

INTERNATIONAL FINANCE CORPORATION

MANAGEMENT PROGRESS REPORT

ON

**IMPLEMENTATION OF THE
MANAGEMENT ACTION PLAN**

FOR

**BRIDGE INTERNATIONAL ACADEMIES (BRIDGE-04)
(PROJECT# 32171, #38733, #39170, #39224)**

KENYA – EAST AFRICA

March 6, 2026

Contents

ABBREVIATIONS AND ACRONYMSiii

I. MAP IMPLEMENTATION OVERVIEW 1

II. MAP IMPLEMENTATION UPDATE 1

III. UPDATE ON MAP ACTIONS 5

IV. DISCLAIMER.....15

ABBREVIATIONS AND ACRONYMS

AC	Advisory Committee
CAO	Office of the Compliance Advisor Ombudsman
CSEA	Child Sexual Exploitation and Abuse
CSO	Civil Society Organization
CY	Calendar Year
ECPR	Emergency Child Protection Response
E&S	Environmental and Social
FI	Financial Intermediary
FY	Fiscal Year
GBV	Gender-Based Violence
GBVH	Gender-Based Violence and Harassment
GOK	Government of Kenya
IFC	International Finance Corporation
MAP	Management Action Plan
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
TWG	Technical Working Group
UN	United Nations
UNFPA	United Nations Population Fund
UNICEF	United Nations Children’s Fund
WBG	World Bank Group

I. MAP IMPLEMENTATION OVERVIEW

1. This Management Progress Report provides an update by International Finance Corporation (IFC) Management on the implementation of the [Bridge-04 Management Action Plan \(MAP\)](#). This follows progress reports to the Board in October 2024, March 2025 and July 2025, as well as a July 2025 technical briefing to the Board.
2. The MAP was approved by the Board on March 13, 2024, in response to the Compliance Investigation Report resulting from the Office of the Compliance Advisor Ombudsman (CAO) investigation into IFC's investment in Bridge International Academies (Bridge-04) in Kenya. The complaint is related to Projects #32171, #38733, #39170, and #39224, which were education sector projects in Kenya. IFC made an equity investment in NewGlobe Schools, Inc., the former parent company of Bridge International Academies ("Bridge").
3. IFC exited its direct investment in NewGlobe Schools, Inc. in March 2022. After this exit, IFC had an indirect exposure to Bridge through a financial intermediary, Learn Capital Venture Partners Fund III (Project #32429, hereinafter "Learn Capital"). As of February 2024, Bridge became an independent foundation in Kenya with no equity ownership by NewGlobe Schools. Neither Learn Capital nor IFC have any exposure to Bridge.
4. The Board-approved MAP has two broad workstreams: (1) developing a remediation and prevention program in Kenya (hereafter the "*Kenya GBV and CSEA Response and Prevention Support Program*" or "*The Program*"); and (2) strengthening management of gender-based violence (GBV), including child sexual exploitation and abuse (CSEA), risks in IFC's investments.
5. Between June and August 2023, CAO received additional complaints from four former students at Bridge Academies alleging abuse while at the school. CAO determined that these complaints are substantially related to the issues investigated under the Bridge-04 compliance process. In August 2024, CAO merged these complaints, received in relation to IFC's indirect investment in Bridge through Learn Capital, with Bridge-04: see the [Learn Capital 04 Compliance Appraisal Report](#).
6. In the July 2025 technical briefing to the Board and the July 2025 Management Progress Report, IFC outlined the *Kenya GBV and CSEA Response and Prevention Support Program* developed under the MAP, the comprehensive engagement and consultation process employed in its development, and the plan for implementing the Program. The Program's response component will enable survivors of GBV and CSEA to access the services they need for their recovery journey, while the prevention component will support ongoing efforts to reduce community acceptance of CSEA.
7. IFC invested in Bridge with the ambition of helping children in Kenya gain access to quality education and the opportunities that come as a result. This case has underscored the importance of safeguarding vulnerable populations, particularly children, and working with clients so they address occurrences of GBV and child sexual abuse in projects. IFC continues to build on the lessons learned from this case to foster a culture of accountability, learning, and proactive engagement.

