

**Update on  
the Implementation of the Action Plan  
presented in the Management Response to the Request for Inspection  
of the  
Republic of Cameroon: Lom Pangar Hydropower Project (P114077)**

April 23, 2019



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## I. INTRODUCTION

1. In its [Addendum](#) to the [Management Response](#) to the [Request for Inspection Panel Review](#) of the Republic of Cameroon: Lom Pangar Hydropower Project (P114077) ( “the Addendum”), submitted to the Panel on March 13, 2018, Bank Management committed to providing, within one year, detailed feedback on the implementation of the Action Plan presented in the Management Response. This report provides that feedback.

2. The Request for Inspection Panel Review (“the Request”) was submitted in 2017 by two former workers of the Project who alleged harm from unpaid overtime work; indecent working conditions; unpaid social security dues and thus inability to benefit from the social security system; dismissal of workers who contracted Hepatitis B; and abandonment of workers who suffered industrial accidents on the site. The Requesters alleged they had suffered harm and argued that contractual agreements between the Borrower and the Contractor were violated. The Management Response presented a review of worker complaints and concerns that arose in the course of the Project, which included some that were similar to those in the Request, and described the remedial measures taken by the Borrower and the Contractor directly as well as those that were facilitated by the Bank’s Grievance Redress Service (GRS). Management recognized, however “*that some of the improvements introduced by the Contractor may not have benefitted workers who had left the worksite before such improvements were implemented*” and proposed the Action Plan to address their situation. The Inspection Panel considered the Action Plan in reaching its recommendation not to investigate the Project.

3. As initially outlined in paragraphs 64 to 66 of the Management Response, the Action Plan agreed with the Borrower consisted of the following:

- (i) *That the Borrower will ensure that the existing Project-level [Grievance Redress Mechanism (GRM)] continues to receive and process any current Project-related as well as retrospective complaints. In this regard, the Project-level GRM will be extended to review and address the grievances of current and former Project workers; and the availability of the Project-level GRM to receive these and other grievances will be widely publicized.*
- (ii) *That the Bank will support the Borrower in efforts to identify current or former workers who may have work-related grievances that they wish to have reviewed and addressed, including, but not limited to, complaints related to alleged dismissal of workers with Hepatitis B infections and alleged abandonment of workers that suffered accidents on the work site. The Borrower has committed to working with the Contractor on identifying workers based on a review of personnel files, Hepatitis B screening results, and accident logs, as well as through an outreach campaign to solicit information about such grievances. The Bank will monitor the Borrower’s follow-up on those grievances.*

*Management is working closely with the Borrower to confirm details as to how workers’ grievances were addressed throughout Project implementation and to understand and address any grievances that may remain outstanding.*

*Management is continuing to provide and, where necessary, further strengthen supervision and implementation support until completion of the Project and support the Borrower with regard to compliance with the Project's environmental and social requirements.*

4. The Addendum provided updates on the Action Plan with respect to status, anticipated timeline for completion, and funding sources for the proposed measures. By June 2017, construction of the Bank-funded infrastructure was complete, and the Project entered a two-year Defect Liability Period for the Contractor. The Project's closing date was subsequently extended to June 28, 2019 in response to a request from the Government of Cameroon (GoC) to allow more time to monitor completion of contractual obligations, complete delivery of Local Development Plan facilities, and supervise demobilization and related safeguards requirements.

## II. STATUS OF THE PROJECT

5. ***Status of the Project.*** The Project development objective is to increase hydropower generation capacity, reduce seasonal variability of water flow in the Sanaga River and increase access to electricity. The Project, located in a very remote rural area of Cameroon, contributes to more stable provision of electricity to half the population of Cameroon, which is connected to the grid but suffers from seasonal electricity shortages, and enables new access to electricity in a remote rural area of the country. Since being commissioned, the Lom Pangar regulating dam on the Sanaga River has increased the guaranteed all-season hydropower capacity on the river by approximately 40 percent, adding 120MW to the power generation of existing downstream hydropower plants that can now generate more electricity in the dry season.

6. ***The Project is financed through an IDA Credit of US\$132 million and is co-financed*** with the African Development Bank, the European Investment Bank, the French Development Agency (AFD), the Central African States Development Bank, and the Borrower.

