



30 September 2026

Secretariat Remedial Action Plan (RAP) in relation to IRM Case C-0009 concerning FP039, “GCF-EBRD Egypt Renewable Energy Financing Framework”

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Introduction

1. This Remedial Action Plan (RAP) is prepared in response to Board decision B.44/10 concerning IRM Case C-0009 (FP039).
2. The purpose of the RAP is to set out the actions the Secretariat will take, or will pursue to implement the seven recommendations and seven suggestions endorsed by the Board and directed to the Secretariat.
3. The RAP translates these endorsed items into concrete, monitorable steps, distinguishing between (i) actions that can be implemented directly by the Secretariat, and (ii) actions that require engagement with EBRD and other relevant parties.
4. In line with the IRM Procedures and Guidelines, the RAP provides the basis for implementation, monitoring and reporting, and reflects the operational, contractual, and post-completion context of FP039.

Consultation with stakeholders during the development of the draft RAP

5. Prior to the formal consultation phase under the IRM Procedures and Guidelines (PGs), the Secretariat engaged in a series of informal, without-prejudice exchanges with relevant stakeholders, including the IRM and the Accredited Entity (EBRD), to support factual validation, assess implementation feasibility, and strengthen the monitorability of proposed actions. These interactions took place through written exchanges, bilateral calls, and meetings at various stages of the process, including in the lead-up to and following the issuance of the IRM report and during the preparation of the draft Remedial Action Plan (RAP). The purpose of these exchanges was to clarify stakeholder perspectives, identify practical constraints—particularly for actions requiring third-party engagement - and align, to the extent possible, on approaches to evidence and reporting. These exchanges did not constitute the formal consultation process under the PGs. Formal consultation on the draft RAP was conducted in accordance with the PGs following internal clearance and circulation to the IRM, the complainants (through the IRM), and the Accredited Entity.
6. The Secretariat notes that the development of this RAP represents the first instance of a Remedial Action Plan prepared by the GCF. In this context, the Secretariat has adopted an iterative drafting approach, incorporating feedback received through informal exchanges with the IRM and the Accredited Entity in order to progressively strengthen the clarity, feasibility, and monitorability of the proposed actions.
7. In particular, feedback received during these informal exchanges has informed revisions to: (i) ensure that the language of the RAP reflects the full text of the IRM's recommendations and suggestions; (ii) provide greater specificity on proposed actions, timelines, and evidence requirements; (iii) clarify the application of the Secretariat's mandate and the role of engagement with EBRD and other relevant parties; and (iv) strengthen the overall internal consistency and structure of the RAP, including the articulation of escalation, monitoring, and closure approaches.
8. These refinements are reflected in the present draft and are intended to support a more effective and implementable remedial framework, while remaining fully consistent with the formal consultation process under the IRM Procedures and Guidelines.
9. Timeline 2026

Feb 2026 (12 Feb)	Secretariat – IRM – EBRD	Final IRM report shared with EBRD (due to technical difficulties)
19 Mar 2026	Secretariat – EBRD	Bilateral discussion on IRM report

24 Mar 2026	EBRD – Secretariat	Written exchange (EBRD position)
26 Mar 2026	Secretariat – EBRD	Bilateral meeting
14 Apr 2026	Secretariat – EBRD	Bilateral meeting
15 Apr 2026	Secretariat – EBRD	Bilateral meeting
16 Apr 2026	Secretariat – IRM	Coordination meeting (RAP)
17 Apr 2026	IRM – Secretariat	Report publication / notification
Apr–May 2026	Secretariat – EBRD	Mission-level engagements (Europe)
20–23 May 2026	Secretariat – IRM – EBRD	RAP preparation exchanges
22–23 May 2026	Secretariat – IRM – EBRD	Preparation for circulation
26 June	Secretariat	Draft RAP circulated
July–September	IRM–Complainants–EBRD	Comments received from stakeholders

Comments received from stakeholders on draft RAP

10. Stakeholders have been provided a meaningful opportunity to comment on the draft RAP through written submissions. Consistent with the PGs, the draft RAP has been shared with the IRM, the complainants (through IRM), and the Accredited Entity, with a minimum of 10 calendar days to provide comments.

11. Following receipt of comments from stakeholders, the Secretariat has taken them into account and finalized the RAP, with agreement from the IRM. The consultations have been conducted with due regard to protection of personal information and confidentiality.¹

¹ As per the approach followed by the IRM in the IRM Final Report, the names of the complainants are not disclosed to protect personal information and confidentiality.



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Stakeholder	Comments received	Secretariat treatment	Reason / Resulting adjustment to RAP
IRM	(i) Early engagement with stakeholders: For sufficient assessment of feasibility and clarity of proposed actions, the Secretariat should engage with stakeholders, namely the AE and the IRM, earlier in the development of the RAP. The Secretariat held extensive discussions with EBRD, details of which are now included in the RAP. The IRM encourages that this level of early engagement continues for future RAPs, and that the IRM also continues to be consulted at early stages in order to provide feedback. These engagements are suggested to begin prior to formal Board endorsement for any recommendations the Secretariat believes would benefit from such early engagements. (ii) Detailed and clarified steps and timelines: Early versions of the RAP lacked specificity in timelines, actions, and follow-ups, and were generally structured around plans for communications with EBRD rather than active engagement by the Secretariat. The IRM notes that under the Board decision, the development and implementation of the RAP falls under the Secretariat's responsibility, meaning the Secretariat's role in implementation of the RAP goes beyond simple notifications and communications to the AE.	None as the IRM has been consulted on the RAP prior to formal consultation, thus the comments received as IRM response and reproduced in this table have been submitted as <i>"lessons learned for the Secretariat's consideration in the development of future RAPs"</i>.	No adjustments to the RAP