II. MAP IMPLEMENTATION UPDATE

This section provides an update on progress towards implementing the Bridge-04 MAP since the July 2025 Management Progress Report. The update is arranged by the two primary workstreams outlined in

the MAP: Workstream A, implementation of the Kenya GBV and CSEA Response and Prevention Support Program; and Workstream B, Strengthening IFCs capacity to manage GBV and CSEA in investments. Throughout, reference is made to the section of the MAP which the activity supports. The MAP table is found in section III.

Workstream A: Kenya GBV and CSEA Response and Prevention Support Program

8. **Program Implementation:** Since the July Management Progress Report, work has focused on establishing the technical, administrative and financial arrangements under which the Program will be implemented. IFC is engaging with the selected implementing partners to detail Program activities and timelines, including KPIs and exit milestones for the Program. IFC expects all details needed to finalize the grant agreements to be available by the end of March 2026. All program related materials (technical protocols, service guidance, etc.) will be developed in the same period (item A.1.b in MAP). As part of the grant finalization process, IFC is working with implementing partners to create the results framework, which IFC anticipates will be completed in Q4 FY26 (item A.1.c in MAP).
9. **Implementing partners:** In the July 2025 Management Progress Report, IFC stated it will engage one implementing partner to administer, provide technical support, and oversee the overall activities of the response and prevention program and that the primary implementing partner will be a UN agency or an NGO with specialized expertise in GBV and CSEA and a strong, long-term presence in Kenya. Upon further analysis, IFC opted to partner with two organizations to draw directly on the deep, field-tested expertise of each in their respective focus areas: GBV and CSEA. As such, IFC elected to engage and commence negotiations with both United Nations Population Fund (UNFPA) and the United Nations Children’s Fund (UNICEF) as implementing partners. UNFPA is the lead agency for efforts to prevent and respond gender based violence in the UN system, while UNICEF is the lead agency for child protection, including the prevention of child sexual exploitation and abuse. Together, these partners bring the necessary expertise, diverse networks and the capacity to implement the Program in accordance with IFC’s requirements. Each will oversee a network of service delivery organizations to deliver a comprehensive, credible, and high-quality program.
10. **Legal Agreements:** Grantmaking is an exceptional activity at IFC and processed in accordance with the requirements of the IFC Grants Directive and Grants Procedures, including an assessment of risk and budget allocation for any proposed grants from IFC to third parties. The two grants - to UNFPA and UNICEF as implementing partners of the Program - were approved by IFC Management on January 28, 2026, in accordance with IFC policy. IFC is presently working with the implementing partners to negotiate the conditions of the Grant agreements. This process is ongoing and Program implementation is expected to commence in May 2026 instead of February 2026 as anticipated in the July 2025 Management Progress Report.
11. **Direct Support to Bridge Complainants:** Since March 2025, IFC has provided direct support to the four Bridge complainants through a local GBV service provider, with case managers providing services tailored to their needs. The support offered by the GBV service providers includes medical care, psychosocial support and access to economic empowerment opportunities. IFC receives regular anonymized reports on the services provided and is covering the associated costs. IFC is aware that current support is focused on economic empowerment assistance. The assistance being provided to the four complainants is consistent with the package of services that will be available through the Kenya GBV and CSEA Response and Prevention Program. Any additional survivors who come forward will receive a similar level of support through the Program. The direct support offered to the four Bridge complainants allows them to access the assistance they need without further delay, while the Program is being operationalized.

12. **Stakeholder Engagement:** Since July 2025, IFC held discussions on the Program with the Kenyan Government-led National GBV Technical Working Group. The Program will be formally presented to members of the Technical Working Group for their information in Q3 FY26. During Fall 2025, IFC engaged with ActionAid, International Rescue Committee, and Plan International to gain a more detailed understanding of their operations and reach in Kenya. These organizations are among the leading GBV and CSEA service providers globally, and their insights helped IFC plan the Program's implementation stage.
13. **Engagement with the four CSOs representing the Bridge complainants:** Since May 2024, IFC has worked closely with the four CSOs representing the Bridge complainants, meeting 15 times. In the reporting period, IFC has met with the four CSOs on three occasions (September and October 2025 and February 2026). In its meetings with the CSOs, IFC, amongst other things, shared and sought input on drafts of the program design, shared updates on support to the four complainants, and discussed implementation plans for the Program.¹ These frequent engagements enabled the perspectives of the four Bridge complainants and relevant education stakeholders to be incorporated into the final design of the Program, and reflects IFC's commitment to transparency throughout the program development process.

