

SM Pasay 360 Project — Corporate ESMS Audit ESAP						
ESAP Ref.	Applicable Standard	Gap / Finding	Corrective Action	Responsibility	Evidence of Completion	Timing
1. ESS1 — Assessment and Management of Environmental and Social Risks and Impacts						
Policies and Frameworks						
ESAP-01	IFC PS1; ADB ESS1; AIIB ESS1; ILO Core Labour Standards; UNGPs; GIIP	The Environmental and Social Policy forms part of the ESMS Manual. It is endorsed by senior management and applies to SMSCIDC and its contractors. However, it contains no express commitments on labour and working conditions, human rights, biodiversity, climate change, Indigenous Peoples, cultural heritage, land acquisition and livelihoods, supply chain, and SEAH framework.	Revise the E&S Policy to incorporate express commitments on each of the requirements listed above, develop a SEAH framework, and obtain Board endorsement.	SMSCIDC	Revised E&S Policy	Next policy amendment period
ESAP-02	IFC PS1; ADB ESS1; AIIB ESS1; ILO Core Labour Standards; UNGPs; GIIP	The Environmental and Social Policy does not clearly cover everyone who has a role in the Project. The policy only says it applies to "contractors, subcontractors and service providers doing business with SMART CITY." This could be understood as excluding SMSCIDC itself, including its management, employees, consultants, suppliers, and other parties involved in planning and carrying out the project. Futhermore, under the Joint Venture Agreement (JVA), the Project Developer has broader responsibilities. These include financing the project, obtaining permits and approvals, managing and implementing not just the reclamation but also horizontal development works, sourcing filling materials, and carrying out stakeholder consultations.	Expand the scope statement to clarify that the E&S policy applies to SMART CITY, its management and employees, contractors, subcontractors, consultants, suppliers, service providers, and other entities involved in the project. It should also cover all project activities throughout the project lifecycle, as well as environmental and social impacts on workers, affected communities, and other stakeholders. This would be more consistent with the Project Developer's responsibilities under the JVA and ADB ESF expectations in connection to the use of proceeds (which include not just the construction but also the operations and maintenance).	SMSCIDC	Revised E&S Policy	Next policy amendment period
ESAP-03	IFC PS4; ADB ESS4; AIIB ESS1; Voluntary Principles on Security and Human Rights; UNGPs; WBG EHS Guidelines; GIIP	While the H&S policy refers to workers, contractors, visitors, project-affected persons, and communities, it does not explicitly state who and what the policy applies to.	Enhance the H&S policy to state that it applies to SMSCIDC, its management, employees, contractors, subcontractors, consultants, suppliers, and all project-related activities throughout the project lifecycle.	SMSCIDC	Revised Health and Safety Policy	Next policy amendment period
ESAP-04	IFC PS1; ADB ESS1; AIIB ESS1; GIIP	SMSCIDC applies SM Prime corporate frameworks where an ESMS element is not separately established. No register records which frameworks are formally adopted, the instrument of adoption, whether each is binding on SMSCIDC, the accountable SMSCIDC role, or the project-level procedure that operationalises it.	Update the ESMS to include a register of the SM Prime corporate frameworks SMSCIDC relies on, recording for each: (i) the instrument of adoption; (ii) confirmation that it is binding on SMSCIDC; (iii) the accountable SMSCIDC role; and (iv) the project-level procedure that applies it. Reference the register in the ESMS Manual and review it annually.	SMSCIDC and SM Prime	Updated ESMS with the adopted Corporate Frameworks Register	Prior to First Drawdown
Internal organisational capacity and competency						
ESAP-05	IFC PS1; ADB ESS1; AIIB ESS1; ISO 14001/45001; OECD Common Approaches; GIIP	Governance, organisational arrangements and dedicated E&S personnel are established, with E&S functions under Legal and Regulatory Compliance. However, E&S responsibilities and job descriptions are framed mainly around regulatory compliance. They do not cover the identification, assessment, management, monitoring and reporting of E&S risks and impacts required under the ADB ESF. There are gaps in social safeguards (economic displacement/livelihood restoration), biodiversity/marine ecology, climate change and resilience, E&S risks from filling material sources, suppliers and associated facilities, and lender E&S reporting. Key site-level health and safety functions (Safety Officer, Health Officer) sit with contractors, and owner-side oversight of contractor E&S/H&S performance is not defined. There is also no SEAH focal person.	Update the ESMS Manual and the job description to clearly define E&S roles and responsibilities that go beyond regulatory compliance and cover all applicable ADB ESF requirements, and establish clear owner-side accountability and oversight for contractor environmental, social, health, and safety performance. Appoint a Health and Safety personnel and a SEAH Focal Person at SMSCIDC level	SMSCIDC	Updated ESMS Manual containing the revised E&S roles and responsibilities, organizational chart and owner-side oversight arrangements for contractor E&S/H&S performance Updated Job Description for environment personnel Evidence of appointment of H&S personnel	Prior to First Drawdown