	The IRM notes that the Secretariat has gone into further detail as a result of feedback given through the informal consultations, and that specific, timebound follow-up actions have been clarified in certain instances. Overall timelines have been further defined, and the IRM emphasizes the importance of keeping to these timelines in order to provide timely remedy to the Complainants and improve processes within GCF. However, in certain instances, the Secretariat has not sufficiently detailed its proposed actions, and instead has deferred them to be developed at a later stage. The Secretariat's response to Suggestion 4, proposing and agreeing to a postcompletion monitoring arrangement within 30 days of RAP finalization, is an action that should have been feasible to have been defined and proposed at an earlier stage, particularly given the extensive informal consultations that the Secretariat held with EBRD. The Secretariat should address, to the extent possible, all recommendations with concrete, timebound plans and actions during the development of the RAP, rather than deferring their development to a later stage. Adherence to Board-approved recommendations: Early drafts of the RAP did not include the full Board-endorsed recommendations, and rather used summarized recommendations to develop the RAP. The IRM recommends that in future RAPs, the Secretariat use the full recommendation language from the beginning of the RAP process, as this can have an effect on the framing and development of the Secretariat's follow-up actions. The IRM also notes that for Board-endorsed recommendations, RAP development should focus on implementation, rather than reconsideration of and disagreement with the recommendations themselves.		
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	Capturing lessons learned: From this first RAP development, there are a number of lessons learned to be taken on for future RAPs. The IRM encourages the Secretariat to capture and communicate these lessons learned for knowledge management and process improvement purposes within the Secretariat. This will help to ensure consistency and continuity in the development of future RAPs.		
Complainants (through IRM)	Complainant 1 did not provide a formal response. Relevant responses provided by Complainant 2 are included below. The IRM delivered these comments without altering the language and did not include its views on their appropriateness. On recommendation 4: Thank you for this recommendation. On recommendation 5: This recommendation concerns compensation equal to four months of my salary, which I had already commented on in the previous report at your request. As I explained then, this salary has effectively become equivalent to the salary of a cleaner or pantry worker, who now earns four times what I used to earn at the Facilities Management Company. As we say in Egypt, this amount "is neither here nor there". I had also objected to my salary while I was employed there, and the manager promised that it would be increased soon. On recommendation 6: Thank you for this recommendation as well. However, I would like to ask: what happens if they refuse to implement it? What benefit would I receive in that case? What would happen then? How would my reputation be restored before everyone at the site after all the social and economic harm they caused me? On the Secretariat follow-up: Thank you very much. I sincerely hope that your follow-up will also include monitoring the violations they continue to commit.	Noted, yet payment quantum in Recommendation 5 was decided by the Board. Noted; as mentioned below, EBRD retains soft leverage and will pass on the recommendations to both BSDA and HSH. Noted; the draft RAP already includes provisions for monitoring as suggested by the Board	No adjustments to the RAP No adjustments to the RAP No adjustments to the RAP

Accredited Entity (EBRD)	As general comments on the project-specific recommendations and suggestions: • As previously highlighted to GCF Secretariat and GCF IRM, the majority of recommendations and suggestions will be for Health and Safety Home (HSH) to implement, the Facility Management Company (FMC) in place at the time of the facts raised by the complainants. • EBRD has no contractual privity with the Benban Solar Developers Association (BSDA) or the FMC and is reliant on soft-leverage through a working relationship with BSDA and arms-length engagement with the FMC. EBRD will pass on recommendations and suggestions to BSDA for them to share with HSH. EBRD will however have no leverage to enforce these recommendations and suggestions. • As previously announced, the FMC role has been re-tendered and EBRD has been informed that EDEN is the winning bidder. Their contract is under review and is expected to be signed shortly. The contract with HSH has subsequently ended in July 2026. Therefore, the leverage to engage HSH for retrospective remedy in relation to the recommendations and suggestions is expected to be very low. • The fact that BSDA and HSH were not consulted in previous stages is also another factor that will potentially decrease the likelihood of cooperation to implement recommendations and suggestions. • Finally, the fact that Egyptian local courts dismissed the cases and that IFC CAO dismissed and closed one of the complaints decreases the chance of BSDA and HSH to implement recommendations as it would mean for them to disregard local court and IFC CAO decisions, argument previously used by HSH. On specific suggestions and recommendations:	The general comments are noted, with most having been anticipated in the development of the draft RAP, through previous engagements with EBRD.	No adjustments to the RAP
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	On suggestion 2: EBRD will provide evidence of the disclosure of the GMP and associated actions by HSH. On suggestion 4: EBRD suggests submitting a tailored report, by annual reporting timeline, in a form to be agreed with the GCF Secretariat.	Noted.	
	On recommendation 2: EBRD will pass on this recommendation to BSDA to share with HSH. EBRD will however have no leverage to enforce this recommendation. On recommendation 3: EBRD will pass on this recommendation to BSDA to share with HSH. EBRD will however have no leverage to enforce this recommendation. On recommendation 4: EBRD will pass on this recommendation to BSDA to share with HSH. EBRD will however have no leverage to enforce this recommendation. On recommendation 5: The payment of compensation is not embedded in any EBRD policies or procedures and EBRD cannot act on this recommendation. EBRD will pass on this recommendation to BSDA. EBRD will however have no leverage to enforce this recommendation. On recommendation 6: EBRD will pass on this recommendation to BSDA. EBRD will however have no leverage to enforce this recommendation.	EBRD's suggestion is similar to the existing proposal, yet the Secretariat would prefer to not commit annual reporting frequency at this stage, and rather follow the approach outlined in the RAP and determine jointly with EBRD the most adequate reporting frequency after the adoption of the RAP. Noted. Noted. Noted. Noted. Noted.	