CSO Letter: On November 25, 2025, the CSOs published a letter acknowledging IFC's engagement and expressing support for the program's design objectives. The letter raised concerns regarding the program's duration, the absence of compensation for Bridge survivors, the limited focus on identifying additional Bridge survivors, and remarked they were not clear on the Advisory Committee's role during the program implementation stage. IFC has clarified the first three points and highlighted their treatment in its July 2025 Progress Report (which included the Program design). This included: explaining IFC does not believe financial compensation payments by IFC are appropriate in this case because, as a minority investor with no operational control, IFC is not a guarantor of E&S outcomes nor can it be an insurer of remedy costs, particularly in cases involving harm caused by criminal actions of individuals outside of IFC, which fall under the jurisdiction of the Kenyan criminal justice system; outlining changes to the planned three-year program duration to include a commitment to review results and remain open to extending the Program as appropriate; and describing the dedicated, safe, and ethical outreach activities aimed at enabling other survivors from a Bridge school to be informed about the program and its available services, and connect to local partners on the ground who provide those services. IFC anticipates that the Advisory Committee will continue to play an important role throughout Program implementation, supporting IFC to administer the program through the provision of technical advice (for example, by providing guidance on the Program's outreach strategy; reviewing the indicators and exit milestones proposed by the implementing partners; assessing the safeguarding systems proposed by local partners; and providing guidance on sustaining the cohesion between prevention and response activities) as required.

14. **Collaboration with other Shareholders:** IFC explored partnering with other investors in Bridge International Academies on the Kenya GBV and CSEA Response and Prevention Support Program. While they are mostly supportive of the program, none have committed to contributing financially.¹

¹ IFC met with the CSOs virtually on May 28, September 11, October 3, October 15, and October 22, 2024, and January 16, February 7, April 3, April 24, June 10, July 22, September 24, October 9, 2025, and February 5, 2026. In-person meetings were held in Nairobi on July 29, 2024, and February 7, 2025.

Workstream B: Strengthening Management of GBV/CSEA Risks in IFC's Investments

15. **Institutional Strengthening Actions:** In the reporting period, IFC continued the process of strengthening internal capacity to manage GBV and CSEA risks in its portfolio. This included the development of additional training materials, the preparation of guidance for staff and clients, and the facilitation of training sessions. The activities are outlined in more detail in the following paragraphs.
16. **Child Safeguarding GPN and Training:** (item C.4 in MAP) IFC engaged a specialist consultancy on GBV to develop a Good Practice Note (GPN) on Child Safeguarding in the Private Sector (<https://www.ifc.org/en/insights-reports/2025/addressing-child-safeguarding-in-the-private-sector>). Following peer review, including feedback from the Advisory Committee, the GPN was published in December 2025. Dissemination began immediately, starting with an external webinar in January 2026 that drew over 150 private sector participants. That same month, IFC also held staff training sessions on the GPN. Child safeguarding training for staff continues alongside the annual E&S training program on GBV and child protection and will remain a recurring activity.
17. **Review of GBV and Child protection risks in IFCs portfolio:** (item C.1 in MAP) The IFC Portfolio Review has been completed, and an anonymized confidential summary report was shared with CAO in July 2025. The portfolio review sought to identify GBV child protection risks in IFC's investments and determine appropriate risk management measures. Led by the regional GBV specialists, IFC screened its entire active investment portfolio and selected a sub-group of investments in sectors with higher gender-based violence and child protection risks for in-depth review. This review, done in phases, included desk-based analysis reviews and client surveys to identify projects requiring focused GBV and child protection follow-up supervision and monitoring visits. All site supervisions have been completed, and corrective action plans have been agreed with the clients where needed and are under implementation.
18. **Client reporting obligations:** (Item C2 in MAP) In March 2025, IFC updated its investment covenants to include clear client obligations for anonymized reporting of SEAH and child protection incidents, as well as requirements for establishing sexual harassment policies. To support the implementation of these client reporting and policy obligations, IFC continues to deliver staff training. A total of 12 training sessions were conducted since the July 2025 progress report, reaching more than 750 staff. Additional project-specific guidance on the reporting requirements has been provided to E&S specialists and investment officers, on a case-by-case basis.
19. **New Tools and Training for IFC staff:** (Item C4 in MAP) To strengthen internal capacity and promote the uptake of good international practices, IFC increased messaging and awareness of GBV and child protection risks, reinforcing prompt reporting to enable timely, survivor-centered responses. During the reporting period, IFC finalized and began implementing new GBV prevention and response tools, along with the ongoing development of an institutional GBV and child safeguarding training curriculum for IFC investment and E&S staff, including managers. Training materials have been prepared and are being finalized for regional GBV consultant workshops that will train a roster of local experts and enhance their capacity to support companies in preventing and addressing GBV and child protection risks.
20. **Staff Statement on Addressing GBV and Child Protection Concerns with a Zero Tolerance Approach:** (Item C.5 in MAP) In 2025, IFC introduced a new internal protocol in the E&S Review Procedures defining staff responsibilities for reporting and managing significant adverse E&S events, including sexual exploitation, abuse, harassment, and child protection incidents. The protocol provides clear escalation procedures to senior management when necessary. The GBV team offers guidance for implementation of a survivor-centered approach and for monitoring cases involving sexual exploitation,

