BANCO NACIONAL DE COMERCIO EXTERIOR, S.N.C., I.B.D.

Mexico Access to Finance for Inclusive Development Project (P515503)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Draft

November 11, 2026

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Environmental and Social Commitment Plan

1. BANCO NACIONAL DE COMERCIO EXTERIOR, S.N.C., I.B.D. -BANCOMEXT- (the Borrower or BANCOMEXT) will implement the Mexico Access to Finance for Inclusive Development Project (the Project), as set forth in the Loan Agreement (the Agreement). The International Bank for Reconstruction and Development (the Bank) has agreed to provide financing for the Project, as established in the Agreement.

2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESS) and this ESCP, in a manner acceptable to the Bank. The ESCP is an integral part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used herein shall 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 Borrower shall carry out or cause to be carried out, including, as applicable, their respective timelines; institutional and staffing arrangements; capacity building, monitoring and reporting requirements; and grievance management mechanisms. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted upon, disclosed, and implemented under the Project, in accordance with the ESSs and in a form and substance acceptable to the Bank. Said E&S documents may be reviewed from time to time with prior written agreement by the Bank. As established in the aforementioned Agreements, the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.

4. As agreed between the Bank and the Borrower, this ESCP will be reviewed from time to time, as 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 signed correspondence between the Bank and Bancomext’s authorized representative specified in the Agreement. The Borrower shall promptly disclose the updated ESCP.

5. The subsection on "Implementation Readiness Indicators" below identifies the actions and measures that will be monitored to assess the Project's readiness to commence implementation in accordance with this ESCP. However, all actions and measures set out in this ESCP shall be implemented as established in the "Timeline" column below, regardless of whether they are listed in the aforementioned subsection.

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MATERIAL MEASURES AND ACTIONS		TIMELINE	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY BUILDING			
A	**ORGANIZATIONAL STRUCTURE** a. Maintain within BANCOMEXT an organizational structure within the Environmental and Social Unit (Unidad de Gestion Ambiental y Social – UGAS in Spanish –) with qualified staff and resources to support the management of the Project's environmental, social, health, and safety risks and impacts, through BANCOMEXT's Environmental and Social Risk Management System (*Sistema de Gestión de Riesgos Ambientales y Sociales*, or SARAS). Such structure shall include, at a minimum the SubManager of the UGAS, three (3) Environmental and Social (E&S) Specialists and one E&S consultant (1) associated to the proposed Project. b. BANCOMEXT shall inform the Bank of any relevant changes to the organizational structure responsible for E&S matters. c. Should the scenario described in the preceding paragraph occur, the proposed structure shall be reinforced with specialized staff, as agreed between the Borrower and the Bank, for the duration of this Project.	a. Throughout Project implementation. b. Within 30 days of the change of any relevant staff member. c. Throughout Project implementation.	BANCOMEXT

	MATERIAL MEASURES AND ACTIONS	TIMELINE	RESPONSIBLE ENTITY
B	**CAPACITY BUILDING PLAN/MEASURES** Develop and implement an environmental and social training plan acceptable to the Bank, including a schedule, adequate budget, objectives, and indicators, among others, to provide periodic training to BANCOMEXT's environmental and social staff, focal points, and other relevant parties on the E&S risk management procedures established under BANCOMEXT's SARAS and this ESCP, ensuring the institutional capacity required for the effective environmental and social implementation of the Project. The plan shall include, among other topics, the following: • BANCOMEXT's SARAS • Integrated waste management, including hazardous and non-hazardous waste • Occupational health and safety • Worker and community health and safety • Cultural heritage risk management • Emergency response plan • Prevention and mitigation of gender-based violence (GBV) risks • Stakeholder mapping and engagement • Grievance management	The detailed plan shall be submitted to the Bank no later than one hundred and eighty (180) days after the Effective Date. Training sessions shall be delivered during Project implementation, in accordance with the agreed schedule set out in the plan. Any revision or update to the plan shall be submitted to the Bank within the timeframe agreed with the Bank.	BANCOMEXT