Annex A – Remedial Action Plan matrix

A. Project-specific Recommendations and Suggestions

Standard EBRD engagement protocol (applies to all EBRD-dependent items in Annex A)

For each EBRD-dependent item, the Secretariat will pursue a structured, time-bound engagement process designed to maximise the likelihood of implementation of the Board-endorsed action, while recognising that delivery may depend on EBRD and, where relevant, other third parties.

Step 1 (Initial engagement request): Within the timeline indicated for the relevant item, the Secretariat will send a formal written request to EBRD referencing the Board decision and the relevant endorsed recommendation or suggestion. The request will specify: (i) the outcome sought; (ii) the concrete action or actions the Secretariat is asking EBRD to facilitate, undertake, or support; (iii) the information, documentation, or confirmations sought; (iv) any target timeframe for implementation; and (v) the evidence that EBRD can share, or confirm exists, consistent with applicable policies, procedures and confidentiality constraints.

Step 2 (Substantive response and follow-up): The Secretariat will ask EBRD to provide a substantive response within the timeframe indicated for the relevant item. For the purposes of this RAP, a substantive response means a response that goes beyond acknowledgement and sets out EBRD's position on feasibility, the steps it will take or propose to take, the expected timeframe, and any constraints affecting implementation. If no substantive response is received within the requested period, the Secretariat will issue reminder(s) and follow up through the relevant working-level counterparts.

Step 3 (Escalation): If no substantive response is received after follow-up, or if progress is not being made, the Secretariat will escalate the matter through appropriate management channels. Escalation may include raising the matter with more senior counterparts at EBRD, using existing institutional relationships and good offices to seek attention to the Board-endorsed action, clarifying urgency and expected next steps, and engaging relevant internal Secretariat functions, including OGC and Operational Safeguards as appropriate, to support the engagement. The purpose of escalation is to maximise the likelihood of implementation through institutional follow-up and management attention; it does not imply the exercise of powers beyond the Secretariat's mandate or contractual arrangements.

Step 4 (Concrete implementation follow-up): Where EBRD indicates that the requested action is feasible, the Secretariat will follow up on actual implementation of the action within the target timeframe identified for the relevant item. This includes seeking confirmation of what has been done, by whom, and by when, and requesting any evidence that can be shared, or confirmation that such evidence exists but cannot be shared due to confidentiality or other applicable constraints.

Step 5 (Outcome logging and evidence record): The Secretariat will maintain an engagement record for each item, including dates of requests and follow-up, counterparts engaged, responses received, any escalation undertaken, and any evidence or confirmations provided by EBRD or other relevant parties. Where actions relate directly to the complainants, the Secretariat will seek sufficient clarity on the specific actions taken or proposed, including their nature, timing, and status, to enable transparent communication of progress to the IRM and, through the IRM, to the complainants. In line with paragraphs 73 to 78 of the IRM's Procedures and Guidelines, the Secretariat will submit progress reports to the IRM every 2 months from the finalization of this RAP for the first 6-month period, and then no less frequently than every 6 months after that, for a period not to exceed 3 years, unless extended by the IRM.

Step 6 (Closure note): If, after reasonable and time-bound efforts, the action cannot be implemented, cannot be verified, or cannot be progressed further due to objective constraints, including EBRD policy constraints, confidentiality restrictions, third-party refusal, legal constraints, evidentiary limitations, or post-completion circumstances, the Secretariat will prepare a closure note. The closure note will document the outcome sought, the steps taken by the Secretariat, the responses received, any escalation undertaken, the constraints encountered, and the basis on which no further action is feasible within the Secretariat's mandate. Prior to preparing a closure note, the Secretariat will share with the IRM all documents and information related to its implementation efforts in order to provide the IRM with the complete picture of all steps taken. The IRM will be given an opportunity to review the record and revert with requests for information and suggestions on how to proceed. As part of the IRM's independent monitoring function on behalf of the Board, consensus should be reached between the Secretariat and the IRM as to whether a recommendation or suggestion has been satisfied, and if not, whether all reasonable steps have been taken to do so. If consensus is not reached, the IRM will follow the procedures outlined in paragraphs 76 and 77 of the Procedures and Guidelines.

Indicative timing: Unless otherwise specified for a particular item, the Secretariat will issue the initial request within 5 business days of RAP finalisation, seek a substantive response within 10 business days, follow up promptly where needed, and aim to clarify the implementation pathway or constraints within 30 calendar days. Where implementation depends on third-party action, completion of the underlying action will be pursued within the target timeframe identified for the relevant item, subject to cooperation by the relevant parties.