abuse, harassment, and child protection incidents through to closure. As part of these initiatives, IFC is strengthening staff and client capacity on survivor-centered GBV investigation processes and is working on fine tuning the existing incident reporting protocol for managing such incidents. The World Bank Group President and IFC's Managing Director both emphasized through email to staff the importance of timely escalation and the measures taken to better equip operational teams to handle sensitive cases and IFC's ongoing commitment to zero-tolerance for gender-based violence, child sexual abuse, or abuse of any kind.

21. **Advisory Committee:** (Item E1 in MAP) As noted in previous progress reports, IFC formed an independent Advisory Committee which commenced meetings in August 2024. In this reporting period, the Advisory Committee reviewed the Child Safeguarding Good Practice Note that was published in December 2025. Previously, the Advisory Committee reviewed the program design, providing valuable input to the final Program design. The implementation stage will necessarily entail a different role for the Advisory Committee as the focus shifts from designing to implementing the Program. We anticipate restructuring the Advisory Committee to ensure it is providing targeted, technical input on areas such as effective information-sharing, strengthening coordination between prevention and response, and enhancing survivor outreach.

III. UPDATE ON MAP ACTIONS

22. The following table contains current information on the two workstreams of the MAP – developing the Kenya GBV and CSEA Response and Prevention Support Program; and strengthening management of GBV and child protection risks in IFC's investments. The table includes updates on the deliverables and their implementation status.

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
Workstream A: IN-COUNTRY REMEDIATION AND PREVENTION PROGRAM			
<p>A. Remediation for survivors of child sexual abuse.</p>	<p>Action A.1. IFC will directly fund a remediation program (subject to design, evaluation, and milestones) – referred to by CAO as emergency child protection response (ECPR) – for survivors of child sexual abuse in counties where Bridge operated or currently operates in Kenya.</p> <p>..... Responsibility: IFC/ Implementation partner</p>	<p>A.1.a. Project Preparation Plan for the design phase Stakeholder engagement / community consultation plan The stakeholder engagement plan will be survivor-centered and will include a protocol on safe and ethical consultation with survivors of child sexual abuse, should they wish to participate. Mapping / Service-gap analysis Situational analysis Selection of implementation partner/s Implementation plan Logistics plan Timeframe: 6 months from the start, subject to the required (including government) approval process</p>	<p>Status: UN consultations, held in two stages, have been completed.</p> <p>..... Service mapping completed in FY24; desk review and situational analysis completed in FY24; consultation implementation partners selected in accordance with World Bank Group procurement policies (UNFPA and UNICEF); a comprehensive stakeholder engagement implementation plan completed in Q1 FY25. The consultation findings informed the program design. Program presented to the Board on July 30, 2025. Ongoing: Since Mar 2025, IFC has provided direct support to the four Bridge complainants through a local GBV service provider.</p>
		<p>A.1.b. Implementation Technical guidance materials Service protocols Information, education and communications materials Timeframe: Over the lifespan of the program</p>	<p>Technical guidance materials related to stakeholder consultations completed in Q1 FY25. Other program resource materials will be developed after engagement of the program implementing partners, during the startup phase of the new program commencing in Q4 FY26.</p>
		<p>A.1.c. Results Framework Timeframe: FY25 <i>Mid-term review - FY26/27</i> <i>Final evaluation - FY27</i> <i>(indicative dates to be adjusted based on the final design of the program)</i></p>	<p>The results framework will be developed after the program design is operationalized together with the selected implementing partners and is expected to be part of the first phase of program implementation in Q4 FY26.</p>
		<p>A.1.d. Sustainability, Transfer and Exit Strategy Transition /exit plan Timeframe:</p>	