7. ***Construction of the Bank-supported infrastructure is complete.*** The Project is 97 percent disbursed, is scheduled to close on June 28, 2019 and is currently in advanced demobilization phase. Workers have been demobilizing since June 2017 and most have left the Project site. A small team has remained to secure and maintain the site. As Bank financing is almost fully disbursed (97 percent), and Project objectives have been met, the Bank intends to allow the project to close on its scheduled date of June 28, 2019. By that time, all cases that are still pending with the GRM, including any that have been identified as part of the Action Plan, are expected to be addressed. As per the Project design and agreement, the AFD will continue to supervise the implementation of the components that it is financing up to September 2020, including ensuring that the GRM is maintained.

8. ***As required by the Project's Environmental and Social Management Plan (ESMP), a Project-level GRM was set up at the inception of the Project in December 2012 and has been maintained during Project implementation.*** The GRM, established by the Project implementing agency, Electricity Development Corporation (EDC), includes four offices around the Project location to receive citizen complaints regarding the Project and to engage with the local community. The offices are staffed by local employees.

9. ***In addition to the Project-level GRM, a Social Dialogue Committee (SDC) was established by EDC in December 2012 consistent with national law and to specifically address several issues raised by workers on the construction site, particularly regarding the working conditions of the local employees.*** The SDC was made up of workers, union representatives, Contractor's representatives, and officials from local units of relevant Government agencies such the Ministry of Labor. The last meeting of the SDC was in July 2016, as at that stage most of the workers had demobilized, although key members of the Committee remain available to date within the Ministry of Labour, EDC and the Contractor. Most of the Action Plan agreed in the Management Response was related to expanding the scope and mandate of the GRM to fill the gap left by the closure of the SDC.

### III. THE ACTION PLAN IN DETAIL

10. ***Grievance Redress Mechanism.*** The MAP actions related to the GRM consisted of the following.

- The Bank would continue closely supervising the safeguard instruments on which the Action Plan relied with frequent supervision missions, attendance at consultations, and regular follow up meetings with EDC and the GRM team in Yaoundé.
- The Borrower would take steps to extend the scope and staffing of the GRM to review and address the grievances of current and former Project workers (the Project-level GRM had originally been established to address only grievances of Project-affected people, whereas the SDC handled complaints and concerns from the workforce).
- The extension of scope and staffing were to be accomplished by the end of March 2018.
- The Borrower would review and address any complaints received through the GRM, including meeting and consulting with complainants, as appropriate, to facilitate resolution.
- The Borrower would report regularly to the Bank team on complaints received and complaints resolved.
- China Water and Electricity (CWE), the Contractor, would be responsible for sharing documentation related to complaints and paying any additional compensation required.
- The Borrower would undertake a communication campaign to proactively reach out to current and future Project workers to inform them of the opportunities provided through the extended GRM.
- Plans for the outreach campaign were to be finalized by April 30, 2018, and the campaign was to commence by June 2018.

11. ***Implementation Support.*** The Bank recruited a specialized local consultant experienced in Quality Hygiene, Security, and Environment (QHSE) issues, with experience in organizational management and good knowledge of Cameroonian labor law to support the Borrower in designing the extension of the GRM and the methodology for the outreach campaign. In addition, the consultant was to:

- Review and comment on SDC decisions and all aspects related to their retroactive applicability;
- Review demobilization records of workers;
- Review specific worker cases upon the Bank's request, including but not limited to health and safety concerns; and
- Oversee the Borrower's efforts to extend the GRM to address work-related complaints.

The consultant was to submit, within one month of recruitment: a report on SDC decisions and demobilization of workers; analysis/report on worker demobilization on a case-by-case basis; and comments on the design of mechanisms to extend the existing GRM and of the outreach campaign.

12. ***E&S Panel of Experts and Independent E&S Auditor.*** The contracts for the Environmental and Social (E&S) Panel of Experts and ATESI, the independent auditing firm, were to be extended until 2021, with financing supported by the AFD.

13. ***Expected Timeline for Completion of the Action Plan.*** Completion of the consultant's due diligence by the end of April 2018 would enable the Borrower to: (i) engage with identified victims on their claims; (ii) follow up on the 67 workers identified as positive for Hepatitis B; and (ii) start the outreach campaign to reach former workers in the most effective manner. Management was confident that outreach and resolution of cases could be completed prior to Project closure, and it would be able to update the Panel on the status of the implementation of the Action Plan in March 2019.