Recommendation / Suggestion	Secretariat Comment	Proposed Steps	Responsible Entity	Timeline	Evidence / verification
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Suggestion 2. The Secretariat seeks to confirm, through EBRD, the most recent version of the Grievance Mechanism Plan (GMP) has been disclosed to workers and associated induction and/or toolbox talks have taken place.	Confirmatory, evidence-based step via AE; Secretariat can request confirmation and document it. IRM Final Report acknowledged worker awareness; Secretariat action is to confirm GMP disclosure status through EBRD and record evidence.	Step 1 (Request): Send formal engagement request to EBRD referencing the Board-endorsed item, requesting confirmation that the most recent Grievance Mechanism Plan (GMP) has been disclosed to workers and that induction/toolbox talks (or equivalent worker briefings) have taken place. The request will specify the outcome sought, expected actions, and target timeframe, and will request any evidence that can be shared under EBRD policies (e.g. disclosure notice/circulation, induction or toolbox talk records, or management attestation where underlying records cannot be shared). Step 2 (Follow-up): Seek a substantive response from EBRD within 10	Secretariat project lead (via EBRD)	Initial request within 5 business days of RAP finalisation; substantive response sought within 10 business days; follow-up and escalation in accordance with the Standard EBRD engagement protocol; where feasible, implementation pursued within 30–60 calendar days, subject to cooperation by relevant parties; if not feasible, close on the basis of documented constraints.	Engagement request + follow-ups (engagement log); EBRD written confirmation; any supporting evidence received (or written confirmation that evidence exists but cannot be shared); closure note documenting constraints (if any).
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		business days, in line with the Standard EBRD engagement protocol. For the purposes of this RAP, a substantive response is one that confirms the status of the requested action (completed, in progress, or not feasible), outlines steps taken or to be taken, provides an indicative timeline for completion, and identifies any constraints affecting implementation. A response indicating that EBRD has initiated contact with relevant parties but is awaiting further information would be considered substantive only where it includes clear next steps and expected timelines. Step 3 (Escalation): If no substantive response is received, or if progress			
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		is not being made, apply escalation in accordance with the Standard EBRD engagement protocol. This includes follow-up through working-level counterparts and, where needed, escalation to relevant management levels within EBRD, using established institutional relationships and good offices to seek timely action and resolution. Step 4 (Implementation follow-up and outcome logging): Where the requested action is confirmed as feasible, follow up on implementation within an indicative timeframe of 30–60 calendar days, subject to cooperation by relevant parties, and record outcomes and any evidence received in accordance with the			
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		Standard EBRD engagement protocol. Step 5 (Closure): Where the action cannot be completed or verified due to objective constraints, document the steps taken, responses received, and the basis for closure in accordance with the Standard EBRD engagement protocol.			
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Suggestion 4. Work with EBRD to agree on continued risk-based monitoring arrangements for EBRD to monitor and report to GCF on implementation of the worker GRM at Benban Solar Park for 1-2 years, subject to review thereafter.	FP039 is completed and routine APR cycle is not the assumed evidence vehicle; any additional monitoring must be a bespoke, conditional arrangement with EBRD and time-bound.	Step 1 (Request): Propose to EBRD a structured, time-bound post-completion monitoring arrangement focused on the operation of the worker grievance redress mechanism (GRM) at Benban Solar Park. The proposal will set out a concrete monitoring approach, including: (i) scope of monitoring (GRM accessibility, usage, and resolution of grievances); (ii) proposed reporting frequency; (iii) types of information and evidence to be provided or confirmed (e.g. number and type of grievances, processing timelines, resolution status); and (iv) modalities for sharing such information, taking into account EBRD policies and	Secretariat project lead + Operational Safeguards (via EBRD)	Initial request within 5 business days of RAP finalisation; substantive response sought within 10 business days; follow-up and escalation in accordance with the Standard EBRD engagement protocol; aim to agree monitoring arrangement within 30 calendar days, subject to EBRD confirmation; where agreed, implementation for 1-2 years; if not agreed, close on the basis of documented constraints.	Agreed monitoring note/protocol (if any); engagement log; any periodic confirmations/reports received (if agreed); closure note recording outcome and constraints if not agreed.
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		confidentiality constraints. Step 2 (Follow-up): Seek a substantive response from EBRD within 10 business days, in line with the Standard EBRD engagement protocol, confirming whether such an arrangement can be implemented, what elements are feasible, and the proposed approach and timeline. Step 3 (Refinement and agreement): Where EBRD indicates that such an arrangement is feasible, engage with EBRD to refine and agree the scope, frequency, and evidence base of the monitoring arrangement, including any limitations or conditions.			
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		Step 4 (Implementation): Where agreed, implement the monitoring arrangement for a period of 1–2 years, with periodic reporting to the Secretariat in line with the agreed approach. Step 5 (Outcome logging and closure): Where such an arrangement cannot be agreed or implemented, document the proposal made, responses received, and any constraints in accordance with the Standard EBRD engagement protocol, and close the item on that basis.			
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Recommendation 2. Collaborate with EBRD to achieve, through engagement with, as appropriate, EBRD's GCF-financed clients, BSDA, and HSH, a written apology from the senior leadership of Complainant #1's former employer to Complainant #1 for shortcomings in the handling of his grievances and failure to uphold PS2.	Outcome depends on AE engagement and third-party willingness and feasibility. Secretariat role is to take reasonable steps via EBRD and document results/constraints,	Step 1 (Request): Send formal engagement request to EBRD referencing the Board-endorsed recommendation, requesting EBRD to facilitate, through its client chain and relevant parties (including BSDA and, where appropriate, FMC and/or HSH), a written apology to Complainant #1 from the appropriate party or parties. The request will specify the outcome sought, including the nature of the apology and confirmation of delivery, and will request any evidence that can be shared (copy of the letter if shareable, or written confirmation of issuance and delivery where content cannot be shared). Step 2 (Follow-up): Seek a substantive response	Secretariat project lead	Initial request within 5 business days of RAP finalisation; substantive response sought within 10 business days; follow-up and escalation in accordance with the Standard EBRD engagement protocol; where feasible, implementation pursued within 30–60 calendar days, subject to cooperation by relevant parties; where required, exploration of alternative pathways; if not feasible, close on the basis of documented constraints.	Engagement request pack; engagement log; EBRD response summary; documentary confirmation (if any); closure note documenting constraints/non-implementability basis (if applicable).
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		from EBRD within 10 business days, in line with the Standard EBRD engagement protocol, confirming feasibility, proposed approach, parties involved, and indicative timeline. Step 3 (Exploration of pathways): Where the initially identified party is not willing or able to issue the apology, the Secretariat will, through EBRD, explore with EBRD whether alternative pathways exist to achieve the intent of the recommendation, including engagement with other relevant parties, taking into account practical, legal, and reputational considerations. Step 4 (Implementation follow-up): Where a			
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		pathway is identified as feasible, follow up on implementation within an indicative timeframe of 30–60 calendar days, subject to cooperation by the relevant parties, and request confirmation of actions taken and any available evidence. Step 5 (Outcome logging and closure): Where the apology cannot be issued due to objective constraints, including third-party refusal, legal limitations, or reputational considerations, document the steps taken, responses received, and the basis for non-implementation in accordance with the Standard EBRD engagement protocol, and close the item on that basis.			
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Recommendation 3: Engage with EBRD to secure EBRD discussion with BSDA so that: i) HSH provides Complainant #1 with a full written account of employer payments and deductions in respect of his employment for the period from 24 November 2020 to end July 2022 inclusive; ii) HSH shares payslips for July-November 2022 with the complainant again; iii) HSH prepares full monthly salary statements for all earlier pay periods, including social insurance and tax deductions paid by the employer on behalf of the complainant, and shares these with the complainant. HSH and/or BSDA should also share relevant information and documents with EBRD, for sharing with GCF; and iv) HSH make a	Secretariat cannot compel BSDA; action is via EBRD engagement. Payment/back-payment outcomes are contingent and must be recorded as such; Secretariat can evidence steps taken and responses received.	Step 1 (Request): Send formal engagement request to EBRD referencing the Board-endorsed recommendation, requesting EBRD to facilitate discussions with BSDA, HSH and other relevant parties, and to support the provision of the specified pay-related documentation to Complainant #1, as well as clarification of any process for assessing and addressing potential back-payments. The request will specify the outcome sought, the concrete actions to be facilitated, and the target timeframe, and will request written confirmation of (i) documents provided and timing, and (ii) any process initiated to assess or implement remedial payments, together with any	Secretariat project lead (via EBRD)	Initial request within 5 business days of RAP finalisation; substantive response sought within 10 business days; follow-up and escalation in accordance with the Standard EBRD engagement protocol; where feasible, implementation pursued within 30–90 calendar days, subject to cooperation by relevant parties; if not feasible, close on the basis of documented constraints.	Engagement log; EBRD written confirmation; any documentary evidence received (or recorded limitation); closure note stating constraints and steps taken.
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back-payment of the difference to the complainant, and to include an appropriate adjustment for inflation, if full documentation shows that the complainant's salary was not increased by the statutory minimum in Jan. 2022.		evidence that can be shared or confirmed to exist. Step 2 (Follow-up): Seek a substantive response from EBRD within 10 business days, in line with the Standard EBRD engagement protocol, confirming feasibility, proposed approach, parties to be engaged, and indicative timeline. Step 3 (Engagement approach): The Secretariat will pursue the requested action through EBRD and, where appropriate and in coordination with EBRD, may engage in interactions involving relevant parties to support progress on the recommendation, within the Secretariat's mandate and consistent			