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
		<i>Midterm review - FY26/27</i>	

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
<p>B. Strengthening community response to child sexual abuse and GBV against children within project communities.</p>	<p>Action B.1. Design “prevention” activities aiming to engage local communities and services in counties in Kenya where Bridge operated or currently operates, to strengthen prevention and outreach to populations at risk of child sexual abuse and GBV. Prevention interventions will be contextually adapted to the local context and designed via participatory methods in accordance with evidence-based good practices.</p> <p>Responsibility: IFC/ Implementation partner</p>	<p>B.1.a. Plan of Action: Outline of prevention interventions using participatory methods Timeframe: FY26</p>	<p>The consultation findings informed the prevention component of the program, which was finalized as part of the Kenya Response and Prevention Support Program in July 2025 (completed).</p>
		<p>B.1.b. Training of community facilitators/mentors Timeframe: FY26</p>	
		<p>B.1.c. Implementation (as outlined in Action A.1) Timeframe: Over program lifecycle</p> <p>Timelines as per Action A.1. <i>(indicative dates to be adjusted based on the final design of the program)</i></p> <p>Implementation Plan - FY26 Mid-term review - FY27 Final evaluation - FY28 Transition /exit plan: Subject to review in FY27/28</p>	

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
Workstream B: INSTITUTIONAL STRENGTHENING			
<p>C. Portfolio review to identify all projects where children are a vulnerable and disadvantaged subset of affected communities to identify and assess if appropriate social risk management measures are in place and operationalized.</p>	<p>Action C.1. Undertake a review of its portfolio to identify child sexual abuse and GBV risks in investments and determine appropriate risk management measures when needed. Responsibility: IFC</p>	<p>C.1.a. Summary Report Note: Report will be for internal IFC use only and shared with CAO on a strictly confidential basis. Progress under the portfolio review will be included in the first progress report on MAP implementation, presenting summarized results in a way compliant with the Access to Information Policy. Timeframe: Q2 FY25</p>	<p>Status: Completed The portfolio review has been finalized. IFC shared an anonymized confidential summary report with CAO in July 2025.</p>
	<p>Action C.2. Review the E&S provisions included in template investment agreements and develop covenants to be included where appropriate in relation to (i) prevention of GBV and child safeguarding / child protection measures for inclusion as relevant where the risk is identified during due diligence; and (ii) notification by clients to IFC of GBV and child safeguarding incidents. Responsibility: IFC</p>	<p>C.2.a. Updated investment agreement templates. Timeframe: FY25</p>	<p>Status: Completed – March 2025 IFC updated legal covenants in investment agreement templates with SEAH, child protection incident reporting, and sexual harassment policy obligations for new investments. Staff have been trained. The investment agreement templates with the new covenants were introduced in the first week of March 2025.</p>
	<p>Action C.3. Update existing gender and GBV project risk screening methodology and relevant guidance to E&S specialists to (i) include child protection risk screening; (ii) digitalize the tool to facilitate systematic usage by project team; (iii) increase functionality to enable systematic dashboard monitoring and follow up with project team; and (iv) strengthen systematic and mandatory implementation of a risk-based approach regarding GBV and child sexual abuse prevention and response during E&S due diligence and portfolio monitoring throughout the project cycle. Responsibility: IFC</p>	<p>C.3.a. Updated gender and GBV project risk methodology to include child protection. Actions on GBV and child sexual abuse methodology, digitalization, and guidance. Timeframe: Q1 FY25</p>	<p>Status: Completed/Q1 FY26 GBV project risk screening methodology and accompanying guidance for E&S specialists have been updated to include child protection risk screening. In August 2024, the GBV Risk Screening tool and GBV questionnaire for direct investments were integrated into the ESG platform – ESG360. This integration will enable systematic identification and management of GBV/child safeguarding risks throughout the project cycle. Contextualization of the GBV Risk Screening tool and GBV questionnaire targeting FIs have been developed for rollout.</p>