14. ***Funding Sources and Contract Performance Incentives***

- As per the Project agreements, the GRM needed to remain operational and fully funded by the Borrower until Project closure. The staff and logistics needed for the GRM including the outreach program were to be funded by the Borrower using Project funds. After the Bank Project closure, the AFD would remain involved in the Project up to 2021 and would also ensure that a GRM is maintained.
- The contracts for the E&S Panel of Experts and ATESI were financed by AFD.
- The Bank QHSE consultant to support the Borrower was financed under Bank supervision budget for the Project.
- The need for additional compensation that could arise from the analysis of individual cases and outreach to former workers was to be borne by CWE as per its obligations as employer. Once agreed and finalized with the worker, the final settlement would need to be paid by CWE. If CWE failed to comply, the Borrower could declare a non-conformity of CWE to its contract obligations. The defect liability period of the construction contract will end in June 2019. In order to receive its full and final payment under the contract, CWE will need to have addressed all non-conformities. Should it fail to do so, the Borrower can enforce two mechanisms: (i) withhold the final payment until all compensation is paid in full to the identified complainants or (ii) make the payment on behalf of CWE and then withhold the corresponding amount from the final payment.



15. **Government Support for the Action Plan.** The GoC confirmed its strong commitment to resolving the issues raised in the Request as soon as possible and prior to Project closure (June 28, 2019) and supported the implementation of the Action Plan. Positive responses were received from the Ministry of Economy, Planning and Regional Development and from EDC, with a commitment to mobilize adequate financial and human resources for the quick resolution of any pending cases, prior to Project closure on June 28, 2019. The Director General of EDC (DG-EDC) solidified the corporation's commitment by issuing Decision No. 052/2018/EDC/DGD/DEP on May 29, 2018, "Concerning the Creation, Organization and Functions of a Technical Committee Charged with the Supervision and Implementation of Activities Related to the Management of Complaints and the Prevention of Conflicts in the Frame of the Lom Pangar Hydroelectric Project." The decision, discussed in more detail in Section III, specified that the Technical Committee would be chaired by the DG-EDC and consist of a Supervision Commission, also to be chaired by the DG-EDC, and a *Bureau de Résolution des Grievs* (BRG), i.e., the actual GRM.

#### IV. ACTION PLAN IMPLEMENTATION

16. **The extended GRM was established.** Decision No. 052 described above identified the members of the Supervision Commission and the BRG and spelled out their responsibilities and functions in detail. The main responsibilities of the Supervision Commission were to approve the budgets for the BRG; plan, coordinate, and supervise the implementation of grievance management functions; convene monthly grievance redress evaluation meetings; monitor grievance resolutions undertaken by the BRG; and periodically report on grievance management to the EDC Board of Directors, GoC, and Project financiers. The functions enumerated for the BRG included all that are normally part of a GRM on a Bank-supported project, plus reporting to the Supervision Commission on resolution of grievances and on outreach activities, implementing the grievance management communications strategy, conducting training on grievance management, and preparing the general reports of the Technical Committee's works. In addition to the six BRG staff based in EDC Headquarters, two staff – a focal point and an assistant – were posted to a local BRG unit in the EDC Regional Branch at Bertoua.

17. **The GRM was officially launched at a meeting of EDC and World Bank at EDC Headquarters on May 31, 2018.** At the meeting, all existing documentation on grievances and complaints was formally handed over to the BRG, which commenced work almost immediately; minutes of a meeting held on June 13, 2018 show that the members reviewed the budget, validated the plan of action, examined the documents they had received, and created dossiers on seven pending grievances. Another meeting followed on June 18, 2018, at which the BRG began reviewing the seven dossiers. It also reviewed information on workplace accidents and work-related illnesses and decided on next steps for each, some of which involved demanding additional information from CWE and obtaining details on follow-up by the National Social Welfare Fund (CNPS). By this time, the BRG had in place its Communication Plan (issued April 19, 2018), its 2018 budget, and a manual describing the mechanism and elaborating the procedures for grievance management at EDC.<sup>1</sup> The BRG also prepared and issued the first Monthly Report of the activities of the Technical Committee, for

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<sup>1</sup> Mécanisme Révisé de Gestion des Plaintes et Prévention des Conflits dan le Cadre du Projet Hydroélectrique de Lom Pangar, issued in June 2018.