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		with the Fund's operating model. Step 4 (Implementation follow-up): Where actions are confirmed as feasible, follow up on implementation within an indicative timeframe of 30–90 calendar days, subject to cooperation by relevant parties, and request confirmation of actions taken and any available evidence. Step 5 (Outcome logging and closure): Where the requested actions cannot be completed or verified due to objective constraints, including third-party refusal, legal or contractual limitations, or evidentiary constraints, document the steps taken, responses received, and the basis for non-implementation			
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		in accordance with the Standard EBRD engagement protocol, and close the item on that basis.			
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Recommendation 4 Engage with EBRD to secure EBRD discussion with BSDA and HSH, so that: i) HSH provides Complainant #1 with a copy of his first contract of employment with the company; ii) regarding Complainant #2, HSH pay the amount due in respect of employee social insurance contributions during the period November 2020-April 2021 directly to the relevant authority, and then provide the complainant, BSDA and, through BSDA EBRD and GCF, with proof of payment; iii) reimburse complainant #1 for social insurance payments made by him and attributable to the period 24 November 2020 to 31 August 2021 inclusive, adding a sum to allow for inflation since then, and then	Same dependency and feasibility limits as R3; “resulting in” is treated as an objective, but Secretariat commitment is to reasonable steps and evidence/closure discipline.	Step 1 (Request): Send formal engagement request to EBRD referencing the Board-endorsed recommendation, requesting EBRD to facilitate discussions with BSDA, FMC, HSH and other relevant parties, and to support (i) provision of the relevant documentation to Complainant #1 and #2, and (ii) clarification and, where applicable, implementation of any payments or reimbursements related to social insurance. The request will specify the outcome sought, the concrete actions to be facilitated, and the target timeframe, and will request written confirmation of actions taken, documents provided, and any payments made, together with any evidence that can be	Secretariat project lead (via EBRD)	Initial request within 5 business days of RAP finalisation; substantive response sought within 10 business days; follow-up and escalation in accordance with the Standard EBRD engagement protocol; where feasible, implementation pursued within 30–90 calendar days, subject to cooperation by relevant parties; if not feasible, close on the basis of documented constraints.	Engagement log; EBRD response; any proof received (or confirmation that proof exists but cannot be shared); closure note documenting constraints and reasonable steps taken.
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provide BSDA and, through BSDA EBRD and GCF, with proof of payment.		shared or confirmed to exist. Step 2 (Follow-up): Seek a substantive response from EBRD within 10 business days, in line with the Standard EBRD engagement protocol, confirming feasibility, proposed approach, parties to be engaged, and indicative timeline. Step 3 (Engagement approach): The Secretariat will pursue the requested actions through EBRD and, where appropriate and in coordination with EBRD, may engage in interactions involving relevant parties to support progress on the recommendation, within the Secretariat's mandate and consistent with the Fund's operating model.			
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		Step 4 (Implementation follow-up): Where actions are confirmed as feasible, follow up on implementation within an indicative timeframe of 30–90 calendar days, subject to cooperation by relevant parties, including confirmation of (i) documents provided, (ii) payments or reimbursements made, and (iii) any supporting evidence available. Step 5 (Outcome logging and closure): Where the requested actions cannot be completed or verified due to objective constraints, including third-party refusal, legal or contractual limitations, confidentiality constraints, or evidentiary limitations, document the steps			
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		taken, responses received, and the basis for non-implementation in accordance with the Standard EBRD engagement protocol, and close the item on that basis.			
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Recommendation 5. Engage with BSDA, through EBRD in a manner consistent with EBRD's policies, to provide Complainant #2 with a payment equivalent to four months of her final salary at HSH. The monthly salary should be adjusted upwards for inflation and time elapsed.	Secretariat has no direct payment channel; any payment is third-party dependent. Secretariat role is coordination/engagement and documented reasonable steps; if not feasible, record non-implementability and basis.	Step 1 (Request): Send formal engagement request to EBRD referencing the Board-endorsed recommendation, requesting EBRD to engage with BSDA, HSH and other relevant parties to assess and, where feasible, facilitate the payment to Complainant #2 as set out in the recommendation. The request will specify the outcome sought (payment equivalent to four months' salary, with adjustments where applicable), the expected actions to be taken, and a target timeframe. Step 2 (Clarification of pathways and constraints): As part of the request, ask EBRD to outline (i) the potential pathways through which such a payment could be	Secretariat project lead (via EBRD)	Initial request within 5 business days of RAP finalisation; substantive response sought within 10 business days; follow-up and escalation in accordance with the Standard EBRD engagement protocol; where feasible, implementation pursued within 30–90 calendar days, subject to cooperation by relevant parties; if not feasible, close on the basis of documented constraints.	Engagement log; EBRD written feasibility/outcome confirmation; any payment proof received (if shareable); closure note including feasibility determination and basis if not feasible.
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		structured or facilitated, including through its client relationships, (ii) the roles of relevant parties, and (iii) any legal, institutional, or policy constraints affecting implementation. Where EBRD considers the payment not feasible, request a clear explanation of the specific constraints and the basis for this assessment. Step 3 (Follow-up): Seek a substantive response from EBRD within 10 business days, in line with the Standard EBRD engagement protocol, confirming feasibility, proposed approach, parties involved, and indicative timeline, or clearly setting out constraints where implementation is not possible.			
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		Step 4 (Engagement approach): The Secretariat will pursue the requested actions through EBRD and, where appropriate and in coordination with EBRD, may engage in interactions involving relevant parties to support exploration of feasible options, within the Secretariat's mandate and consistent with the Fund's operating model. Step 5 (Implementation follow-up): Where a pathway is identified as feasible, follow up on implementation within an indicative timeframe of 30–90 calendar days, subject to cooperation by relevant parties, and request confirmation of whether the payment has been made,			
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		including any available supporting evidence. Step 6 (Outcome logging and closure): Where the payment cannot be made due to objective constraints, including absence of a facilitating mechanism, third-party unwillingness, or legal or policy limitations, document the steps taken, options explored, responses received, and the basis for non-implementation in accordance with the Standard EBRD engagement protocol, and close the item on that basis.			
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Recommendation 6. Engage with EBRD on collaborative engagement with BSDA and the FMC to procure a public acknowledgement from BSDA that the FMC announcement of the non-renewal of Complainant #2's contract did not follow appropriate procedures, for a period of no less than three months in a place accessible to all FMC employees at the FMC's premises in the Benban Solar Park.	Outcome depends on engagement with EBRD and relevant third parties, including BSDA and FMC/HSB, and is subject to feasibility, legal, reputational, and operational considerations. The Secretariat's role is to pursue the Board-endorsed action through structured engagement, seek clarity on feasible modalities, and document outcomes and constraints.	Step 1 (Request): Send formal engagement request to EBRD asking it to engage BSDA/FMC/HSB to assess feasibility of a written/public acknowledgment (including the "posting" element) and to confirm (i) what form is feasible, (ii) what can be shared publicly or with IRM, and (iii) any constraints preventing issuance or posting. Request shareable evidence (copy of statement if shareable; otherwise written confirmation of issuance and posting arrangements, including duration/location). Step 2 (Follow-up): Seek a substantive response from EBRD within 10 business days, in line with the Standard EBRD engagement protocol, confirming feasibility, proposed approach,	Secretariat project lead (via EBRD)	Initial request within 5 business days of RAP finalisation; substantive response sought within 10 business days; follow-up and escalation in accordance with the Standard EBRD engagement protocol; where feasible, implementation pursued within 30–60 calendar days, subject to cooperation by relevant parties; if not feasible, close on the basis of documented constraints.	Engagement log; EBRD written response; disclosure screening record (if any statement is produced for publication); proof/confirmation of posting (if feasible); closure note documenting constraints if not feasible.
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		parties involved, and indicative timeline, or clearly setting out constraints where implementation is not possible. Step 3 (Exploration of pathways): Where the initially identified party is not willing or able to issue the acknowledgement, the Secretariat will, through EBRD, explore whether alternative pathways exist to achieve the intent of the recommendation, including engagement with other relevant parties, taking into account practical, legal, and reputational considerations. Step 4 (Implementation follow-up and evidence): Where a pathway is identified as feasible, follow up on implementation within an indicative timeframe			
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		of 30–60 calendar days, subject to cooperation by the relevant parties, and request confirmation of whether the acknowledgement has been issued, including any available supporting evidence (or confirmation that such evidence exists but cannot be shared due to applicable constraints). Step 5 (Outcome logging and closure): Where the acknowledgement cannot be issued or verified due to objective constraints, including third-party refusal, legal or reputational considerations, confidentiality constraints, or evidentiary limitations, document the steps taken, responses received, and the basis for non-implementation in accordance with the Standard EBRD engagement protocol,			
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		and close the item on that basis.			
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B. Systemic Recommendations and Suggestions

