

Araya I (49199)
Project Basic Information

Country: Dominican Republic	Region: Colombia, Andes & Caribbean	Project No.: 49199
Project Legal Name: Araya I	Company Legal Name: AFI Universal	
Project Business Sector: D-CA - Housing - For Sale [Project only]	Owning Department /Division: Regional Industry MAS LAC & EUR	
Environment Category: B		

IFC’s Disclosure Requirements

Date of initial ESRS disclosure 11/11/2025	Date of revised ESRS disclosure
Date of clearance by client for factual accuracy 11/6/2025	Board Approval Date

Project Description

Administradora de Fondos de Inversiones Universal, S.A. (<https://www.afiuniversal.com.do/>) (“AFI Universal”) is a fund manager based in the Dominican Republic (DR) with a total of 11 funds since inception, including real estate funds dedicated to housing developments in the DR for the low-income, touristic and urban segments. Grupo BAK, S.R.L. (<https://grupobrick.com/>) (“Grupo BAK” or the “Company”), is local developer. IFC’s proposed financing entails an up to US\$20m senior secured loan to finance the development of the Araya Phase 1 housing project (“Araya” or the “Project”), located in Bavaro, in partnership with AFI Universal and Grupo BAK, (the “Sponsors”). The Sponsors will create a trust to manage the Project, with responsibility for architectural design, construction, and property management assigned to Grupo BAK, (including E&S management). The Project will consist of 462 apartments across 77 three-story buildings, plus 1,000 square meters of ground floor retail facilities. Onsite sports and recreation facilities will be included for use by residents. Grupo BAK is responsible for architectural design and construction, as well as property management until the development is fully completed, (which will coincide with the full repayment of the IFC loan). The Company purchased the land in December 2022, (6.5 hectares), and works so far have been limited to geotechnical, topographical, and environmental studies.

Overview of IFC’s Scope of Review

In September 2024, IFC conducted an in-person visit to AFI Universal and Grupo BAK’s offices in Santo Domingo, DR, as well as a visit to the Project site. Meetings were held with project personnel on-site, as well as a virtual meeting with Grupo BAK’s Human Resources (HR) department. A second in-person visit was conducted in February 2025 focused on biodiversity. IFC’s review included an assessment of environmental, social, health and safety (E&S) related information, such as the Project E&S Impact Assessment (ESIA), the planned organizational structure, E&S related procedures, and the HR manual.

Identified Applicable Performance Standards

While all Performance Standards are applicable to this investment, IFC’s environmental and social due diligence indicates that the investment will have impacts which must be managed in a manner consistent with the following Performance Standards.

PS1-Assessment and Management of Environmental and Social Risks and Impacts
PS2- Labor and working conditions
PS3-Resource Efficiency and Pollution Prevention

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PS4-Community Health, Safety and Security

PS6-Biodiversity Conservation and Sustainable Management of Living Natural Resources

Environmental & Social Categorization and Rationale

This is a Category B project according to IFC's Policy on Environment and Social Sustainability (2012). Based on information reviewed by IFC, the proposed project will have limited adverse E&S impacts that are few, site specific, largely reversible and readily addressed through existing mitigation measures and good international industry practices (GIIP). Key E&S issues and risks associated with the project include: (i) management and monitoring systems to assess and manage E&S risks and impacts; (ii) consistent management of labor and working conditions and occupational health and safety (OHS); (iii) contractor E&S management; (iv) life and fire safety (L&FS) risk management; (v) monitoring and management of wastewater; (vi) conversion of natural habitat, and (viii) stakeholder management.

Environmental & Social Mitigation Measures

(Observations that are not to be disclosed must be recorded in ESG360)

IFC's appraisal considered the environmental and social management planning process and documentation for the Project and gaps, if any, between these and IFC's requirements. Where necessary, corrective measures, intended to close these gaps within a reasonable period of time, are summarized in the paragraphs that follow and (if applicable) in an agreed Environmental and Social Action Plan (ESAP). Through the implementation of these measures, the Project is expected to be designed and operated in accordance with Performance Standards and objectives.

Applicable PSs summary

PS1: Assessment and Management of Environmental and Social Risks and Impacts

The trust will assign responsibility for E&S management to Grupo BAK. For the construction phase, an Integrated Management System (IMS) will be established in accordance with Grupo BAK's Construction Manual. For the operations phase, E&S management plans will be developed and implemented. To systematically manage E&S in full alignment with the requirements of the IFC PS, as per ESAP #1, Grupo BAK will build on its existing processes to develop an E&S Management System (ESMS) for the Project, commensurate to the scale and impacts of its activities and consistent with national law, the requirements of the IFC PS, and the World Bank Group (WBG) General Environmental, Health and Safety (EHS) General Guidelines (2007), ("WBG Guidelines").

