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

November 2, 2026

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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

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I. MAP IMPLEMENTATION OVERVIEW

1. This Management Progress Report (MPR) 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, July 2025, and March 2026, as well as a July 2025 technical briefing to the Board.

2. The Board approved the Bridge-04 MAP on March 13, 2024, following CAO's investigation into IFC's former equity investments in Bridge-related education projects in Kenya. IFC exited its direct investment in NewGlobe Schools, Inc. in March 2022 while retaining indirect exposure through Learn Capital; following Bridge's establishment as an independent Kenyan foundation in February 2024, neither IFC nor Learn Capital has any exposure to Bridge. In August 2024, CAO merged four substantively related complaints received with the Bridge-04 compliance process.

3. The MAP comprises two workstreams: developing the Kenya GBV and CSEA Response and Prevention Support Program (the "Program") and strengthening IFC's management of GBV and CSEA risks across its investments. In July 2025, IFC briefed the Board on the Program's design, consultation process, and implementation plan. The Bridge-04 case continues to inform IFC's approach to safeguarding vulnerable populations and strengthening accountability and risk management. Pursuant to the Program design, the Program will be implemented by UN agencies selected as implementing partners using funding provided by IFC.

4. Following the presentation of the Program to the Board, IFC developed grant agreements to engage the UN agencies, UNFPA and UNICEF, selected as implementing partners for their specialized expertise in preventing and addressing GBV and CSEA, respectively. The grant memorandum was approved on January 28, 2026, and grant agreements with UNFPA and UNICEF were signed in April 2026.

5. The Program has moved into implementation following completion of the three-month inception period. Foundational activities began in July 2026, followed by operational delivery in August through ten national and local implementing partners providing response, prevention, and legal services.

6. Direct support to the four Bridge complainants continues in parallel.

II. MAP IMPLEMENTATION UPDATE

This report is arranged by the two workstreams outlined in the MAP: Workstream A, implementation of the 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.

This section provides an update on progress in implementing the Bridge-04 MAP since the March 2026 MPR, including information regarding expected exit milestones, relevant indicators, and the timeframe for assessing Program progress. Program implementation commenced in May 2026 with a three-month inception phase, followed by operational delivery beginning in August 2026. The mid-term assessment is expected to be conducted after Year 2 of Program implementation concludes in April 2028.

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

7. **Legal Agreements:** IFC provided grants to UNFPA and UNICEF. 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. Following IFC Management approval, the grant agreements setting forth the terms and conditions by which IFC will fund the Program through grants to UNFPA and UNICEF, respectively, were negotiated between February and March 2026 and executed in April 2026.

8. **Program implementation:** Following signature of the grant agreements, the Program entered a three-month inception stage, during which UNFPA and UNICEF established the operational and governance framework for the Program.

   The Program will prioritize 14 counties based on the following factors: Bridge International Academies' documented footprint; GBV and CSEA prevalence and risk; partner capacity; access to referral pathways and essential health, psychosocial, legal, and child-protection services; and avoidance of duplication. To enable service delivery in all counties where Bridge schools are operating or operated at the time of IFC's investment, referral pathways will also serve survivors from neighboring counties. UNICEF's existing field offices in Kisumu, Garissa, and Lodwar, Turkana (which are not funded by the Program), will complement these arrangements. Digital platforms supported by the Program will further extend access to services nationwide.

   Implementation began in July 2026 and moved into operational delivery in August. UNFPA and UNICEF reported that agreements with local service providers, together with related workplans and budgets, have been finalized and the first tranche of sub-grants disbursed. Survivor services, including legal aid, are now operational through several local service providers. Local prevention partners have also established trainers, facilitators, CSEA Champions, and community structures needed to deliver prevention activities.

   Outcome indicators, exit milestones, and assessment of a possible Program extension: A joint Results Framework establishes reporting by UNFPA and UNICEF to IFC against annual and three-year targets for the results the Program is expected to achieve for survivors, service providers, and communities. Given that the Program supports existing service providers and ongoing GBV/CSEA prevention initiatives, exit milestones will establish closure or transition plans for survivors receiving case management services and continuity of supported prevention practices. Specifically, exit milestones include (i) consent-based closure or transition plans for all active survivor cases; (ii) UNFPA's and UNICEF's local partners meet safeguarding, grievance, case-management, data-protection standards and business sustainability metrics; (iii) trained youth champions and community gatekeepers able to maintain referral of survivors and delivery of prevention messaging, with continued access to nationally hosted resources; and (iv) consolidated results and lessons captured, with UNFPA's and UNICEF's local partners able to independently track survivors and service quality.

   These KPIs and exit milestones were finalized with support of the Bridge-04 Advisory Committee at a meeting in September 2026. The Committee helped refine the milestones and KPIs to better measure progress. Moreover, after the second implementation year, IFC will assess progress and the feasibility of meeting the Program's exit milestones to determine whether an extension of grant funding is necessary and, if so, its scope and duration. IFC Management will engage with the Board at the Year 2 decision

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point.