Recommendation / Suggestion	Secretariat Comment	Proposed Steps	Responsible Entity	Timeline
Recommendation 1: The Secretariat develops clear published guidance on 'necessary and appropriate' due diligence	This recommendation will be addressed through a broader review of the Secretariat's environmental and social due diligence approach, with the aim of clarifying the application of "necessary and appropriate" due diligence in a way that is risk-based, operationally practical, and consistent with the Fund's operating model.	Undertake a wider review of the Secretariat's environmental and social due diligence systems between May-December 2026. Said review is premised precisely on reviewing current practice, subsequently confirming a due diligence process that observes the relevant Board-approved policies and risk appetite, is commensurate to project-level risk and a fit to the Fund's diverse ecosystem of accredited entities and its position in due diligence. Internally consult and clear the systems note (Sustainability & Inclusion/OCIO-FO/Operational Safeguards/OGC as applicable), document the final internal guidance note and make it available internally with a public-facing summary Record issuance and link to the updated/related manuals (Operations/Programming/Appraisal guidance) to effectively embed its provisions across the Secretariat's practices and procedures.	Secretariat (Policy/Head, Sustainability & Inclusion/Operations lead with OGC + Operational Safeguards input; OCIO coordination).	As the work commissioned by the Secretariat carries a wider and more holistic scope, transcending this specific project and associated RAP, drafting and internal clearance is not expected before Q4 2026 (December 2026).

