

**THE KINGDOM OF LESOTHO**  
**Accelerating Sustainable and Clean Energy Access**  
**Transformation (ASCENT)**

**(P513939)**

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

**April 23, 2026**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Kingdom of Lesotho (the Recipient through the Ministry of Energy (MoE) will implement the Accelerating Sustainable and Clean Energy Transformation in Lesotho, with the involvement of the Ministry of Energy 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 World Bank 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 referred 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 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 will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Minister of the MoE. 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
<b>IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT</b>			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Maintain the existing project implementation unit (PIU) within the DOE for the Lesotho Renewable Energy and Energy Access Project (LREEAP-P166936) with qualified staff and resources to support management of environmental, social, health and safety (E&amp;S) risks and impacts of the Project including a qualified Social Specialist, and an Environmental Specialist with Occupational Health and Safety Skills.</p>	<p>Maintain the LREEAP PIU as set out in the Financing Agreement throughout Project implementation.</p> <p>Recruit and maintain the Social Specialist, and an Environmental Specialist with Health and Safety Skills throughout Project implementation.</p>	MoE/DoE
B	<p><b>CAPACITY SUPPORT</b></p> <p>Design and implement training for PIU to improve awareness of risks and mitigate the impacts of the project, focusing on the key ESF requirements of the project, as relevant.</p>	Throughout the implementation of the project	MoE /DoE
<b>MONITORING AND REPORTING</b>			
C	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&amp;S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> <li>• Status of preparation, updating, and implementation of E&amp;S instruments required under the ESCP.</li> <li>• Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan.</li> <li>• Grievances/Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them.</li> <li>• E&amp;S performance of contractors and subcontractors as reported through monthly contractors and supervision firms' reports.</li> </ul>	<p>Submit quarterly reports to the Association throughout Project implementation commencing after the Effectiveness Date.</p> <p>Submit each report to the Association no later than 45 days after the end of each reporting period.</p>	MoE/DoE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> <li>Findings on ESHS compliance inspections and audits including status of corrective actions relevant to contractor compliance with requirements in ESMP.</li> <li>Number and status of resolution of incidents and accidents reported under action E.</li> </ul>		
D	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly monitoring reports on E&amp;S performance in accordance with the metrics specified in the respective E&amp;S documents as stipulated in the bidding documents and contracts and submit such reports to the Association.</p>	Submit the monthly reports to the Association as annexes to the quarterly E&S reports to be submitted under action C above.	MoE/DoE
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>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.</p> <p>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.</p>	<p>Notify the Association no later than 48 hours after learning about the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed in writing by the Association.</p>	MoE/DoE
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b>		MoE/DoE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ol style="list-style-type: none"> <li>1. Prepare, disclose and implement site specific Environmental and Social Management Plan (ESMP), consistent with the relevant ESSs, for off-grid solutions once the specific project activities and locations have been defined and confirmed.</li> <li>2. Prepare, disclose and implement an Environmental and Social Management Framework (ESMF) for the Project.</li> <li>3. Update Project Implementation Manual (PIM) prepared under LRREAP to align with ESF and relevant ESSs and include the screening of sub-project activities and E&amp;S implementation arrangements in line with the requirements to be set out in the updated ESMF</li> </ol>	<ol style="list-style-type: none"> <li>1. Prepare the ESMPs 90 days after effectiveness date and prior to commencing with preparation of the bidding documents. Thereafter implementation throughout Project implementation.</li> <li>2. Within 1 month of effectiveness, and thereafter implement the ESMF throughout Project implementation.</li> <li>3. Update PIM within 3 Months if project approval and thereafter implement throughout project implementation; provided that an interim PIM in place.</li> </ol>	
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, ESMPs, the Labor Management Procedures, and Code of Conduct, into the E&amp;S specifications of the procurement of 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&amp;S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation.</p> <p>Provide Copies of relevant contracts to the Association upon request.</p>	<b>MoE/DoE</b>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	<p><b>CONTINGENT EMERGENCY RESPONSE FINANCING</b></p> <p>1. Ensure that the CERC Manual as specified the legal agreement includes a description of the E&amp;S assessment and management arrangements, including, if applicable, insert name of any CERC-ESMF/ESMF Addendum that will be included or referred to in the CERC Manual for the implementation of CERC component, in accordance with the ESSs.</p> <p>2. Implement the E&amp;S provisions of the CERC Manual including, if applicable, the CERC-ESMF/ESMF Addendum, and any assessments and plans required therein.</p>	<p>1. The preparation of the CERC Manual and, if applicable, other E&amp;S documents, as relevant, in form and substance acceptable to the Association is a withdrawal condition under Section III.B.1(d)(ii) of Schedule 2 of the Financing Agreement.</p> <p>2. In accordance with the timeframes specified in the CERC Manual including, if applicable, the CERC-ESMF/ESMF Addendum, and any assessments and plans required therein.</p>	MoE/DoE