June 2018, which the Bank received from EDC on June 20, 2018. Regular monthly reporting has continued, and EDC also submitted an Annual Report prepared by BRG for 2018.

18. ***The BRG moved quickly to start processing pending grievances.*** The June 2018 report listed seven individual pending grievances from former employees and, as an eighth grievance, the situation of the 22 former employees that claimed to have contracted Hepatitis B during their employment. All eight grievances had been forwarded to EDC by the World Bank and the labor union. The report explained the action the BRG undertook for each case; examples include directing CWE to negotiate with the complainant, directing CWE to provide more information to CNPS, and requesting complainants to provide proof of payment reportedly issued by CNPS. Progress toward the milestones in the BRG Plan of Action was also reported. A copy of a letter from the DG-EDC asking the DG-CNPS to appoint a person as the focal point for the activities of the Technical Committee was included in the June 2018 progress report.

19. ***The BRG has been submitting monthly progress reports to the Bank on the status of all claims reviewed.*** In addition to that, the Bank team has been meeting regularly with the Borrower and BRG to discuss any specific issues related to the review of complaints.

20. The Monthly Report for July 2018 tracked the same eight cases and registered a new grievance, the first one received after the establishment of the BRG, from the mother of a worker who died in an accident on the dam construction site. Two of the pending former-employee grievances were closed during August. Copies of documents CWE had provided in response to the BRG's requests are appended to the August Monthly Report. It also mentions that the BRG had begun tracking 13 workplace-accident cases from the Project that had been reported directly to CNPS rather than to EDC, seven of which remained pending. The BRG reviewed all 13 cases and after investigation of their status, registered the eligible grievances that were still unaddressed by CNPS.

21. The Monthly Reports continued to track existing grievances and show new grievances from former employees registered directly with the BRG. The October 2018 report was notable in that it confirmed the closure of the Hepatitis B claims of the 22 former employees,<sup>2</sup> which could not be approved for indemnification because national regulations do not recognize Hepatitis B as a work-related illness. The last available report, dated March 2019, indicated that to date, a total of 20 grievances from former CWE workers had been received by the BRG. In addition to the eight submitted by the World Bank at the inception of the GRM action plan, in May 2018, the BRG received one new grievance in July 2018, and 11 more after the outreach campaigns on the revised GRM, which began in August 2018 after a delay of two months. One of the new grievances was filed by the labor union on behalf of a group of employees that were dissatisfied with worker housing; the rest were individual claims. Of the total of 20 grievances received, 13 have been closed and seven are still being processed. Tables 1 and 2 summarize the status.

22. All pending claims have been reviewed by the BRG and final decision on the issues is now awaited from the responsible national authorities (CNPS, Ministry of Labor), against which the claim is made. The BRG will, however, continue to monitor progress and assist claimants in the final step of having their claim processed by national authorities. As agreed with the Borrower, the GRM is required to remain operational and fully funded by the Borrower through Project closure and is expected to be maintained thereafter. This applies to the

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<sup>2</sup> This includes the 19 cases cited in the Action Plan.

extended scope of the GRM as well as the staff and logistics needed for the GRM. Bank Management notes that after the Bank Project closure, AFD will remain involved in the Project up to September 2020 and will also ensure that a GRM is maintained.

**Table 1: Status as of March 31, 2019 of Ex-Employee Grievances Brought to Attention of EDC by World Bank at Inception of extended GRM in May 2018**