ESAP-06	ADB ESS1; IFC PS1; AIIB ESS1	ESS1 requires the borrower to maintain the internal organizational capacity and competency necessary to implement its ESMS, and for that capacity to scale with the borrower's risk exposure as its activities and project pipeline develop. SMSCIDC has existing training and awareness programmes, but the documents reviewed did not show a corporate-level E&S training needs assessment, a competency matrix, or a structured E&S training programme. Without these, there is no basis to demonstrate that SMSCIDC's E&S capacity is sufficient for its current risk profile or will scale as its activities grow. Identified competency gaps include social safeguards, biodiversity and marine ecology, and lender E&S requirements and reporting.	Conduct a corporate-level E&S capacity and competency assessment covering SMSCIDC's current and future activities, and implement its findings. Establish an E&S competency matrix and annual training programme covering applicable lender standards and priority E&S risks, with periodic review as SMSCIDC's activities and risk exposure change.	SMSCIDC	Capacity and competency assessment; E&S competency matrix; annual training plan;	Prior to First Drawdown

ESAP Ref.	Applicable Standard	Gap / Finding	Corrective Action	Responsibility	Evidence of Completion	Timing
1. ESS1 — Assessment and Management of Environmental and Social Risks and Impacts						
E&S risk identification, assessment and management planning – Due Diligence Processes						
ESAP-07	IFC PS1; ADB ESS1; AIIB ESS1; GIIP	Based on the ESMP document, E&S risk screening is undertaken through a combination of (i) a project-level screening template, (ii) identification of applicable E&S standards, and (iii) activity-based risk identification for the different project phases. The ESMP states that an environmental and social screening template was completed to assess potential risks and impacts associated with project activities and that the template was tailored to the requirements of international institutions such as ADB and IFC. The screening process appears to follow these steps: (i) review of project activities and lifecycle phases including pre-construction, reclamation, construction, operation, and abandonment; (ii) assessment of applicable safeguard standards by comparing ADB ESS and IFC Performance Standards and identifying which standards are triggered by the project; (iii) identification of activity-specific risks and impacts through project phase risk mapping, covering activities such as procurement, reclamation, material sourcing, marine works, and construction activities with corresponding environmental and social risks and the relevant E&S standards triggered; and (iv) Evaluation of E&S topics using the GEF Minimum Standards screening checklist (Annex 1); and (v) translation of screening results into management measures. However, the document primarily presents the results of the screening rather than a detailed methodology. The ESMP does not clearly explain how risk significance was evaluated, how the high and medium risk ratings were derived, how residual risks were assessed, or how screening conclusions were reached for certain topics such as biodiversity, economic displacement, community health and safety, and cumulative impacts. As a result, the ESMP demonstrates a screening process, but the methodology and justification behind several screening outcomes could be more fully documented to demonstrate alignment with the risk-based screening expectations of ADB ESS1.	Develop and incorporate into the ESMS a documented E&S screening procedure. Apply the screening before activities start and before contractors and suppliers are engaged. The procedures should cover: i) Screening against the ADB PIAL(Prohibited Investment Activities List) and other Lender's prohibited activities. ii) Categorisation of E&S risks and impacts. iii) Identification of applicable ADB ESSs iv) Assessment of direct, indirect and cumulative impacts and risks.	SMSCIDC	Updated and issued ESMS (signed and dated) with the E&S screening procedure	Within 6 months of First Drawdown
ESAP-08	IFC PS1; ADB ESS1; AIIB ESS1; GIIP	While several management plans have been prepared for key project activities, these plans are largely developed and implemented by the contractor. It is not yet clear how the SMSCIDC reviews, approves, supervises, and monitors these plans as part of an integrated Environmental and Social Management System (ESMS). The documentation also does not clearly demonstrate how the environmental and social risks identified during screening and assessment presented in the ESMPs are translated into specific management plans. Given that different contractors might be engaged across various phases of the project lifecycle, including reclamation, horizontal infrastructure development, and future development activities, it would be beneficial to establish a standardized ESMP template and minimum content requirements for all contractors. This would help ensure consistency in risk assessment, mitigation measures, monitoring requirements, reporting formats, performance indicators, and compliance with the ESMS.	Standardize ESMP template across assets in accordance with ADB ESF Annex A–2: Indicative Outline of an Environmental and Social Management Plan. The template should include specific descriptions and technical details of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits where appropriate, and definitions of thresholds that will signal the need for corrective actions; and monitoring and reporting procedures to ensure early detection of conditions that necessitate particular mitigation measures, and to furnish information on the progress and results of mitigation.	SMSCIDC	Standardized ESMP template document, developed in accordance with ADB ESF Annex A–2 (Indicative Outline of an Environmental and Social Management Plan), including defined monitoring parameters, methods, sampling locations, frequency, detection limits, and corrective-action thresholds; confirmation that the template has been issued to and adopted by current and future contractors Enhanced ESMPs for the remaining reclamation and coastal protection works	Prior to First Drawdown