Prior to purchasing the land, Grupo BAK confirmed that the plot was unoccupied, and then an E&S Impact Assessment (ESIA) was prepared by a specialized consulting firm, (approved by the relevant authorities, and disclosed together with this ESRS). The assessment considers the anticipated effects of climate change and includes the identification of emergency scenarios, requiring the development of an emergency preparedness and response plan (EPRP) for construction and operations.

The ESIA includes a suite of E&S management plans to be developed for construction and operations, which mostly align with IFC PS, and identified gaps are addressed by ESAPs # 3 to 7 and 10 to 12, for example, as part of ESAP #1, Grupo BAK will develop a Chance Finds Procedure in line with local requirements and IFC PS8.

The trust will oversee the Project via a technical committee, supported by an independent engineer. Grupo BAK has assigned a Project Director to manage construction, who will oversee an on-site IMS Manager, who in turn will manage an on-site OHS Coordinator and Environmental Coordinator. Once the first phase of construction is complete, Grupo BAK will establish and chair a homeowners' association, responsible for managing operations. Grupo BAK will continue to lead the homeowners' association until the Project is fully complete, (which will coincide with the full repayment of the IFC loan). At that point, leadership of the homeowners' association will be handed over to a chairperson elected by the residents, and Grupo BAK will cease to be involved in operations.

As per ESAP #2, Grupo BAK will designate a qualified IMS Manager (with knowledge of the national regulatory requirements and applicable requirements of IFC PS), responsible for the development, implementation and maintenance of the ESMS and related E&S programs, plans and procedures. The IMS

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Manager will also oversee the handover of E&S duties to the residents once a chairperson is elected.

Grupo BAK's EHS team will be responsible for conducting weekly EHS inspections and daily checklists. As part of ESAP #1, the Project will develop procedures to monitor and measure effectiveness of its ESMS and compliance with legal/contractual obligations, IFC PS, and relevant metrics of the WBG Guidelines, including key performance indicators (KPIs) and performance targets.

PS2: Labor and Working Conditions

Human Resources Policies and Procedures

The project will have a peak of ~250 workers during the construction stage, consisting of both direct employees and third-party contractors, with ~45 employees during operations. Grupo BAK's HR practices are in alignment with the DR labor code, that generally aligns with PS2. The local legislation covers a wide range of labor-related issues including recruitment, employment contracts, working hours, rest periods, termination, severance and collective bargaining. The Labor Code also requires that at least 80% of an entity's workforce must be Dominican, and no less than 80% of the payroll must correspond to wages earned by Dominicans, except for technical or executive positions. The Labor Code recognizes the validity of both written and verbal contracts and prohibits forced and child labor.

Grupo BAK's Administration and Finance Manager has overall responsibility for HR matters for employees, who's written contracts consider responsibilities and working hours. At the project level, there will be an HR Coordinator reporting to the Project Director, who will conduct periodic labor compliance audits. The Company has an HR Handbook ensuring labor rights and working conditions, in line with DR legislation. The Company does not have collective bargaining agreements. As per ESAP #3, the Project will develop and implement the necessary project-specific HR related procedures appropriate to its size and workforce, including a Labor Policy, which will address working conditions and requirements for staff and contractors, ensuring compliance with IFC PS2 and applicable labor law. The policy and procedures will be communicated to all staff and contractors during site induction, as well as annual refresher training.

The Project operates a workers grievance mechanism by means of in-person reporting to the direct manager, Project Director, or HR representative. To systematically manage workers grievances, as per ESAP #4, the Project will develop a documented Workers Grievance Management Procedure (GMP) in line with IFC PS2, including (i) channels to submit grievances (including anonymously), and (ii) the steps to manage grievances, monitor and report statistics, and raise awareness of the mechanism. The Workers GMP will apply to staff as well as contractors.

To systematically manage Gender-Based Violence and Harassment (GBVH) risks, as part of ESAP #4, the Project will develop a GBVH and Workplace Harassment Policy incorporating a specific referral pathway for GBVH cases. Grupo BAK will implement a GBVH training program and will systematically disclose the Workers GMP to direct and contractor workers and promote access to it.

Occupational Health and Safety

Grupo BAK manages OHS in line with national law and standards. During the construction phase, work will be conducted in accordance with a construction management plan, which will contain the project's OHS requirements. To systematically manage OHS during construction and operations, as part of ESAP #1, the ESMS will include an OHS policy and OSH practices consistent with the requirements of IFC PS and the WBG Guidelines.

Workers Engaged by Third Parties

Much of the construction workforce for the Project will be contracted (a mixture of individuals and companies). Procurement is outsourced to specialist local firm, who's pre-qualification process includes checking records of accidents. The construction management plan will include a section addressing the management of contractors, who will be required to follow the E&S protocols of Grupo BAK. A project management committee will meet once a week to review E&S performance.