MONITORING AND REPORTING			
C	**PERIODIC REPORTS** a. Prepare and submit to the Bank periodic monitoring reports on the Project's E&S performance, as part of the Project performance reports. In particular, the reports shall include: • Prepare and submit to the Bank periodic monitoring reports on the Project's E&S performance, as part of the Project performance reports. The reports shall include: • Implementation status of BANCOMEXT's SARAS with respect to credits extended under the Project. • Implementation status of this ESCP. • Summary of the Eligible Sub-Loans financed through the Project, and the overall portfolio risk, profiled by sector in accordance. • Description of material measures taken to ensure that the management of environmental and social risks of Eligible Sub-Loans is conducted in a manner consistent with this ESCP. • • Summary of stakeholder engagement activities carried out by Eligible Beneficiaries (when applicable). • Complaints received through the grievance mechanism(s), the grievance log, and progress on their resolution. • Number and resolution status of incidents and accidents reported pursuant to Action E below. • E&S performance of companies participating in first-tier lending, including the management of E&S risks of their financed activities/subprojects and compliance with applicable national/local legislation. b. The content of the Progress Report will be further detailed in the Project's Operation Manual (POM).	a. Submit semi-annual reports to the Bank throughout Project implementation, beginning after the Effective Date. Each report shall be submitted to the Bank no later than forty-five (45) days after the end of each reporting period. E&S due diligence reporting requirements and incident notification requirements shall be incorporated into the agreements between BANCOMEXT and Eligible Beneficiaries. b. Reporting requirements shall be incorporated into the agreements between BANCOMEXT and Eligible Beneficiaries.	BANCOMEXT
D	**DUE DILIGENCE** a. Sub-loans: All activities financed under the credit line, regardless of amount or E&S category, shall receive BANCOMEXT's Equator Principles due diligence treatment in BANCOMEXT's SARAS. In the event of gaps between the SARAS and the applicable requirements of the ESF, the UGAS shall prepare an action plan in accordance with its current procedures.	a./b./c./d./e Throughout Project implementation.	BANCOMEXT

	b. Submit to the Bank: i) for the Bank's non-objection, an Eligibility and Risk Classification Report; ii) a Monitoring Report, and iii) a Completion Report, providing evidence of compliance with the requirements for management of E&S risk and impacts of each Eligible Sub-Loan, as established in the applicable legislation, BANCOMEXT's E&S assessment (per the SARAS procedures and regulations), and this ESCP. The content of each report and the type of evidence to be provided will be further defined in the POM, in a manner acceptable to the Bank. c. The Exclusion List agreed with the Bank shall be applied to all activities under the credit line. d. BANCOMEXT shall facilitate the Bank's implementation support, which may include visits to selected Eligible Beneficiaries receiving loans, or documentary reviews of the due diligence conducted on the PFI. The frequency and scope of supervision visits and reviews shall be proportionate to the identified and reported environmental and social risks of the credits. e. Greenfield construction Sub-Loans. For Sub-Loans financing the construction of new facilities on previously undeveloped sites, BANCOMEXT shall, before approval, verify that the SARAS due diligence covers the relevant ESS requirements, including site screening against the Exclusion List and the ESS 5, ESS 6 and ESS8 requirements, and the E&S risks of construction. Where it does not, BANCOMEXT shall require the Eligible Beneficiaries to obtain the permits required by national law and to implement supplementary E&S measures, proportionate to the risks identified in the Eligibility and Risk Classification Report. These measures shall be set out in the POM, in a manner acceptable to the Bank, and monitored and reported under Action D., item b.		
E	**INCIDENTS AND ACCIDENTS** Notify the Bank of any Project-related incident or accident that has had, or is likely to have, a significant adverse effect on the environment, affected communities, the public, or workers, including those resulting in the death or serious injury of workers or members of the public; acts of violence, discrimination, or protest; unforeseen impacts on cultural heritage or biodiversity resources; environmental contamination; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation and abuse (SEA) or sexual harassment (SH); or disease outbreaks. This obligation applies to incidents or accidents occurring in activities implemented directly by the Borrower under the Project and by companies receiving financing from BANCOMEXT; BANCOMEXT shall: • Provide the Bank with available details of the incident or accident upon request, including, where applicable, information provided by the Eligible Beneficiaries, or final beneficiary; • Arrange directly, or through Eligible Beneficiaries, an appropriate review of the incident or accident to determine its root, immediate, and underlying causes;	Notify the Bank no later than 48 hours after becoming aware of the incident or accident.	BANCOMEXT