9. **Direct Support to Bridge Complainants**: Since March 2025, IFC has provided direct support to the four Bridge complainants through local GBV service providers. A case manager has been assigned to each complainant, who coordinates tailored assistance based on individual needs. This support includes medical care, psychosocial services, economic empowerment opportunities, and financial assistance to access these services, consistent with the scope of assistance to be available to any survivor through the IFC-funded Program. All four complainants receive in-person group and individual counseling sessions and have now enrolled in schools of their choice and commenced their training programs.

10. **Engagement with the four CSOs representing the Bridge complainants:** Since May 2024, IFC has held 18 meetings with the four CSOs representing the Bridge complainants. During the reporting period, discussions focused primarily on the support provided to complainants, including updates on available services and follow-up on issues raised by the complainants to their CSO representatives. Specific topics included the transition to a new economic empowerment service provider, the complainants' role in applying to training institutions, support for childcare while complainants attend classes, and funding available to access services.

11. **Stakeholder Engagement:** Since July 2025, IFC has engaged with the Government of Kenya-led National GBV Technical Working Group (TWG). In April 2026, IFC formally presented the Program to members of the TWG. The TWG is a national platform established by the President. It consists of 42 members from government ministries, civil society, and development agencies and is tasked with consulting stakeholders, reviewing legal and policy frameworks, and recommending measures to strengthen Kenya's response to GBV, including femicide. The presentation was organized to keep TWG informed about the program, following their earlier input on GBV and child protection needs in Kenya.

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

12. **Institutional Strengthening Actions:** During the reporting period, IFC continued to institutionalize measures for managing GBV and CSEA risks across its investment operations. Progress focused on embedding processes developed through completed MAP actions into regular practice and advancing ongoing work on staff capacity, operational guidance, and client and project support, as detailed below.

13. **Child Safeguarding GPN and Training:** (item C.4 in MAP) Status: Completed. As reported previously, IFC published the Child Safeguarding Good Practice Note in December 2025 and initiated its dissemination and related staff training. During the reporting period, child safeguarding training continued as part of IFC's recurring annual E&S training program on GBV and child protection.

14. **Review of GBV and Child protection risks in IFCs portfolio:** (item C.1 in MAP) Status: Completed. As reported previously, IFC completed the portfolio review and shared an anonymized confidential summary report with CAO in July 2025. All identified site supervisions have been completed, and corrective action plans agreed with clients where needed are under implementation. Supervision of projects continues as part of regular regional supervision plans.

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15. **Client reporting obligations:** (Item C2 in MAP) Status: Completed. As reported previously, IFC updated its investment covenants in March 2025 to include client obligations relating to anonymized reporting of SEAH and child protection incidents and sexual harassment policies. These provisions are now part of ongoing practice for relevant investments, supported by recurring staff training and project-specific guidance to E&S specialists and investment officers, as needed.

16. **New Tools and Training for IFC staff**: (Item C4 in MAP) Status: In Progress. During the reporting period, IFC continued rolling out its GBV prevention and response tools and advancing the institutional GBV and child safeguarding training curriculum for investment and E&S staff, including managers. Training materials for the regional GBV consultant program are being finalized, and workshops to build a roster of local experts able to support clients will be held by the end of Q2 FY27.

17. **Staff Statement on Addressing GBV and Child Protection Concerns with a Zero Tolerance Approach**: (Item C.5 in MAP) Status: Completed. As described in the previous Management Progress Report, IFC issued and operationalized the staff statement and supporting protocol on timely reporting, escalation, and survivor-centered management of GBV and child protection concerns. The protocol remains in effect as part of IFC's ongoing procedures and institutional commitment to zero tolerance for inaction or reprisals.

18. **Advisory Committee:** (Item E1 in MAP) As noted in previous progress reports, IFC established an independent Advisory Committee, which began meeting in August 2024. During this reporting period, the Committee met virtually with IFC in March and July to discuss the Program's transition to implementation and the corresponding evolution of its role. This was further considered at an in-person meeting in Kenya in September 2026. Having provided valuable input and guidance during program design, the Committee was now restructured to provide targeted technical advice during implementation, including on effective information-sharing, stronger coordination between prevention and response, enhanced survivor outreach, and helping IFC identify gaps, risks, and opportunities for the Program, recommending actions for emerging risks.

19. The Committee also reviewed the proposed KPIs and exit milestones that UNFPA and UNICEF will report against to IFC. The Committee recommended a more outcome-focused KPIs and exit framework, with clearer multi-year targets and stronger measures of service quality, coordinated referrals, safeguarding, prevention outcomes, and sustainable Program close-out. The revised framework incorporates the elements considered practical and feasible, including milestones for the safe transition or closure of active survivor cases, sustained institutional and community capacity, continued use of Program data and learning, and sustainability planning by local service providers. Based on the Committee's advice, progress and the continued appropriateness of the exit milestones will be reviewed at the end of Year 2 and adjusted if needed.

III. UPDATE ON MAP ACTIONS

20. 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.