Recommendation 7: The Secretariat develops guidance on risk-based monitoring of projects/programmes that are the subject of ongoing IRM cases, taking account of the ESP and the Risk Management Framework	Following the approval of the revised Monitoring and Accountability Framework at B.42, the policy implementation plan will update the risk-based monitoring for all projects under implementation. A differentiated approach to monitoring GCF-IRM cases will also be evaluated.	Draft an IRM-case monitoring addendum (internal guidance) setting out (i) risk triggers (e.g., multiple complaints, reputational exposure); (ii) minimum monitoring actions during a case (engagement logs, risk record updates, management checkpoints); and (iii) coordination with IRM/OGC/Operational Safeguards and AE communications. Integrate the addendum into the relevant monitoring SOP / policy implementation plan workstream and communicate it internally to relevant teams. Record issuance and implementation (date issued; teams briefed; where stored).	Secretariat (Monitoring/Portfolio policy owner with Operational Safeguards + OGC input; OCIO coordination).	[Draft within 45 calendar days of RAP finalization; finalize/issue within 75 calendar days (or align issuance with the ongoing monitoring framework implementation plan milestone and document that linkage).]
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Suggestion 1: Provision is made for the Secretariat to have a right of access to legal documents, including loan agreements, that establish the legal terms on which GCF's finance is passed on to AE clients/borrowers/grantees/executing entities, or other direct beneficiaries.	The "access right" contemplated by this Suggestion is already embedded in the existing standard contractual architecture, and the access limitation encountered in case C-0009 is entity specific. There is no general gap in the standard AMA/FAA framework (which already supports access to legal documents relevant to projects/programmes). The Revised Approach to legal arrangements reflects the same approach. The Secretariat will continue to adopt this approach. The access limitation in case C-0009 stems from entity specific, Board approved deviations in the EBRD AMA that qualify disclosure by reference to the AE's applicable policies and procedures.	Suggestion 1 is already embedded in the existing standard contractual architecture and, unless the Board has approved otherwise, constitutes the Secretariat's practice. In particular, under the AMA/FAA framework, the FAA incorporates the AMA in its entirety, and the Board approved AMA template includes a provision requiring the Accredited Entity to ensure that all documents related to the AMA and individual projects/programmes are provided to GCF upon its request (in such detail as GCF may reasonably request). Under the Revised Approach to legal arrangements, Section 2.04 of the Standard Conditions, as published on the GCF website, similarly provides that the Accredited Entity shall cause that all documents related to the Standard Conditions, the FAA and individual projects/programmes to be promptly provided to GCF upon request (in such detail as GCF may reasonably request). The Secretariat will conduct a factual analysis for the purpose of identifying any entity-specific limitations of the above GCF access rights approved by the Board, together with the related portfolio of projects/programmes (the "Analysis"). The Secretariat will share the Analysis with the IRM. In light of the Analysis, and with respect to Accredited Entities for which entity-specific limitations of the above GCF access rights have been approved by the Board, the Secretariat will propose to: • With respect to effective FAAs for ongoing projects/programmes, seek written confirmation	OGC (with OCIO coordination).	Analysis to be shared with IRM by Q4 2026 (December 2026).
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		from the AE that the legal terms on which GCF's finance is passed on to AE, clients, borrowers, grantees, executing entities, or other direct beneficiaries have been passed down in a manner consistent with the relevant FAA; and • With respect to future FAAs for projects/programmes, in accordance with the Standard Conditions, include a provision granting the Secretariat the right to access legal documents, including loan agreements, that establish the legal terms on which GCF's finance is passed on to AE, clients, borrowers, grantees, executing entities, or other direct beneficiaries. Where such efforts are unsuccessful, the Secretariat will document the outcomes, share them with the IRM and report them to the Board.		
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Suggestion 11: There is scope for a standard operating procedure on review of APRs.	Following the approval of the revised Monitoring and Accountability Framework at B.42, the policy implementation plan will update the risk-based monitoring for all projects under implementation. A revised SOP for APR reviews will also be completed. However, the GCF does not adopt the practice of publishing its internal Standard Operating Procedures on GCF website	Finalize the APR review SOP (internal) as part of the monitoring framework implementation work. Develop a short public-facing description (one-pager) of the APR review approach (what is reviewed; risk-based escalation; how issues are tracked), without disclosing internal SOP mechanics. Record completion (SOP finalized date; internal dissemination; public-facing summary issued or rationale documented if not issued).	Secretariat (Monitoring/APR process owner; Operational Safeguards input; OCIO coordination).	[SOP finalization aligned to monitoring framework implementation plan milestone; target issuance of public-facing summary within 90 calendar days of RAP finalization (or document why a public-facing summary is not issued).]
Suggestion 12: The Secretariat provides clear guidance to ESS team members and AEs on the standard of diligence applied in Secretariat ESS APR review and monitoring.	The RAP should translate this into a practical, written standard: what the Secretariat reviews in ESS APRs, what triggers escalation, and how the Secretariat records judgments.	Current monitoring processes and practice will be included in the wider review of the Secretariat's environmental and social due diligence systems. In particular, ESS APR review processes will be probed in order to reflect the level of due diligence appropriate to the Secretariat's financial instruments and modalities. Draft a concise ESS APR review guidance note (internal, and shareable with AEs as appropriate). Conduct a short internal briefing for ESS reviewers; share the guidance (or a shareable version), accompanied by a webinar with AEs through existing communication channels. Record issuance and briefing completion (date, audience, location of guidance note).	Head Sustainability & Inclusion with support from Operational Safeguards with Monitoring/APR process owner and OGC input as needed; OCIO coordination.	As the work commissioned by the Secretariat carries a wider and more holistic scope, transcending this specific project and associated RAP, drafting and internal clearance of the proposed Guidance Note is not expected before Q4 2026 (December 2026).