	Nature of Grievance	Status as of March 31, 2019	Actions pending for BRG	Feedback from Complainant
<b>Grievances Closed</b>				
1	Indemnification and treatment for leg fracture (20% disability)	Case closed with disability allowance paid by CNPS	Write note of closure	Satisfied
2	Indemnification and treatment for hernia	Case closed. Complainant has informed BRG of satisfaction with support from CWE.	Write note of closure	Satisfied
3	Indemnification and treatment for electrocution (75% disability)	Case closed. Monthly payment and medical support from CNPS.	None	Partially satisfied. CNPS medical support process is slow according to complainant
4	Treatment for a workplace accident	Case closed. The victim is receiving a permanent monthly disability allowance paid by the CNPS.	None	Satisfied
5	Treatment for a workplace accident	Case closed. The victim is receiving a permanent monthly disability allowance paid by the CNPS.	None	Satisfied
6	Indemnification for workers with Hepatitis B	Case closed. Ineligible under national regulations as VHB is not recognized as occupational disease in the context of Lom Pangar dam construction.	None	No feedback
7	Indemnification and treatment for broken ankle	Case closed. CWE paid for medical care.	Write note of closure	Satisfied
<b>Grievance Pending</b>				
1	Indemnification and treatment for eye injury (25% disability)	While this case had gone to the tribunal, lobbying by BRG led to agreement for supplementary investigation by CNPS and the Labour Ministry in March 2019.	Complete the investigation by CNPS and Labour Ministry.	None

**Table 2: Status as of March 31, 2019 of Ex-Employee Grievances Registered with BRG After Its Inception in May 2018**

N°	Nature of Grievance	Status as of March 2019	Actions Pending	Feedback from Complainant
<b>Grievances related to workplace accidents</b>				
1	Fatality following workplace accident	Case closed. The widow is receiving a monthly payment from CNPS and the children school expenses are paid by CNPS until their 21st birthday.	None	Satisfied
2	Workplace accidents July 29 and October 24, 2012	Case closed by CNPS. The victim is receiving a permanent monthly disability allowance paid by the CNPS.	None	Satisfied
3	Fatality following workplace accident	In process. No documents have been sent to support the request. No file found at CNPS.	The rights-holders need to declare themselves to CNPS, BRG to assist.	None
4	Fatality as a result of a current illness	In process. No documents have been sent to support the request.	The rights-holders need to declare themselves to CNPS, BRG to assist.	None
5	Indemnification for death of complainant's husband in workplace accident 2/29/2016	In process. - Request rejected by CNPS due to imprudence and disregard of safety rules. - CNPS reopened case after lobbying by BRG.	BRG to continue monitoring	None
6	Indemnification for death of complainant's son in an accident	In process. Not declared to CNPS. Initial analysis by CNPS indicates the accident was a case of an intentional fault.	The rights-holders need to declare themselves to CNPS, BRG to assist.	None
7	Reimbursement of medical costs due to a workplace accident	In process. Files under review by medical advisor.	BRG to continue monitoring the case at CNPS.	None
<b>Grievances related to management of workers' contracts</b>				
8	Failure to pay housing and meal allowances	Case closed. CNPS determined that national regulations do not require payment of these allowances when employer provides lodging and meals.	None	Not satisfied. Complainant may appeal to workplace inspection authorities and then to the tribunal.

N°	Nature of Grievance	Status as of March 2019	Actions Pending	Feedback from Complainant
9	Same as above	Case closed. Same as above.	None	Not satisfied. Same as above.
10	Same as above	Case closed. Same as above.	None	Not satisfied. Same as above.
11	Same as above, but with multiple complainants	Case closed. Same as above.	None	Not satisfied. Same as above.
12	Request to receive payment for full contractual rights under the Lom Pangar Project by an EDC employee	In process in EDC Human Resources.	BRG to continue monitoring	

23. ***The Technical Committee launched the GRM Outreach Campaign in August 2018.*** Its first event, held August 1-2, 2018, was in two parts – a “post-Project follow-up workshop” for former employees and an “awareness-raising session” for the extended GRM system. The 73 participants included officials from the East Region, representatives of the former employees of CWE, representatives from Project-affected localities, NGOs and other civil society representatives, the Project Coordinator, and representatives of the World Bank. One of the key recommendations from the workshop was to convene a working meeting of the BRG, CNPS, the Ministry of Labor and Social Security, and the labor union. The meeting took place on August 28, 2018; the participants reviewed the former employees’ situation and clarified and harmonized their approach to managing the grievances. Evidence of the immediate effectiveness of the outreach is that six of the 12 new former-employee grievances mentioned above were received during August.

24. The next outreach events were a series of week-long “caravan” missions that BRG staff and the QHSE consultant conducted, traveling to three cantons in November and four cantons in December, with five objectives:

- to build the capacity of cantonal committees to implement the revised GRM;
- to screen the database of grievances;
- to publicly review and assess at least 80 percent of registered grievances;
- to make observations in the villages on the extent and presumed existence of harm associated with the grievances; and
- to adopt an operational strategy for future GRM caravans.