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Area of Improvement	Action / Activity & Responsibility	Deliverable/Expected Outcome & Timeframe	Summary of Implementation Status
Workstream A: IN-COUNTRY REMEDIATION AND PREVENTION PROGRAM			
A. Remediation for survivors of child sexual abuse.	**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. **Responsibility:** IFC/ Implementation partner	**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	**Status:** UN consultations, held in two stages, have been **completed**. 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.
		A.1.b. Implementation Technical guidance materials Service protocols Information, education and communications materials **Timeframe:** Over the lifespan of the program	Technical guidance materials related to stakeholder consultations **completed** in **Q1 FY25**. Other program resource materials were developed during the Program inception stage and **completed** in **Q1 FY27.**
		A.1.c. Results Framework **Timeframe:** FY25 ***Mid-term review -*** FY26/27 ***Final evaluation -*** FY27 *(indicative dates to be adjusted based on the final design of the program)*	The results framework developed together with the selected implementing partners (UNFPA and UNICEF) and **completed** in **Q1 FY27.**
		A.1.d. Sustainability, Transfer and Exit Strategy Transition /exit plan **Timeframe:** ***Midterm review*** - FY26/27	

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B. Strengthening community response to child sexual abuse and GBV against children within project communities.	**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. **Responsibility:** IFC/ Implementation partner	**B.1.a. Plan of Action:** Outline of prevention interventions using participatory methods **Timeframe:** FY26	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**).
		B.1.b. Training of community facilitators/mentors **Timeframe:** FY26	
		B.1.c. Implementation (as outlined in Action A.1) **Timeframe:** Over program lifecycle ***Timelines as per Action A.1.*** *(indicative dates to be adjusted based on the final design of the program)* ***Implementation Plan*** **-** FY26 ***Mid-term review*** **-** FY27 ***Final evaluation*** **-** FY28 ***Transition /exit plan:*** Subject to review in FY27/28	

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Workstream B: INSTITUTIONAL STRENGTHENING			
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.	**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	**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	**Status: Completed** The portfolio review has been finalized. IFC shared an anonymized confidential summary report with CAO in July 2025.
	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	**C.2.a. Updated investment agreement templates.** **Timeframe:** FY25	**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. Regional training for IFC staff and project-level engagement with clients to support implementation of these clauses continue.
	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	**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	**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

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	monitoring throughout the project cycle. **Responsibility:** IFC		GBV Risk Screening tool and GBV questionnaire targeting FIs have been developed for rollout. A dashboard to enable monitoring and follow-up by the GBV team was developed and became operational in Q1 FY26.
	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. **Responsibility:** IFC	**C.4.a. Updated questionnaires and annual monitoring templates** to include child safeguarding. **Timeframe:** Q1 FY25	**Status: Completed** - Q1 FY25 GBV questionnaires and annual monitoring templates have been updated to include child safeguarding. Additional guidance and training accompanied the rollout for E&S specialists.
	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. **Responsibility:** IFC	**C.5.a. Statement** **Timeframe:** FY24	**Status: Completed** – FY24 and operationalization in June 2025 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.

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D. Undertake institution-wide capacity building efforts to prevent child sexual abuse and overlapping forms of GBV from occurring in its investment projects.	**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. **Responsibility:** IFC	**D.1.a. Increase GBV specialist staffing** **Timeframe:** Q4 FY24	**Status: Completed** - August 2024 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.
	Action D.2. IFC will deliver the following capacity building actions: • 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. **Responsibility:** IFC	**D.2.a. Annual training plan** **Timeframe:** Q1 FY25 **D.2.b. Regional external GBV consultants' workshops** **Timeframe:** FY25	**Status: In Progress** / Expected to be completed by 2Q FY27 **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 FY27 on a recurring basis. In addition, several training sessions have already taken place: ***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. ***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,

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			client training in Feb 2026 and are continuing under the planned corporate training program. In addition, GBV resources have been published on IFC's FIRST website for FI clients. **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 have received a train-the-trainer course to equipping them to roll out the training across regions in Q2 FY27.
	Action D.3. IFC will develop the following tools and guidance: • 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	**D.3.a. Good Practice Note on Child Safeguarding in Business** **Timeframe:** FY25 **D.3.b. GBV Company Diagnostic Tool** **Timeframe:** FY25 **D.3.c. Guidance to IFC Nominee Directors** **Timeframe:** FY24 and ongoing for new Nominee Directors as they join	**Status: Completed**/ Q4 FY26 **D.3.a. -** The new Good Practice Note on Child Safeguarding in Business was published in Dec 2025 with dissemination webinars in Jan 2026.. **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 has been completed to validate the revisions. The tool is now with the IT developer. The launch is now anticipated by end 2026.

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	Gender-Based Violence and Harassment Risk. **Responsibility:** IFC		**D.3.c.** – **Completed**; Since October 2023 new IFC Nominee Directors receive 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.

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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.	**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. **Responsibility:** IFC	**E.1.a. Advisory Committee in place and functioning.** **Timeframe:** Q4 FY24	**Status: Completed** - August 2024 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.

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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.

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