	IFC PS1; ADB ESS1; AIIB ESS1; GIIP	The ESMS and ESMP include consideration of the operation and maintenance (O&M) phase and describe the anticipated institutional arrangements for managing the estate following project turnover. Information provided by SMSCIDC indicates that a dedicated Estate Association will be established for Pasay 360, with SM SCIDC expected to undertake estate-level operational and administrative functions and maintain oversight of applicable environmental and social requirements during the O&M phase. While these arrangements provide information regarding institutional accountability after project turnover, the current ESMS and ESMP remain largely focused on reclamation and construction activities. Detailed operational E&S risk assessments, management plans, monitoring programs, performance indicators, reporting requirements, and implementation procedures for the operation and maintenance phase have yet to be developed. Consequently, the O&M phase is conceptually addressed through proposed governance arrangements but is not yet supported by a fully developed operational E&S management framework consistent with the lifecycle approach required under ADB ESS1.	Develop and implement an O&M Environmental and Social Management Framework (or Operational ESMP) for the Estate Association that defines operational E&S risks and impacts, monitoring requirements, performance indicators, institutional responsibilities, reporting mechanisms, and compliance obligations applicable during the operation and maintenance phase. These should also clearly define the roles of the Estate Association, SM SCIDC, locators, and service providers in implementing and overseeing E&S requirements across the estate.	SMSCIDC	Operations ESMPs	¹ Prior to commencement of operations
Monitoring, reviewing and reporting						
ESAP-09	IFC PS1; ADB ESS1; AIIB ESS1; GIIP	The ESMS provides for ongoing monitoring of management programmes, functional audits of contractor plans and annual ESMS review. However, these arrangements are not consolidated into a structured E&S performance review process covering defined indicators and targets, ESAP implementation, corrective action and verified closure, and documented management review. ADB ESS1/GN1 requires monitoring results to inform preventive and corrective actions and updates to the ESAP and relevant E&S management documents	Revise the ESMS to establish an E&S Performance Monitoring and Management Review Procedure covering: (i) monitoring against defined E&S indicators, targets and thresholds; (ii) ESAP action tracking; (iii) corrective and preventive action tracking to verified closure; (iv) periodic management review with documented inputs, decisions and follow-up actions; and (v) use of monitoring and review results to update the ESMS, ESAP and relevant management documents, as required.	SMSCIDC	Approved E&S Performance Monitoring and Management Review Procedure; E&S performance dashboard; ESAP and corrective action tracker	Prior to First Drawdown
ESAP-10	IFC PS1; ADB ESS1; AIIB ESS1; GIIP	The ESMS Manual provides for internal audits and annual management review. However, no documented ESMS audit programme, audit schedule, completed internal audit records, or procedure for tracking audit findings and corrective actions to verified closure was identified. Contractor obligations are also not supported by a consolidated owner-side E&S audit programme.	Establish an ESMS audit programme defining audit scope, criteria, frequency, responsible and independent auditors, reporting and follow-up.	SMSCIDC	ESMS audit procedure and annual audit programme	Prior to First Drawdown

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1. ESS1 — Assessment and Management of Environmental and Social Risks and Impacts						
Stakeholder engagement, grievance mechanism, and disclosure						
ESAP-12	ADB ESS1/ESS10; IFC PS1; AIIB ESS1; ADB Access to Information Policy; IFC Stakeholder Engagement Good Practice Handbook; UNGPs; GIIP	Section 8 establishes stakeholder identification, impact/influence mapping, prioritisation and an iterative engagement process. However, it excludes concerns and complaints of settlers and property owners; does not define differentiated engagement measures for vulnerable groups; and does not clearly establish triggers and responsibilities for updating stakeholder analysis when project risks, impacts or stakeholder circumstances change, or for evaluating engagement effectiveness.	Revise Section 8 to remove the exclusion of settlers and property owners; provide differentiated engagement measures for vulnerable groups; define when and by whom stakeholder analysis and engagement arrangements are updated; and establish periodic evaluation of engagement effectiveness.	SMSCIDC	Updated ESMS Manual aligned with the stakeholder engagement procedure.	Prior to First Drawdown