	• Prepare, agree with the Bank, and implement a corrective action plan establishing the measures necessary to address the incident or accident and prevent its recurrence, including, where applicable, actions to be taken by Eligible Beneficiary, or final beneficiary; • Submit to the Bank the review report and corrective action plan no later than 10 days after submission of the initial notification, unless a different timeframe is agreed in writing with the Bank. • Require, through the sub-loan agreements and the POM, that Eligible Beneficiaries notify BANCOMEXT of any incident or accident described in this Action E no later than [48] hours after becoming aware of it, so that BANCOMEXT can notify the Bank within the 48-hour period established below. The notification shall include, to the extent available, the nature, date and location of the incident, the persons or communities affected, and the immediate measures taken.		
ESS1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	**ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM** Maintain and implement BANCOMEXT's existing SARAS to identify, assess, manage, and monitor the environmental and social risks and impacts of Eligible Beneficiaries and FI activities receiving Project support, consistent with ESS1 and ESS9.	Throughout Project implementation.	BANCOMEXT
1.2	**ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT** a. Apply and enforce the principles and guidelines established in BANCOMEXT's Environmental, Social, and Climate Responsibility Policy as a condition for financing any FI activity. b. Carry out environmental and social risk management in accordance with the existing procedures under BANCOMEXT's SARAS and in accordance with the Due Diligence (Action D) above. c. Incorporate specific contractual clauses into first-tier sub-loan agreements establishing the environmental and social obligations applicable to sub-borrowers under the credit line. The POM will include an indicative list of E&S contractual clauses, as well specific sections for the department of warehouses.	a/b/c. Throughout Project implementation and as part of the process of executing sub-loan agreements.	BANCOMEXT
1.3	**SARAS DOCUMENTATION** Maintain disclosure on BANCOMEXT's website of the key elements of its SARAS, including the environmental and social policy and the Project SARAS summary.	Throughout Project implementation.	BANCOMEXT
1.4	**EXCLUSION LIST** The Exclusion List agreed with the Bank shall be applied to all activities under the credit line.	a/b. Throughout Project implementation.	BANCOMEXT

	For first-tier sub-loans: Screen all proposed financial intermediation activities against the Exclusion List agreed for the Project, is detailed in the Summary of the SARAS of the Project and subsequently included in the POM of the Project.		
1.5	**MANAGEMENT OF CONTRACTORS AND SUPPLIERS BY ELIGIBLE BENEFICIARIES** Cause through as contractual E&S clauses, the obligations that Eligible Beneficiaries have in place procedures for monitoring the social and environmental practices of contractors and suppliers- in accordance with BANCOMEXT's SARAS requirements for contractor and supplier management.	Throughout Project implementation, according to the timeframe set in Actions C (above).	BANCOMEXT
1.6	**ASSOCIATED FACILITIES** a. Identify any associated facilities of the Eligible Sub-Loans as part of the screening and assessment process, including the level of influence and control the Eligible Beneficiaries have over the associated facility, and report to the Bank accordingly. b. In cases where the Eligible Beneficiaries have control or influence over the associated facilities, as evidenced according to a) above, cause the Eligible Beneficiaries to comply with the applicable legislation with regard to E&S aspects, BANCOMEXT's SARAS and any other additional requirements as determined by this ESCP. The POM will reflect the content and format of the corresponding identification including the definition and characteristics of the associated facilities examples under the ESF, which will be part of the Eligibility and Risk Classification Report (Action D a above).	Throughout Project implementation.	BANCOMEXT
1.7	**ELIGIBLE SUB-LOANS SUBJECT TO RETROACTIVE FINANCING** Submit to the Bank a report providing evidence that a) the Eligible Beneficiary has taken appropriate measures to address the E&S risks identified by the Environmental and Social Impact Assessment of their Eligible Sub-Loan, avoiding or mitigating harms to the environment and society as required under the country legislation, BANCOMEXT's SARAS requirements and b) these activities subject to retroactive financing comply with the Project Specific Exclusion List and c) there are no issues in non-compliance with the requirements of this ESCP.	As part of the submission of the request for retroactive financing.	BANCOMEXT
ESS 2: LABOR AND WORKING CONDITIONS			