To systematically manage construction contractors, as per ESAP #5, the Project will develop a Contractor E&S Management Procedure in alignment with the IFC PS, WBG Guidelines, and IFC's Good Practice Note on Managing Contractor's E&S Performance (2017). This procedure will include E&S screening for contractor

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selection, establishing minimum E&S management measures and reporting requirements (including KPIs), and defining roles and responsibilities at Grupo BAK to oversee E&S performance. The minimum E&S controls will cover labor and working conditions, including adherence to labor law, the IFC PS, and Grupo BAK's Labor Policy. These E&S requirements will be included in contractors' contracts, and training sessions will be conducted to ensure compliance.

For construction, an accommodation camp will be built for contract workers. As part of ESAP #6, Grupo BAK will develop a Worker's Accommodation Plan to ensure alignment with PS2 and IFC/EBRD Guidance Note for Worker Accommodation Processes and Standards (2009) regarding safety and health, appropriate construction standards, provision of adequate and sanitary living conditions, and adequate sex-segregation. The plan will include a GBVH Risk Assessment and Preventive Action Plan to address risks within the accommodation.

PS3: Resource Efficiency and Pollution Prevention

The Project's design includes measures for natural ventilation, reduced solar heating, and rooftop photovoltaics. During construction, air emissions will mainly come from dust, diesel generators, and vehicle engines, while in operations, emissions will be limited to emergency generators and domestic use of liquefied petroleum gas (LPG). Since national noise regulations are less stringent than guideline levels in the WBG Guidelines, the Project will, as part of ESAP #1, update their noise management plan to align with said guidelines.

During construction, potable water will be supplied by third-party tankers but in operations on-site groundwater wells will provide potable water (consumption is expected to be ~4 l/s). Due to poor groundwater quality, the Project will, as per ESAP #7, procure, install, and operate a potable water treatment plant (PWTP) in line with GIIP to comply with World Health Organization (WHO) drinking water standards. A monitoring plan will verify that all water supplied to areas of food preparation or for the purpose of personal hygiene complies with the WHO standards.

During construction, sanitary wastewater will be managed using a septic system while during operations, it will be routed to a wastewater treatment plant (WWTP). In both scenarios, solids will be collected and disposed of as hazardous waste by an authorized third party. In operations, some treated effluent will be used for irrigation (~40 m³/day), but the majority (~250 m³/day) will be directed to infiltration wells. The infiltration well discharges are subject to a specific permit which will stipulate maximum permissible limits for certain water quality parameters.

To supplement the existing ESIA, the Project will, as part of ESAP #7, hire a qualified consultancy, including a hydrologist and wastewater engineer, to conduct a hydrogeological study to assess project impacts on water supply and groundwater quality. In terms of facilities, Grupo BAK will procure, install, and operate a wastewater treatment plant (WWTP) in line with GIIP. The plant will comply with the wastewater quality standards of Table 1.3.1 of the WBG Guidelines, and a monitoring plan will verify compliance. To minimize the quantity of wastewater produced and disposed of onsite, the Project will, as per ESAP #8, include water-saving features in line with GIIP, and ensure that the design of the wastewater system can easily tie-in to the public sewage network once one becomes available.

Construction contractors will manage waste per a Waste Management Plan (WMP). During operations, a new WMP tailored to residential waste will be implemented. Authorized third parties will handle waste collection and disposal. Storage of hazardous substances will be consistent with legal requirements and the ESIA, which align with IFC PS, and the WBG Guidelines. As part of ESAP #1, procedures for the management of waste and pesticides/herbicides will comply with the requirements of IFC PS and the WBG Guidelines.

PS4: Community Health, Safety and Security

During the construction phase, work will be conducted in accordance with a construction management plan, which will contain community health and safety requirements. To fully align with the IFC PS, and the WBG Guidelines, as part of ESAP #5, the Contractor E&S Management Procedure will include community health and safety management practices, including a transportation safety plan. As part of the Worker's Accommodation Plan per ESAP #6, Grupo BAK will develop a GBVH Risk Assessment and Preventive Action Plan to address risks associated with the influx of workers during construction. Preventive actions will include, at a minimum, awareness campaigns and communication of the grievance referral pathway within the local

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community, including residents of the apartments once occupied.

During construction, armed security will be contracted to control access to deter theft of materials. During operations, unarmed security will control access. As part of ESAP #1, Grupo BAK will develop and implement a security procedure in line with IFC PS4 addressing the construction and operations phases, including adequate training consistent with principles of human rights, training in the proportional use of force, as well as availability of the external grievance mechanism for affected communities to report any misconduct or harassment.