ESAP-13	ADB ESS1 ; ADB ESS10 ; IFC PS1; AIIB ESS1	While the ESMS establishes periodic external reporting and minimum reporting content, it does not clearly establish requirements for communication with lenders, including responsibility, agreed reporting format and frequency, submission of required E&S monitoring reports, and prompt notification of significant E&S incidents. The arrangements also do not clearly link external reporting to ESAP implementation and corrective-action status. Under ADB ESS1/GN1, the borrower/client submits E&S monitoring reports to ADB for disclosure, with format, content and frequency agreed with ADB.	Revise the ESMS external communication provisions to incorporate lender communication requirements, including: (i) responsibilities for lender communication; (ii) periodic submission of E&S monitoring reports in the agreed format and frequency; (iii) reporting of ESAP and corrective-action status; and (iv) a protocol for prompt notification of significant E&S incidents.	SMSCIDC	Revised ESMS external communication provisions/procedure; lender reporting protocol and reporting schedule	Prior to First Drawdown
Emergency preparedness and response						
ESAP-14	IFC PS1/PS4; ADB ESS1/ESS4; AIIB ESS1; Philippine DRRM Act; WBG EHS Guidelines; GIIP	ESS4 requires the borrower/client to prepare an ERP in coordination with competent local authorities, disclose emergency preparedness arrangements to project workers and project-affected persons, and regularly review the ERP with ongoing training and collaboration. SMSCIDC's ESMS (Section 7.0) establishes the EPRP requirement but does not states clearly SMSCIDC's own coordination with local authorities, disclosure to affected communities, or a corporate mechanism for review and training support. The SMPHQ Emergency Response Manual contains corporate-level provisions for external emergency coordination and training, but its scope is limited to SMPHQ/Mall of Asia Annex Bldg. The EPRP scenario list in the ESMS Manual covers only 8 selected incidents; it omits fire, oil spill, flooding and storm surge as discrete scenarios, vessel collision and man-overboard, structural or bridge failure, medical emergencies, and unexploded ordnance. No drill calendar or defined frequency, community and agency notification protocol, or incident classification with regulator and lender notification timelines is established. No centralized SMSCIDC process exists to verify contractor implementation or track corrective actions.	Update the EPRP to (i) expand the scenario list to include fire, oil spill, flooding/storm surge, vessel collision/man-overboard, structural/bridge failure, medical emergencies, and unexploded ordnance; (ii) include named external responder contacts, notification thresholds, mutual-aid arrangements, a drill calendar, and community notification protocols; (iii) document SMSCIDC's coordination with competent local authorities and confirm how SMPHQ corporate emergency provisions apply to SMSCIDC. Establish a documented SMSCIDC process for verifying contractor emergency preparedness, evaluating drills, and tracking corrective actions.	SMSCIDC	Updated EPRP	Prior to First Drawdown
Contractor and Supplier Management						
ESAP-15	FC PS1; IFC PS2; IFC PS3; ADB ESS1; ADB ESS2; AIIB ESS1; OECD Guidelines for Multinational Enterprises; ILO Core Labour Standards; UNGPs; WBG EHS Guidelines; GIIP	Supplier and contractor management is implemented through centralised SM Prime procurement procedures, vendor accreditation and prequalification, the Supplier Business Code of Conduct, and contractor requirements. However, prequalification does not constitute a risk-based E&S due diligence framework. No systematic process was identified for E&S risk categorisation, differentiated due diligence, labour and human rights screening of higher-risk suppliers, ongoing supplier E&S performance monitoring, periodic audits, corrective action tracking, or ESG performance reporting.	Extend the Vendor Prequalification and Management Procedure to establish risk-based E&S due diligence for suppliers and contractors, including: (i) E&S risk categorisation based on scope, workforce profile and commodity; (ii) differentiated due diligence according to risk; (iii) labour and human rights screening for higher-risk suppliers, including ILO core labour standards and DOLE compliance; (iv) ongoing E&S performance monitoring; (v) periodic audits of higher-risk suppliers; (vi) corrective action tracking to closure; and (vii) contractual right-to-audit provisions.	SMSCIDC	Revised Vendor Prequalification and Management Procedure; supplier E&S risk register demonstrating categorisation of the current supplier base	Prior to First Drawdown
Legal and Regulatory Compliance						
ESAP-16	ADB ESS1; IFC PS1; AIIB ESS1	SMSCIDC maintains a register of statutory environmental obligations, and no significant regulatory non-compliance was identified. SMSCIDC has confirmed that lender environmental and social requirements will be included in the register. However, (i) no documented process periodically assesses changes in lender requirements and applicable international standards and incorporates them into the ESMS; (ii) partial-compliance items are not systematically tracked to closure, and legal compliance performance is not formally incorporated into management review; and (iii) litigation risk is not included in the compliance tracking framework.	Establish a periodic review and ESMS update process for changes in legal, lender and international E&S requirements; track identified compliance gaps to verified closure through the corporate corrective-action process and include legal compliance performance in management review; and include litigation risk in the compliance tracking framework.	SMSCIDC	Updated compliance register and procedure	Prior to First Drawdown

ESAP Ref.	Applicable Standard	Gap / Finding	Corrective Action	Responsibility	Evidence of Completion	Timing
1. ESS1 — Assessment and Management of Environmental and Social Risks and Impacts						
Climate Change						