25. ***The Bank continued implementation support throughout 2018 and into 2019.*** The Terms of Reference for the QHSE consultant were prepared in February 2018, and the Bank issued the consultant’s contract on May 31, 2018, to run until December 31, 2018. The consultant’s first report presented recommendations for the design, organization, and implementation procedures for the extension of the GRM to address former-employee grievances. The consultant assisted the BRG in preparation and conduct of the various outreach activities described above and prepared reports on their proceedings. During the period ending

June 30, 2018, the Consultant submitted all required deliverables to the Bank. The contract was later extended to June 28, 2019, to allow for follow-up of the BRG activities up to Project closure. The Bank also confirmed that AFD would extend the contracts of the E&S Panel and ATESI through September 2020, closing date of their financing. The Bank continued intensive supervision of the Project, with missions including safeguards staff in January-February, July and December 2018, March 2019 and a planned final supervision mission for May-June 2019, as reported in the Implementation Status and Results Reports (ISR) of May 2018 and February 2019. Bank staff also attended key GRM events, including the launch workshop for the extended GRM (May 31, 2018) and three Follow-up Workshops<sup>3</sup> (August 1-2, 2018, November 6-12, 2018 and December 5-12, 2018). As noted earlier, the Bank extended the Project closing date to June 28, 2019, in part to allow extra time for EDC to close out grievances.

26. ***There have been some delays in the completion of the Action Plan from the timeline indicated in the Management Response.*** The Action Plan anticipated that the consultant's first report would be completed in April 2018, and work to resolve former-employee grievances could therefore begin in May. EDC issued its Communication Plan for the GRM on April 19, 2018. The Plan of Action and the budget for the Technical Committee covered the period from June 1 through December 31, 2018 and, as described above, grievance management work commenced in June. There was a two-month delay in establishing and staffing the extended GRM, expected in March 2018 and completed in May. However, once the BRG was established, it moved aggressively to carry out its mission, with the result that there was only a one-month delay in starting the grievance processing (June 2018 instead of May 2018). A new budget for the operating costs of the BRG and the planned outreach campaigns was approved by the Bank in January 2019 for the period up to June 28, 2019. The objective of the BRG is to close all pending cases by the closure date of the Project, on June 28, 2019.

27. ***Funding has been consistent with the commitment in the Action Plan.*** The Bank engaged and funded the QHSE consultant. IDA Project funds are available to support the BRG activities until Project closure on June 28, 2019, after which AFD, as part of its supervision activities, will ensure that the BRG remains in place and functioning until AFD's involvement with the Project ends in September 2020. The Bank will also follow up with AFD on the resolution of residual grievances, if any. AFD is funding the extensions of the E&S Panel and ATESI. To date, EDC has not encountered any difficulty in arranging for payment of compensation by CWE.

28. ***Government commitment has remained strong.*** EDC has fully lived up to the undertakings articulated in Decision No. 052. The Ministry of Labor and Social Security has been supportive, and its regional agencies have been actively involved with the work of the BRG. Collaboration with CNPS has been reliable and effective, as documented in the tables that show the status of former-employee grievances in the Monthly Reports. The summaries of the caravan proceedings show that local governments have played an important part in managing the grievances from the general population.

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<sup>3</sup> These consultative workshops allowed: (a) the claims of former employees to be collected; and (b) presented an opportunity to reach out to villages within the zone of influence of the Project and registered new claims from Project affected people. For example, in December 2018, two cases of drowning downstream of the dam were registered and are under analysis, to better understand if the cause is Project-related. As these claims are not work-related issues, they are not the subject of nor detailed in this update.

## V. CONCLUSION

29. ***All actions contained in the Action Plan have been implemented and Management is monitoring their completion, which is expected by the extended Project closing date, June 28, 2019.*** The performances of Government, EDC, the Bank, and AFD have all been instrumental in implementing the Action Plan. The results to date have been positive, and there is continued support and commitment from all parties to complete the agreed actions. Management is confident that all GRM-recorded claims from former employees registered by the BRG will be addressed by June 28, 2019. Moreover, AFD will continue supervising the Project and the Bank will continue to regularly follow up with AFD should there be any unresolved grievances.