2.1	**LABOR MANAGEMENT PROCEDURES** a. Maintain, as part of the SARAS and in accordance with BANCOMEXT's human resources policies on Equal Employment and Non-Discrimination and Gender, as well as applicable requirements under ESS2, labor requirements for the Project. Such requirements shall include, among other aspects: provisions on working conditions; labor relations management; occupational health and safety (including the use of personal protective equipment and emergency preparedness and response); a code of conduct (including provisions on Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH); the prohibition of forced labor and child labor; and a grievance mechanism for Project workers. b. Do not offer financial support to Eligible Beneficiaries convicted, either in the administrative or judicial sphere, for acts involving racial and gender discrimination, child labor, forced labor, and SEA/SH. Provide evidence through the reports mentioned in measures C (above) that the Eligible Beneficiaries have in place a) procedures to promote the health and safety of workers, including the prevention of the occurrence and severity of occupational accidents and b) formalized guidelines and procedures to combat discriminatory practices (related to race, gender, sexual orientation, disability, origin and religion) and SEA/SH. Incident notification and response shall follow Action E, and grievances shall be handled through the mechanisms under Actions 2.2 and 10.4.	a/b. Throughout Project implementation.	BANCOMEXT
2.2	**GRIEVANCE MECHANISM FOR PROJECT WORKERS** a. Continue operating a grievance mechanism for BANCOMEXT's workers, in accordance with ESS2. b. Provide evidence through the reports mentioned in measures C that the Eligible Beneficiaries have in place a permanent and accessible complaint mechanism that makes it possible to receive complaints from employees and outsourced workers.	a./b. Throughout Project implementation	BANCOMEXT
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	**WASTE MANAGEMENT** Waste management aspects under this Standard shall be addressed as part of the implementation of BANCOMEXT's SARAS, in accordance with applicable provisions under ESS3 and ESS9.	Same timeline as for the implementation of BANCOMEXT's SARAS, throughout Project implementation.	BANCOMEXT