ESAP-17	ADB ESS9/ESS1/ESS3; IFC PS1/PS3; AIIB ESS1; Joint MDB Methodological Principles (2023); TCFD/IFRS S2; WBG EHS Guidelines; GIIP	Climate governance, risk assessment and performance monitoring are established at SM Prime level through the Sustainability Policy, Energy Management Policy, Sustainability and Climate Risk Management Framework and ERM, with board oversight. Group commitments cover renewable energy, net-zero, GHG monitoring, water recycling and climate resilience. At project level, climate resilience is addressed mainly through engineering design, such as platform elevation, layout and channel configuration, and revetment and wave wall design based on typhoon and sea-level rise modelling. These are technical design responses, not elements of a climate management system. SMSCIDC has not translated the group climate commitments into its own ESMS. It has no climate objectives or performance indicators, and no defined GHG inventory boundary or Scope 1, 2 and 3 methodology. It has no adaptation measure register, and no process to monitor and report climate risks and adaptation measures through the ESMS. The corporate climate processes have also not been applied to the Project or to future financed components.	Establish SMSCIDC-level climate procedures within the ESMS that apply and monitor the adopted SM Prime commitments. They should include adoption, objectives and indicators, GHG inventory, climate risk and design criteria, adaptation register, and monitoring and review frequency.	SMSCIDC	Approved SMSCIDC climate procedure or ESMS climate section, with climate objectives and indicators GHG inventory methodology and boundary document, and a baseline inventory	Within 12 months of First Drawdown
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Notes:

1. Full conveyance to the Estate Association

SM Pasay 360 Project — E&S Compliance Audit ESAP					
ESAP Ref.	Gap / Finding	Corrective Action	Responsibility	Evidence of Completion	Timing
E&S Assessment and Management - ADB ESS1, AIIB ESS1, IFC PS1, EP4					
ESAP-01	No lender-aligned Cumulative Impact Assessment (CIA). Existing EIS/EPRMP cumulative assessments focus primarily on (hydrodynamic conditions, water circulation, flooding, storm surge, sediment transport, flushing, water quality, navigation, coastal processes. A DENR-EMB-commissioned cumulative assessment covering 21 Manila Bay reclamation projects (conducted by MERF) appears to underpin the 22 July 2026 ECC bridge amendment. The study is confirmed as not publicly accessible at this stage.	Prepare a Cumulative Impact Assessment (CIA) for the Pasay 360 Project, using the IFC rapid CIA approach as a guide, including the template terms of reference in its Appendix 3. This is not a full regional study. The CIA will: i) Identify the key environmental and social receptors likely to be affected by the Project together with other existing and reasonably foreseeable developments in the area. ii) Set spatial and temporal boundaries for the assessment. iii) Use existing information, baseline, publicly available data on nearby projects, and government planning information, without collecting new baseline data. iv) Assess the Project's contribution to cumulative effects on those receptors, and set out proportionate management monitoring measures.	SMSCIDC	Rapid CIA for Pasay 360 and Pasay 265	10 weeks
Labor and Working Conditions (ADB ESS2; AIIB ESS1; IFC PS2; ILO Core Labour Standards; Philippine Labor Code and DOLE Regulations; UNGPs; OECD Guidelines for Multinational Enterprises; GIIP)					
ESAP-02	Peak workforce estimates are provided in the EPRMP (approx. 1,200–1,500 for reclamation/horizontal works; 200–1,000 at peak bridge construction), but no current actual workforce composition, contractor/subcontractor breakdowns, sex-disaggregated data, or workforce completion schedules are available.	Establish a contractor workforce register covering size, composition (including local, migrant, and foreign workers, and sex-disaggregated data), peak levels, and demobilisation schedule. Update the register quarterly.	SMSCIDC / Contractors	Workforce register	Prior to First Drawdown
ESAP-03	The grievance mechanism reaches contractor personnel through multiple channels, including GRM boxes, supervisors, and toolbox meetings. However, the GRM boxes show zero submissions to date, and discussion during the E&S audit confirmed that worker concerns raised during toolbox meetings are not formally recorded - only attendance is documented, while the substance of any grievances or concerns raised is verbal only. As a result, the absence of recorded grievances cannot be treated as evidence that the mechanism is effective, since informally raised concerns are not captured, tracked, or demonstrably resolved. No periodic assessment of worker awareness or confidence in the mechanism has been conducted.	Cascade the Corporate GRM to CHEC	SMSCIDC / CHEC	Evidence of Cascade	Prior to First Drawdown
Health, Safety, and Security (ADB ESS4, AIIB ESS1, IFC PS4)					