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
			A dashboard to enable monitoring and follow-up by the GBV team was developed and became operational in Q1 FY26.
	<p>Action C.4. Review and update E&S due diligence questionnaires and reporting templates (such as the annual monitoring report) to explicitly include child sexual abuse (GBV is already included) and systematic reporting of any GBV and child safeguarding incidents. The questionnaires and the reporting templates will explicitly specify reporting to be survivor-centered, confidential and child-sensitive.</p> <p>..... Responsibility: IFC</p>	<p>C.4.a. Updated questionnaires and annual monitoring templates to include child safeguarding.</p> <p>..... Timeframe: Q1 FY25</p>	<p>Status: Completed - Q1 FY25</p> <p>..... GBV questionnaires and annual monitoring templates have been updated to include child safeguarding. Additional guidance and training accompanied the rollout for E&S specialists.</p>
	<p>Action C.5. Issue and operationalize a statement to staff on zero tolerance for inaction on or reprisals relating to addressing GBV or child protection issues.</p> <p>..... Responsibility: IFC</p>	<p>C.5.a. Statement</p> <p>..... Timeframe: FY24</p>	<p>Status: Completed – FY24 and operationalization in June 2025</p> <p>..... Message from Ajay Banga to World Bank Group staff, “Learning from Mistakes” and from Makhtar Diop on “Bridge: The Work Ahead” IFC updated its E&S Review Procedures (ESRP) with step-by-step guidance on how to respond to significant adverse E&S events in January 2025.</p>

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
<p>D. Undertake institution-wide capacity building efforts to prevent child sexual abuse and overlapping forms of GBV from occurring in its investment projects.</p>	<p>Action D.1. IFC will anchor its activities to address GBV, including child sexual abuse in Kenya, through the hiring of a GBV specialist and collaboration with the Nairobi-based World Bank specialists. Additional GBV specialists will be recruited in Asia, Latin America and Middle East/Central Asia/Europe. Staff positions will be complemented by experts under short-term contracts.</p> <p>Responsibility: IFC</p>	<p>D.1.a. Increase GBV specialist staffing</p> <p>Timeframe: Q4 FY24</p>	<p>Status: Completed - August 2024</p> <p>Current in-house GBV expertise (one global GBV lead) has been enhanced with five regional GBV specialists (two in Africa, one in Latin America, one in Middle East/Central Asia/Europe, and one in Asia). All staff are onboard. In addition, a Senior Child Protection Consultant was hired.</p>
	<p>Action D.2. IFC will deliver the following capacity building actions:</p> <ul style="list-style-type: none"> • Develop and deliver an ongoing mandatory training and sensitization program for all IFC staff with project responsibilities, including materials contextualized for sectors and regions as needed, to build capacity in identifying and addressing child sexual abuse and GBV risks in IFC projects. This also involves leadership commitment to ensure capacity building efforts are systematized institutionally. • To support clients and the promotion of good practices, IFC will roll out its regional external GBV specialist consultant competency-based program and roster so that a pre-identified network of local GBV consultants is available at country and regional levels. <p>Responsibility: IFC</p>	<p>D.2.a. Annual training plan</p> <p>Timeframe: Q1 FY25</p> <p>D.2.b. Regional external GBV consultants' workshops</p> <p>Timeframe: FY25</p>	<p>Status: In Progress / FY26</p> <p>D.2a. - The annual training plan which includes mandatory training for IFC staff is completed. Development of institutional training curriculum for investment and E&S staff and managers is ongoing and resources and implementation will be rolled out in FY26/FY27 on a recurring basis.</p> <p>In addition, several training sessions have already taken place:</p> <p>Staff: Training on child safeguarding for staff took place in April, October, and November 2024 and again in 2025 and in 2026 following the publication of the Child Safeguarding GPN. This complements recurring annual E&S training on GBV/SEAH and child safeguarding.</p> <p>FI Clients: Two GBV awareness raising webinars for FI clients took place in March 2024, regional trainings for FI staff in July and Oct 2025, client training in Feb 2026 and are continuing under the</p>