3.2	**RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** Resource efficiency and pollution prevention aspects under this Standard shall be addressed as part of the implementation of BANCOMEXT's SARAS, and the E&S management of Eligible Beneficiaries, in accordance with applicable provisions under ESS3 and ESS9.	Same timeline as for the implementation of BANCOMEXT's SARAS, throughout Project implementation.	BANCOMEXT
3.3	**MANAGEMENT OF PESTICIDES** a. Management of Pesticides aspects under this Standard shall be addressed as part of the implementation of BANCOMEXT's SARAS, and the E&S management of Eligible Beneficiaries, in accordance with applicable provisions under ESS3 and ESS9. b. Eligible Beneficiaries must not use: (i) pesticides, products, or formulations that do not comply with national legislation; (ii) products containing active ingredients restricted under applicable international conventions or protocols; or (iii) formulated products classified as carcinogenic, mutagenic, or toxic to reproduction under national legislation.	a./b. Same timeline as for the implementation of BANCOMEXT's SARAS, throughout Project implementation.	BANCOMEXT
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	**TRAFFIC AND ROAD SAFETY** Road and traffic safety aspects under this Standard shall be addressed as part of the implementation of BANCOMEXT's SARAS, and the E&S management of Eligible Beneficiaries, in accordance with applicable provisions under ESS4.	Same timeline as for the implementation of BANCOMEXT's SARAS and, throughout Project implementation.	BANCOMEXT
4.2	**COMMUNITY HEALTH AND SAFETY** Community health and safety aspects under this Standard shall be addressed as part of the implementation of BANCOMEXT's SARAS, and the E&S management of Eligible Beneficiaries, in accordance with applicable provisions under ESS4 and ESS9.	Same timeline as for the implementation of BANCOMEXT's SARAS and the Environmental and Social Management System of PFIs the E&S management of Eligible Beneficiaries as applicable, throughout Project implementation.	BANCOMEXT
4.3	**SEXUAL EXPLOITATION AND ABUSE, AND SEXUAL HARASSMENT RISKS** a. Maintain prevention and response measures addressing SEA/SH/GBV risks at the level of BANCOMEXT and participating Eligible Beneficiaries, as set out in BANCOMEXT's SARAS, and the E&S management of Eligible Beneficiaries. b. Require, through the sub-loan agreements and the POM that Eligible Beneficiaries (a) implement a code of conduct with SEA/SH provisions covering workers and contractors; (b) implement a confidential SEA/SH channel for workers and community members with referral information (FEVIMTRA, 800-911-2000); (c) set a notification deadline that allows BANCOMEXT to meet the 48-hour requirement in Action E.	Same timeline as for the implementation of BANCOMEXT's SARAS, and throughout Project implementation.	BANCOMEXT

4.4	**SECURITY PERSONNEL OVERSIGHT** Security Personnel Oversight aspects under this Standard shall be addressed as part of the implementation of BANCOMEXT's SARAS, and the E&S management of Eligible Beneficiaries, in accordance with applicable provisions under ESS4 and ESS9.	Same timeline as for the implementation of BANCOMEXT's SARAS and throughout Project implementation.	BANCOMEXT
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE, AND INVOLUNTARY RESETTLEMENT			
5.1	**LAND ACQUISITION PROCEDURES** Provide evidence through the Reports mentioned in measures C that Eligible Beneficiaries whose proposed Sub-Loans required land acquisition have not led to involuntary resettlement, involving physical or economic displacement; unresolved ownership, legacy displacement, or involved forced eviction, in connection with the Sub-Loan implementation.	Same timeline as for the implementation of BANCOMEXT's SARAS, and throughout Project implementation.	BANCOMEXT
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

6.1	**BIODIVERSITY IMPACTS AND RISKS** a. Relevant aspects of this Standard shall be considered and implemented as part of the implementation of BANCOMEXT's SARAS, and the E&S management of Eligible Beneficiaries, in accordance with applicable provisions under ESS6. For such purposes, the agreed Exclusion List shall be applied to delineate activities that will not be eligible for financing due to their potential to generate significant adverse impacts in relation to ESS6. In particular, the following activities are excluded: those that may result in the loss, conversion, or degradation of natural, critical, or protected habitats, or that otherwise generate significant adverse impacts on biodiversity, including the destruction of critical habitats; illegal wildlife trade under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES); forestry operations that do not have sustainable management plans approved by the competent authority; and commercial fishing using large-scale drift nets. b. For activities that may result in the loss, conversion, or degradation of modified habitats, the mitigation hierarchy shall be applied in accordance with ESS6.	a./b. Same timeline as for the preparation and implementation of BANCOMEXT's SARAS and the E&S management of Eligible Beneficiaries as applicable, throughout the entire implementation of the Project.	BANCOMEXT
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	**PROCEDURES TO AVOID, MINIMIZE, MITIGATE, OR COMPENSATE ADVERSE IMPACTS ON INDIGENOUS PEOPLES** a. Apply the Exclusion List and verify its application, which prohibits financing Sub-Loans and/or activities that may have adverse impacts on lands and natural resources subject to traditional ownership or under customary use or occupation by Indigenous Peoples; that may cause the unjustified relocation or resettlement of Indigenous Peoples from lands or natural resources subject to traditional ownership or under customary use or occupation; or that may have significant impacts on the cultural heritage of Indigenous Peoples, where this is material to the identity and/or the cultural, ceremonial, or spiritual aspects of the lives of the affected Indigenous Peoples. b. Based on the Due Diligence conducted by BANCOMEXT in accordance with section D above, ensure that Eligible Beneficiaries maintain adequate requirements for the culturally appropriate treatment of Indigenous Peoples in accordance with ESS7. The MOP will detail the criteria used by BANCOMEXT'S SARAS to identify impacts affecting indigenous peoples, including: (a) the geographic proximity threshold or criterion (distance, administrative unit, or national-registered boundary) that triggers enhanced indigenous screening; (b) the types of impacts that qualify as "affecting" for the purposes of Sub-Loans and project exclusion; and (c) the documentation standard as required by national legislation and BANCOMEXT's SARAS.	a./b. Throughout Project implementation.	BANCOMEXT
ESS 8: CULTURAL HERITAGE			