ESAP-04	Evidence demonstrating implementation of the Emergency Response Plan training and drill requirements was not provided for review. The ERP requires emergency response training and periodic emergency drills/exercises, including offshore scenarios such as oil spill response, fire/explosion, MEDEVAC and man-overboard, and onshore scenarios such as fire, environmental spill, medical emergency, security incident, and earthquake/tsunami drills. The ERP also requires emergency-related records to be maintained. Aside from an earthquake drill report conducted at SM Prime Headquarters, no evidence of project-specific drills, exercises, training records, or emergency drill documentation was provided for verification.	The Contractor shall update the ERP to require the maintenance of training attendance records, drill/exercise evaluations, lessons learned, and corrective action tracking for all emergency drills and exercises. The Contractor shall prepare and submit to ADB a drill plan covering the remaining reclamation and coastal protection works, including relevant onshore and offshore emergency scenarios. At a minimum, one onshore drill and one offshore drill shall be conducted and documented. Records shall include the drill plan, attendance sheets, drill reports, evaluation results, lessons learned, and corrective action status to demonstrate implementation and continual improvement of emergency preparedness. Report on the implementation of drill plan to be included in the periodic Safeguards and Social Monitoring Report	SMSCIDC / Contractors	i) Updated ERP ii) Drill plan and Drill reports one onshore and offshore reports iii) Safeguards and Social Monitoring Report	i) - ii) Prior to First Drawdown iii) periodic report to ADB
ESAP-05	The H&S Manual (Section 27) describes site security arrangements and access controls, including a licensed third-party security provider, perimeter fencing, ID badges, visitor escort and gate control. No documented evidence was provided of (i) security personnel training on use of force, code of conduct, human rights, stakeholder interaction or incident management; (ii) a security risk assessment; or (iii) periodic performance evaluation or monitoring of the security provider.	i) Conduct a Pasay 360 Project Security Risk Assessment covering the site, personnel, contractors and community interfaces. ii) Establish and maintain training records for security personnel, covering human rights, conflict de-escalation, emergency response and stakeholder engagement. iii) Monitor and evaluate the contracted security provider periodically, and retain inspection, audit and review records. iv. Record, investigate and report security-related incidents and grievances through the GRM.	SMSCIDC / Contractors	i) Security Risk Assessment; ii) security personnel training records and training plan; iii) security provider monitoring or performance review records to be included in periodic reporting to lenders iv) security incident register to be included in periodic reporting to lenders	i) - ii) Prior to First Drawdown, iii) - iv) periodic report to ADB
Pollution Prevention and Resource Efficiency (ADB ESS1 & ESS3,AIIB ESS1, IFC PS3, GIIP)					
ESAP-06	Five management plans referenced in the ESMS as containing detailed pollution prevention operational controls (Erosion and Sedimentation Control Plan, Material Use and Waste Management Plan, Excavation and Soil Waste Disposal Plan, Chemical, Oil, Fuel Storage and Refuelling Plan, and Water Resources and Water Quality Management Plan) were not provided as standalone, numbered documents. Review of CHEC's EMP and HSES Manual confirms the underlying technical content exists but is embedded across broader documents (EMP S6.2 Water Quality, S6.5 Waste Management, S8.1 Monitoring; HSES-005 Excavations & Tunneling) rather than packaged as five discrete, controlled plans. The EMP itself mentions a Project Waste Management Plan (PWMP) and Hazardous Waste Management Plan (HWMP) as separate documents, but these were not independently confirmed as provided. As a result, SMSCIDC has no documented basis on which to verify, approve, or reject a contractor-submitted plan against a defined standard for sedimentation, effluent, air emissions/dust, vessel/equipment emissions, hazardous materials/fuel, or waste and spill prevention controls.	Agree with CHEC on the minimum content to be included in each of the five plans (objectives, scope, measurable targets/thresholds, roles and responsibilities, monitoring and reporting) consistent with ADB ESS1 and ESS3 requirements. CHEC to issue each plan (including the referenced PWMP and HWMP) as a standalone, numbered, and dated document reflecting the agreed content, and submit these to SMSCIDC for formal review and approval. Establish a plan register recording plan number, revision, approval date, and status for all five plans, with SMSCIDC approval as a precondition for continued related works.	SMSCIDC / CHEC	Signed and SMSCIDC-approved versions of each plan (or confirmation of consolidation where justified); updated plan register showing plan number, revision, approval date, and status	Prior to First Drawdown

ESAP Ref.	Gap / Finding	Corrective Action	Responsibility	Evidence of Completion	Timing
ESAP-07	Fill material suitability was based on geotechnical assessment only. Fill material contamination assessment covered TCLP analysis of 5 sand sources (Bucao River, PRA 2000, Maloma, Amnay River, Abra River with 1 sample per borrow area) and none of the 5 rock sources. Sample coordinates, depth and methodology were not documented. Other relevant contaminants such as total metals, organics, TPH and PCBs were not analyzed and are also not covered by the current marine water quality monitoring program.	For future sand and fill sources, apply a documented, GIIP-consistent sampling and testing protocol before the source is approved. Conduct an additional marine water quality sampling to check for the presence of the following parameters: Co, TPH, PAHs, OCPs, and PCBs. Develop a new monitoring protocol based on the sampling results, and update the marine water quality monitoring programme (ESMoMP) accordingly. Implement adaptive management measures where warranted by the monitoring results. Existing stations will be retained, where suitable. Additional stations, as needed, will be added around the islands and in the inter-island channels, with final locations set in the baseline design.	SMSCIDC	i) Approved sand source testing protocol, incorporated into the ESMS and contractor requirements; ii) Updated marine water quality monitoring plan iii) adaptive management measures, if required	i) Prior to the first drawdown, if procurement of any additional materials are required to complete the remaining works. ii) Prior to first drawdown iii) As per agreement with Lenders