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
			<p>planned corporate training program. In addition, GBV resources have been published on IFC’s FIRST website for FI clients.</p> <p>D.2.b. - In Progress: IFC has finalized the resource and training package and completed the pilot of the first regional training for the IFC regional external GBV specialist consultant program. The new regional GBV specialists were briefed on this deliverable and will receive a train-the-trainer course to equip them to roll out the training across regions in FY26.</p>
	<p>Action D.3. IFC will develop the following tools and guidance:</p> <ul style="list-style-type: none"> • A Good Practice Note on Child Safeguarding in Business for external publication, harnessing IFC’s standard-setting influence across multilateral financial institutions and in the marketplace. The Note will take an intersectional approach inclusive of the multiple vulnerabilities and sources of discrimination that should be considered (e.g., age, gender and sexual orientation, disability). • Launch an IFC GBV Company Diagnostic Tool to support implementation of the Good Practice Note: Addressing GBV and Harassment: Emerging Good Practices in the Private Sector. • Provide guidance to IFC Nominee Directors, using the Tip Sheet: Guidance for Boards of Directors on Overseeing Gender-Based Violence and Harassment Risk. 	<p>D.3.a. Good Practice Note on Child Safeguarding in Business Timeframe: FY25</p> <p>D.3.b. GBV Company Diagnostic Tool Timeframe: FY25</p> <p>D.3.c. Guidance to IFC Nominee Directors Timeframe: FY24 and ongoing for new Nominee Directors as they join</p>	<p>Status: Completed/ Q4 FY26</p> <p>D.3.a. - The new Good Practice Note on Child Safeguarding in Business was published in Dec 2025 with dissemination webinars in Jan 2026..</p> <p>D.3.b. - In Progress Significant research and technical content development for the company GBV diagnostic tool — including extensive consultations and integration of child protection components — culminated in the initial user testing phase of the Diagnostic Tool. This testing identified issues requiring content revisions and systems redevelopment. A second round of user testing is planned to validate the revisions. The launch is now anticipated by mid 2026.</p> <p>D.3.c. – Completed; Since October 2023 new IFC Nominee Directors receive</p>

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
	<p>.....</p> <p>Responsibility: IFC</p>		<p>guidance on E&S risk review. The first two targeted training sessions on GBV Risk Governance for Nominee Directors took place in January and June 2024. These are now occurring at every new intake of directors and are followed by an annual refresher. The IFC Guidance for Boards of Directors on Overseeing GBVH was distributed.</p>

Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
<p>Establish a global GBV task force to advise IFC on strengthening its approach to identifying and managing GBV across its investments, including supporting the implementation of the recommendations detailed above.</p>	<p>Action E.1. IFC will set up an Advisory Committee including relevant international and local GBV and child protection experts, both external and internal, to support the design and implementation of the Remediation and Prevention Program in Kenya, and the development of the Good Practice Note on Child Safeguarding in Business.</p> <p>.....</p> <p>Responsibility: IFC</p>	<p>E.1.a. Advisory Committee in place and functioning.</p> <p>.....</p> <p>Timeframe: Q4 FY24</p>	<p>Status: Completed - August 2024</p> <p>.....</p> <p>Advisory Committee was launched on August 1, 2024, co-chairs were appointed, a work plan agreed, and a Secretariat established to support the Advisory Committee.</p>

IV. DISCLAIMER

The IFC Management Progress Report is provided in response to the Investigation Report of the Office of the Compliance Advisor Ombudsman (CAO) relating to complaints of alleged non-compliance by IFC with its Policy on Environmental and Social Sustainability in a project supported by IFC finance or investment.

The CAO administers IFC's accountability mechanism in order to address complaints by people affected by IFC supported projects. As noted in paragraph 9 of the IFC/MIGA Independent Accountability Mechanism (CAO) Policy, CAO has no authority with respect to judicial processes. CAO is not a judicial or legal enforcement mechanism, nor is CAO a substitute for courts or regulatory processes, and CAO's analyses, conclusions, and reports are not intended or designed to be used in judicial or regulatory proceedings or for purposes of attributing legal fault or liability.

Nothing contained in the IFC Management Progress Report (1) creates any legal duty, (2) asserts or waives any legal position, (3) determines any legal responsibility, liability or wrongdoing, (4) constitutes an acknowledgment or acceptance of any factual circumstance or evidence of any mistake or wrongdoing, or (5) constitute any waiver of any of IFC's rights, privileges or immunities under its Articles of Agreement, international conventions or any other applicable law. IFC expressly reserves all rights.

While reasonable efforts have been made to determine that the information contained in the reports is accurate, no representation or warranty is given as to the accuracy or completeness of such information. In preparing this report, IFC does not intend to create, accept or assume any legal obligation or duty, or to identify or accept any allegation of breach of any legal obligation or duty. No part of IFC's Management Progress Report may be used or referred to in any judicial, arbitral, regulatory or other process without IFC's express written consent.