Suggestion 14: The Secretariat discuss and agree post-Completion ESS reporting and monitoring arrangements with EBRD and that these continue for as long as necessary for the IRM's findings of Programme non-compliance to be addressed in accordance with GCF Board-approved remedial actions. The Secretariat will also consider whether risk-based monitoring under the 2018 ESP demands additional ESS monitoring on matters other than the issues raised by the complainants in this case.	Routine post-completion APR/ESS reporting does not continue. Any post-completion arrangement must therefore be bespoke, conditional, time-bound, and focused on what is necessary to evidence endorsed items.	Step 1 (Request): Propose to EBRD a structured, time-bound post-completion ESS reporting and monitoring arrangement focused on addressing the Board-endorsed remedial actions. The proposal will specify: (i) scope of monitoring; (ii) reporting frequency; (iii) types of information and evidence required; (iv) roles and responsibilities; and (v) modalities for sharing information, subject to EBRD policies and confidentiality constraints. Steps 2–4: Apply Standard EBRD engagement protocol (follow-up/escalation; outcome logging; closure note if not feasible / not agreed). If agreed, document the arrangement in a short written note/protocol and implement for the agreed period; if not agreed, close on documented constraints.	Secretariat project lead + Operational Safeguards (via EBRD; OGC input as needed).	Engagement to EBRD within 10 business days of RAP finalization; aim to conclude feasibility determination/protocol within 30 calendar days; if agreed, implement for the agreed time-bound period; if not agreed, close with rationale.
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Suggestion 15: The Secretariat, in line with Paragraph 27 of the 2025 Updated MAF, gives further consideration in the context of the RMF how to best integrate post-completion ESS reporting and Secretariat monitoring into future AMAs (as relevant) and FAAs.	This is a forward-looking, systemic design item. The RAP should convert it into a concrete Secretariat deliverable: clause options / guidance for future legal arrangements and integration into templates/process notes, consistent with RMF context.	Draft a short options note setting out approaches to post-completion ESS reporting/monitoring (when it may be appropriate; time-bound design; evidence expectations; confidentiality guardrails). Translate the preferred approach into internal drafting guidance for future legal negotiations (or internal template notes) Record issuance (note finalized; template notes updated; internal circulation completed).	Monitoring/ policy owners (joint), Operational Safeguards with OCIO coordination and OGC support	[Options note within 60 calendar days of RAP finalization; internal guidance integration within 90 calendar days (or aligned to the next scheduled template revision cycle with documented linkage).]
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Disclaimer

This Remedial Action Plan (RAP) is prepared by the Secretariat of the Green Climate Fund (GCF), in collaboration with the accredited entity and the Independent Redress Mechanism (IRM) of the GCF, as requested by the GCF Board in Decision B.44/10, in connection with the IRM Case C-0009 concerning FP039, "GCF-EBRD Egypt Renewable Energy Financing Framework". The RAP is intended to set out, in a structured manner, the steps that the Secretariat proposes to take, or to pursue within its mandate, in accordance with the applicable legal framework, including GCF policies and procedures, to address the recommendations and suggestions endorsed in paragraphs (c) and (d) of Decision B.44/10. Where the RAP refers to steps involving other actors, such references do not create authority over or obligations for such actors beyond what is provided in the applicable legal framework. The RAP is prepared for institutional and procedural purposes only and may be updated, supplemented, or superseded in accordance with subsequent Board decisions or in line with the Procedures and Guidelines of the IRM. Nothing in this RAP creates any legal duty or obligation for the Secretariat beyond those already applicable under the applicable legal framework; or determines any legal responsibility, liability, or wrongdoing of the GCF. No part of this RAP may be relied upon as a source of legal interpretation or used in any judicial, arbitral, regulatory, or similar proceeding except with the express written authorization of GCF.