ESAP-08	This finding on waste management recordkeeping (waste manifests, in/out inventory, monthly tracking logs, inspection/audit records, transfer notes, training records, and performance reports) is related to, but distinct from, the finding on the five contractor management plans (ESAP-07), which identifies that the Material Use and Waste Management Plan referenced in the ESMS has not been provided as a standalone, approved document with defined content, targets, and hold points. Waste segregation, hazardous waste storage/labelling, and third-party TSD engagement were verified during site inspection and interviews as operating in practice, with TSD facilities issuing certificates of final disposal/treatment, indicating the underlying system is functioning even though the governing plan has not been formalized. Once the Material Use and Waste Management Plan is issued and approved under ESAP-07, it should explicitly incorporate the recordkeeping and monitoring requirements identified in this finding, rather than treating them as a separate, parallel obligation. Closure of this item should be coordinated with, and where possible verified against, the approved plan under ESAP-07.	Maintain waste manifests, an inventory of products coming in and out of the project, monthly waste tracking logs, inspection and audit records, waste transfer notes, training records, and waste management performance reports. Once the Material Use and Waste Management Plan is issued and approved under ESAP-07, it should explicitly incorporate these recordkeeping and monitoring requirements as its monitoring and reporting section, rather than treating them as a separate, parallel obligation.	SMSCIDC / Contractors	Waste manifests; waste in/out inventory; monthly waste tracking logs; inspection and audit records; waste transfer notes; training records; waste management performance reports	Closure of this item should be coordinated with, and where possible verified against, the approved plan under ESAP-07.
ESAP-09	Given the scale of the 360-hectare Pasay Reclamation Project, its location along Manila Bay, and its proximity to highly urbanized areas including the MOA-PICC complex, the Macapagal Boulevard corridor, commercial developments, and nearby communities, there remains potential for construction-related dust impacts during the remaining project works. While major offshore reclamation activities have largely been completed, ongoing construction activities continue to have the potential to generate dust and affect nearby receptors if not properly managed. The main potential dust sources during the remaining construction period include surcharge removal activities and hauling of dry sand, land vibrocompaction and surface compaction works, heavy vehicle and equipment movements along haul roads and temporary access routes, rehandling of reclaimed sand, exposed sandy surfaces and stockpiles during dry and windy conditions, and the handling of aggregates and quarry rock for revetment and wave wall construction. These activities may generate localized dust emissions, particularly during periods of intensive earthworks and strong winds. The EPRMP identifies mitigation measures and provides for quarterly monitoring of Total Suspended Particulates (TSP) and PM₁₀ to manage potential air quality impacts. However, no standalone Air Quality Management Plan or Dust Management Plan was prepared. In addition, given the scale of the project, the proximity of sensitive receptors, and the nature of the remaining works, it is recommended that the existing monitoring program be supplemented with routine site inspections focused on visible dust emissions, dust movement beyond project boundaries, prevailing wind conditions, and potential impacts on nearby receptors. This would provide additional assurance that construction-related dust is effectively managed throughout the remaining construction period in accordance with a risk-based approach to environmental management.	The Project Proponent shall develop and implement a site-specific Air Quality and Dust Management Plan for the remaining construction period. The plan should consolidate existing mitigation measures, clearly define responsibilities, identify dust-generating activities and nearby sensitive receptors, establish requirements for dust suppression and housekeeping, and include procedures for routine site inspections, complaint management, and corrective actions. In addition to the existing quarterly TSP and PM ₁₀ monitoring program, the project should undertake regular visual inspections to monitor visible dust emissions, dust movement beyond project boundaries, prevailing wind conditions, and potential impacts on nearby receptors. Monitoring results, inspection records, complaints received, and corrective actions implemented should be documented and reported as part of the project's environmental monitoring and reporting requirements.	SMSCIDC / Contractors	Air Quality and Dust Management and Monitoring Plan	Prior to first drawdown
PAPs, Livelihood Restoration and Economic Displacement (ADB ESS5, AIIB ESS2, IFC PS5)					