8.1	**CULTURAL HERITAGE RISKS AND IMPACTS** Relevant aspects of this Standard shall be addressed as part of the implementation of BANCOMEXT's SARAS, and the E&S management of Eligible Beneficiaries, in accordance with applicable provisions under ESS9 and ESS8. BANCOMEXT shall ensure that the financing agreements for all investment sub-loans involving construction or excavation include a chance finds clause requiring the Eligible Beneficiary to: (a) immediately suspend works in the affected area upon discovery of previously unknown archaeological remains or cultural heritage; (b) notify BANCOMEXT and the Instituto Nacional de Antropología e Historia (INAH) within 72 hours of the discovery; and (c) not resume works in the affected area llllluntil INAH has issued its determination. BANCOMEXT shall include this requirement in the POM and in the model financing agreement for sub-loans, and shall report any chance find in accordance with Action E. The chance finds clause shall be included in the financing agreements of all applicable Sub-Loans.	Same timeline as for the implementation of BANCOMEXT's SARAS and the E&S management of Eligible Beneficiaries as applicable, throughout Project implementation.	BANCOMEXT

ESS 9: FINANCIAL INTERMEDIARIES			
9.1	**ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEMS (ESMS)** a. For first-tier Sub-Loans, maintain and implement BANCOMEXT's SARAS consistent with the applicable requirements of ESS9, addressing any gaps identified between the existing system and ESS9 requirements through agreed measures. The SARAS shall follow the procedure in accordance with section D above, as well as procedures for the supervision of the E& aspects of the Project. The SARAS includes, among others, the following elements: • An environmental and social policy approved by BANCOMEXT's senior management. • Clearly defined procedures for the identification, assessment, and management of environmental and social risks and impacts Eligible Beneficiaries through the PFIs' Environmental and Social Management Systems. • An Exclusion List of activities that are not eligible for financing under the Project. • Organizational capacity and competencies to implement the SARAS, with clearly defined roles and responsibilities. • Monitoring and reporting of the Project's environmental and social performance. • Procedures for the notification of incidents and accidents and the corresponding reporting requirements. • An external communications mechanism operated by the UNE (Unidad Especializada de Atención Usuarios), including measures to respond in a timely manner to public inquiries and concerns. b. Environmental and Social Management System Documentation: For first-tier Sub-Loans maintain the key elements of the existing BANCOMEXT's SARAS and UNE (E&S policy, risk screening, assessment and monitoring procedures, external communication channels, and organizational structure) disclosed on BANCOMEXT's website. c. Promptly notify the Bank of relevant changes to the BANCOMEXT's SARAS that may materially adversely affect the Borrower's capacity to screen, identify, classify and monitor Sub-Loans' environmental and social risks, as well as in the national environmental, social and labor regulatory framework to manage environmental and social risks and impacts of Eligible Sub-Loans. If necessary, agree with the Bank on measures to be taken to address said changes and to be inserted in an updated ESCP to ensure Eligible Sub-Loans' environmental and social risks are managed in a manner consistent with the relevant ESSs. The ESCP shall be updated, if needed, to reflect such relevant changes. Where required, establish an action plan for alignment with BANCOMEXT's SARAS and UNE the applicable requirements of ESS9.	a. Same timeframe as action 1.1 above. The SARAS will be implemented throughout Project implementation. b. BANCOMEXT will require that PFIs have an Environmental and Social Management System and that the Eligible Beneficiaries adopt E&S management measures as applicable and defined in the Project's Operations Manual, or are in the process of implementing an Action Plan in accordance with BANCOMEXT's SARAS and the applicable requirements of ESS9, before they participate in the Project, and maintain it throughout Project implementation.	BANCOMEXT

ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	**FI'S INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT** a. Publicly disclose and maintain throughout implementation, a Project-level E&S risk summary report, which will include, at minimum, the description of the Project, key environmental and social risks and impacts of the anticipated Eligible Sub-Loans and associated mitigation and management measures. BANCOMEXT shall maintain its existing channel for receiving and responding to interactions from stakeholders. b. Publicly and timely advertise through its external communications mechanisms relevant information on the Project and the Eligible Sub-Loans. The Project's relevant information, its format and content will be further defined in the POM.	a./b. Throughout Project Implementation.	BANCOMEXT
10.2	**PROJECT GRIEVANCE REDRESS MECHANISM** a. Maintain an accessible grievance redress mechanism (GRM) with clearly defined information on grievance reception channels and responsibilities, to receive concerns, complaints, and grievances related to the Project, and to facilitate their resolution in a timely, effective, transparent, culturally appropriate, and easily accessible manner for all parties affected by the Project, free of charge and without reprisals, which shall allow for the anonymous submission of concerns, complaints, and grievances, in accordance with applicable provisions under ESS10, BANCOMEXT's Environmental and Social Policy, and the SARAS. b. BANCOMEXT's GRM shall be available to all Project participants.	a. Throughout Project implementation. b. Prior to participation in the credit line.	BANCOMEXT
10.3	**ELIGIBLE BENEFICIARIES' INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT** a. Provide evidence through the reports mentioned in measures C that the Eligible Beneficiaries have in place communication channels for periodic disclosure of information related to the socio-environmental risks and impacts related to their activities to the external public. The disclosed documentation might include relevant E&S assessments, management plans and programs, monitoring reports, as required by BANCOMEXT's SARAS and the relevant national legislation, as aplicable. b. Provide evidence through the reports mentioned in measures C that the Eligible Beneficiaries – whose Eligible Sub-Loans are Category B – carry out dialogue activities with affected communities or surrounding communities (ensuring access to information in an objective, transparent, clear manner and in easily understandable language, taking the necessary measures to guarantee content accessibility for people with disabilities), as provided for in the BANCOMEXT's SARAS and the relevant national legislation as aplicable.	Throughout Project implementation, according to the timeframe set in Actions C.	BANCOMEXT

10.4	**ELIGIBLE BENEFICIARIES' GRIEVANCE MECHANISM** Provide evidence through the reports mentioned in measures C) that the sub-loans have in place an accessible complaint mechanism that makes it possible to receive complaints from all external stakeholders and obtain resolutions, as required by BANCOMEXT's SARAS and the relevant national legislation. The POM will include specific GRM considerations.	Throughout Project implementation, according to the timeframe set in Actions C.	BANCOMEXT

INDICATORS FOR IMPLEMENTATION READINESS

The following actions are indicators for implementation readiness:

i) A: Organizational Structure
ii)B: Capacity Strengthening Plan
iii) 1.1 Environmental and Social Management System (SARAS)
iv) 1.4 Exclusion List
v) 10.2 Grievance management system with clearly defined information on grievance reception channels and responsibilities, within ninety (90) days