assess and manage risks of Sexual Exploitation, Abuse, and Harassment (SEA/SH), including safe spaces and confidential reporting mechanisms.	Throughout Project implementation.	
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Update and implement a proportionate 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.	The SEP was disclosed on June 28, 2026. Update and disclose the updated SEP no later than 30 days after the Effective Date and thereafter implement it throughout Project implementation.	CBS
10.2	PROJECT GRIEVANCE MECHANISM 1. Operate, publicize, and maintain an accessible grievance mechanism (the existing GM in CBS), 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. 2. 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. 3. Adopt and implement GM Standard Operating Procedures (SOPs) covering GBV complaints that shall be developed and implemented and adopted, including enhancement to the existing GM. 4. Assess the existing GM and suggest the required further enhancements.	1. Operate and maintain the mechanism throughout Project implementation. 2. Operate and maintain the mechanism throughout Project implementation. 3. SOPs prepared and adopted no later than 60 days after the Effective Date and implement them throughout project implementation. 4. GM enhanced within years (1) and (2) after the Effective Date and maintained throughout Project implementation.	CBS
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: - Assigning E&S focal point from CBS as required under Action A. - Training for the E&S Focal Point and relevant staff on ESF, stakeholder engagement and grievance mechanism, social inclusion and gender, occupational health and safety, as indicated in Action B - Operationalization of the workers' GM as per Action 2.2 - Operationalization of project GM as per Action 10.2.			