ESAP-11	As a condition of the 22 July 2026 ECC amendment, the proponent to coordinate with MBCO on updating the Coastal Ecosystem Management Plan/Program consistent with the a) Manila Bay Coastal Strategy Operational Plan, b) the Supreme Court Mandamus on Manila Bay, and c) Pasay City rules and regulations; and to submit the coordination or updating report to EMB Central Office within 30 days after the coordination or updating.	i. Coordinate with MBCO and document the outcome, including whether an update is needed. ii. If an update is needed, prepare it consistent with items (a) to (c). iii. Submit the coordination report or documentation to EMB Central Office.	SMSCIDC	i) MBCO coordination records, ii) the updated plan (if required), and iii) proof of submission to EMB Central Office.	i and ii) Prior to first drawdown, iii) Post-drawdown milestone, to be agreed with lenders
Biodiversity Conservation and Sustainable Management of Living Natural Resources					
ESAP-12	Biodiversity values incorporated via risk identification, assessment requirements, management commitments, monitoring programmes; the BMP identifies risks/measures for terrestrial, coastal and marine receptors; baseline marine ecology assessments undertaken (manta tow, spot dives, fisheries profiling, macro-invertebrate sampling); monitoring via the EMoP. Absent: performance indicators, numerical thresholds/alert levels, escalation criteria, work-stoppage triggers, defined responses to adverse results; mitigation hierarchy not systematically applied/documented.	Revise the BMP to define biodiversity performance indicators with numerical trigger/alert values, escalation/work-stoppage criteria, and corrective action pathways, demonstrating systematic mitigation hierarchy application. Establish a formal process for reviewing monitoring results, escalating findings and implementing corrective actions.	SMSCIDC	Revised BMP	Prior to First Drawdown

ESAP Ref.	Gap / Finding	Corrective Action	Responsibility	Evidence of Completion	Timing
Cultural Heritage (ADB ESS8, IFC PS8)					
ESAP-13	A Cultural Heritage Chance Find Procedure (PRO-INT-LRC-003) is in place and applies to all contractors, consultants, and workers undertaking reclamation, dredging, excavation, filling, piling, infrastructure, utility, road, marine, coastal, and borrow-area sourcing activities. The EIS notes potential for artifacts at the site. However, records demonstrating the procedure's implementation were not provided, including signed contractor acknowledgements, awareness or induction records, toolbox talk logs, inspection records, and implementation logs.	Roll out the Chance Find Procedure to all contractors, subcontractors, consultants, and workers through documented induction and toolbox talks, with signed acknowledgements. Maintain inspection and implementation logs (including any chance finds, stop-work actions, and escalation to the National Museum where applicable) to demonstrate ongoing implementation.	SMSCIDC / Contractors	Signed contractor acknowledgements; induction/awareness training records;	Prior to First Drawdown
Information Disclosure (ADB ESS10, AIIB ESS1, IFC PS1, EP4 Principle 5)					
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
-----END-----					

SM Pasay 360 Project - ESIA ESAP				
Required Action	Evidence of Completion	Timing	Responsibility	Remarks
Prepare and disclose lender-aligned ESIA for Lender-financed horizontal infrastructure	ESIA TOR acceptable to Lenders	Prior to ADB Board or AIIB Commitment, whichever is earlier	SMSCIDC	
	ESIA acceptable to Lenders	Prior to commencement of HDD civil works or prior to first disbursement, whichever is earlier	SMSCIDC	
Prepare project-specific construction Environmental and Social Management Plan (ESMP)	Construction ESMPs acceptable to Lenders	Prior to commencement of HDD civil works or prior to first disbursement, whichever is earlier	SMSCIDC	
Prepare project-specific operations Environmental and Social Management Plan (ESMP), including the coastal protection operations and maintenance	Operations ESMPs acceptable to Lenders	Covered in Corporate ESMS ESAP	SMSCIDC	
Incorporate clauses in the EPC requiring contractors to allocate adequate resources to ensure implementation of the E&S provisions. The EPC contractor shall appoint and maintain qualified HSSE resources to manage Project's impacts and risks in line with the commitments in the project's safeguards documents.	•EPC's, HSSE org chart •Job Descriptions •CVs •Signed contracts	Prior to site mobilisation ¹ or CP to the first disbursement, whichever comes first	SMSCIDC/Contractor	¹ Site mobilization includes all preparatory activities necessary to initiate construction at the project site. These activities involve installation of temporary facilities, transport of materials and equipment, workforce deployment.
Obtain the necessary permits, approvals, consents, licenses and agreements prior to commencing the activities for which they are required.	Legal and permits register with updated status of construction phase permits	Prior to commencing activities for which permits, approvals, consents, licenses and agreements are required or prior to start of HDD civil works, whichever comes first.	SMSCIDC/Contractor	
Appoint competent auditor/s (consultant or corporate resource) to undertake EHS and labor (including as required site inspections, interviews with key staff, interviews with workers, reviews and observations at site and accommodation camps) on behalf of the Company. Suggested auditor and TOR to be agreed with Lenders.	TOR reviewed and auditor approved by Lenders Audit report	Peak of construction when all contractors have mobilized.	SMSCIDC	