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Prepare, adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), Code of Conduct (including relating to SEA and SH), forced labor, child labor, grievance management arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Same timeline as the ESMP, and prior to commencement of civil works. Thereafter, implement the LMP throughout Project implementation.	MoE/DoE
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b></p> <p>Prepare, adopt and implement an OHS Management Plan as part of the ESMP under action 1.1 (1) in line with the requirements of ESS2, and World Bank Group Environmental, Health and Safety Guidelines, to assess and manage the OHS risks and impacts of the Project.</p> <p>Require contractors and subcontractors to prepare and implement OHS Management Measures or Plan in accordance with the project OHS Management Plan.</p>	Same timeline as the ESMP, and prior to commencement of civil works. Thereafter, implement the OHS plan throughout Project implementation.	MoE/DoE
2.3	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p>		MoE/DoE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>WASTE MANAGEMENT PLAN</b> Prepare and implement a Waste Management Procedure (WMP), as part of the site specific ESMPs prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Prepare the WMP prior to commencing with the bidding process and thereafter implement the WMP throughout Project implementation.	MoE/DoE
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMP.	MoE/DoE
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>TRAFFIC AND ROAD SAFETY</b> Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMP.	MoE/DoE
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> Develop and implement Community Health and Safety Plan.	Same timeframe as for the preparation and implementation of the ESMPs.	MoE/DoE
4.3	<b>EMERGENCY PREPAREDNESS AND RESPONSE</b> Incorporate Emergency Preparedness and Response Procedures (EPRP)  Require contractors to include emergency preparedness and response procedures as part of the Contractors OHS plans	Same timeframe as for the preparation and implementation of the ESMPs, prior to bidding process and commencement of civil works and thereafter implement throughout project implementation.	MoE/DoE
4.3	<b>Sexual Exploitation and Abuse (SEA) AND Sexual Harassment (SH) RISKS</b>		MoE/DoE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Prepare and implement an SEA/SH Action Plan as part of the ESMP and LMP to assess and manage the risks of SEA and SH.	Same timeframe as for the adoption and implementation of the ESMP under 1.1 and thereafter implement the SEA/SH Action Plan throughout Project implementation.	
4.4	<b>SECURITY, THEFT, VANDALISM RISK MANAGEMENT</b>  Assess, prevent, and manage risks related to security incidents, theft, and vandalism affecting project workers, sites, assets, and activities. This shall include identifying risk hotspots, implementing proportionate mitigation measures, and applying monitoring and reporting protocols. All measures shall be implemented in accordance with the provisions outlined in the Environmental and Social Management Plan (ESMP) and, where applicable, the Security Management Plan (SMP) or any other relevant project specific instrument	Same timeframe as for the preparation and implementation of the ESMPs.  Risk assessment completed prior to commencement of civil works or deployment of assets.  Security, theft, and vandalism mitigation measures implemented throughout Project implementation.	<b>MoE/DoE</b>
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>RESETTLEMENT PLAN</b>  Prepare and implement a Resettlement Action Plan (RAP) for each activity under the Project where such RAP may be required, consistent with ESS5.	Prepare and implement the RAP prior to commencement of civil works, including ensuring that before taking possession of the land and related assets, full compensation has been provided.	<b>MoE/DoE</b>
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES .</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b>  If applicable, develop and implement mitigation measures to minimize impacts on biodiversity as part of the site specific ESMPs consistent with ESS6.	Same timeframe as for the preparation and implementation of the ESMPs.	<b>MoE/DoE</b>
<b>ESS 7: INDEGINOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
	N/A		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CULTURAL HERITAGE RISKS AND IMPACTS</b>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Prepare and implement a Cultural Heritage Management Plan (CHMP), as part of the ESMP consistent with ESS8.	Same timeframe as for the preparation and implementation of the ESMP, and thereafter implement the CHMP throughout Project implementation.	MoE/DoE
8.2	<b>CHANCE FINDS</b> Describe and implement the Chance Finds Procedures in the ESMP of the Project.	Same timeframe as for the preparation and implementation of the ESMP and thereafter implement the Chance Finds Procedures throughout Project implementation.	MoE/DoE
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	N/A		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN</b> A Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, has been prepared and disclosed on March 27, 2026. The SEP shall be implemented and updated as required throughout Project implementation, and includes 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 and update the SEP throughout Project implementation.	MoE/DoE
10.2	<b>PROJECT GRIEVANCE MECHANISM</b>  The existing grievance mechanism established under LREEAP shall be updated, publicized, maintained, and operated 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.	Update the grievance mechanism at the same timeframe as for the preparation and implementation of the ESMP and thereafter maintain and operate the mechanism throughout Project implementation.	MoE/DoE

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<b>INDICATORS FOR IMPLEMENTATION READINESS</b>		
<p>The following actions are indicators for implementation readiness:</p> <ul style="list-style-type: none"> <li>• Labour Management Procedures.</li> <li>• Worker GRM and Codes of Conduct in place prior to mobilization.</li> <li>• SEA/SH Action Plan – Prepare, disclosed and implemented in line with preparation of the ESMPs.</li> <li>• Environmental and Social Management Framework</li> <li>• Site-specific Environmental and Social Management Plans</li> <li>• Community Health and Safety Plan – Prepared prior to commencing construction works.</li> <li>• All project EHS requirements will be integrated into the bidding documents prior to the launch of the bid.</li> <li>• Update the project implementation manual prepared under LREEAP.</li> </ul>		