This mixed-use complex comprises three-story residential buildings with retail space accessible to the public on the ground level. Due to the buildings' limited height, the local fire safety requirements are minimal, as specified in the construction permit. Fire extinguishers are installed on each floor, and fire hose reels and pressurized standpipes, supported by dedicated fire pumps and water supply, will be installed throughout the estate. The ESIA includes specific provisions for leak prevention and a fire response plan for the LPG tank and surrounding areas. Additionally, the buildings have been designed in accordance with the DR's hurricane building code, which is considered good practice in the Caribbean region.

As per ESAP #9, the Project will install an addressable fire detection and alarm system to cover the common areas of each building and supervision of the systems in the retail spaces. This will enable the security guard to identify the alarm on the panel and respond to the exact location of the fire incident. Additionally, as the initial chair of the homeowners' association, Grupo BAK will establish a user manual for each building in the complex. This manual will detail the specific L&FS arrangements, including the required inspection and maintenance program, emergency exit locations, evacuation plans, drills, training, and information to be provided to residents and tenants. The overall EPRP for the Project will include coordination and communication measures with the neighboring power plant, Consorcio Energético Punta Cana, in the event of any emergency, such as fire, explosion, or gas release.

PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

The project is within the Hispaniolan moist forests WWF Ecoregion and does not overlap with key biodiversity or legally protected areas. The 6.4-hectare site, likely deforested before 2005 for agriculture and livestock, is now surrounded by urban development. The ESIA found the area covered by secondary vegetation (4-6 m tall) with scattered trees (~15 m). Priority biodiversity species include the Cana palm (*Sabal causiarum* - EN per national list) and the Boca de Yuma frog (*Eleutherodactylus probolaeus* - range restricted and EN per IUCN and national list), among others, indicating the site is natural habitat. Supplementary studies confirmed *E. probolaeus* presence, and predictive models suggest a distribution larger than documented.

The project's main impacts on biodiversity include natural habitat loss and impacts on priority biodiversity values due to vegetation clearance. The ESIA's management plans include rescue and relocation of several plant species: *S. causiarum*, Guáyiga (*Zamia debilis*); Vera (*Guaiacum sanctum*); and Quiebra-hacha (*Krugiodendrum ferreum*), (later two are listed as VU per national list). Additionally, the ESIA includes provisions to promote planting of native species during landscaping. As per ESAP #10, Grupo BAK will develop and implement a plant rescue and relocation protocol that, as much as feasible, adopts the IUCN recommendations on responsible translocation of displaced organisms, including the Guidelines for Reintroduction and Other Conservation Translocations. Furthermore, to support the landscaping program, the project will develop and implement a plant species selection protocol that, as much as feasible, adopts the IUCN Guidelines for the Prevention of Biodiversity Loss caused by Alien Invasive Species.

As per ESAP #11, Grupo BAK will develop and implement a Biodiversity Action Plan (BAP) in line with IFC PS6, to mitigate and offset residual impacts on natural habitat for *E. probolaeus* and other priority biodiversity values. The BAP will include: i) an assessment to determine residual impacts on natural habitats and priority biodiversity values; ii) an offset program and strategy to meet no net loss requirements; and iii) stakeholder consultation on the offset design and development. In addition, Grupo BAK will develop and implement a Biodiversity Monitoring and Evaluation Plan in line with IFC PS6, focused on priority biodiversity values, to evaluate and monitor the effectiveness of the offset program.

Stakeholder Engagement

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As part of the ESIA, Grupo BAK undertook an information and consultation process, providing communities and other external stakeholders contact details for reporting grievances. As per ESAP #12 Grupo BAK will develop a Stakeholder Engagement Plan (SEP) in line with IFC PS1. The SEP will include a GMP, defining the arrangements for disseminating and handling grievances received by local communities. The SEP will be in place for the construction phase and will be updated to include residents during the operations phase. As part of the engagement plan, prospective buyers will be informed of the ESMS.

Broad Community Support

Not Applicable

BCS Comment :

Local Access of Project Documentation

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Environmental & Social Action Plan (ESAP)

Is there an ESAP to be disclosed for this project?
 Yes

Mitigation Measures / Environmental & Social Action Plan (ESAP)

SNo	Description	Anticipated Completion Date
1	Grupo BAK will develop and implement a Biodiversity Action Plan (BAP) in line with IFC PS6, to mitigate and offset residual impacts on natural habitat for E. probolaeus and other priority biodiversity values. The BAP will include: i) an assessment to determine residual impacts on natural habitats and priority biodiversity values; ii) an offset program and strategy to meet no net loss requirements; and iii) stakeholder consultation on the offset design and development. In addition, Grupo BAK will develop and implement a Biodiversity Monitoring and Evaluation Plan (BMEP) in line with IFC PS6, focused on priority biodiversity values, to evaluate and monitor the effectiveness of the offset program.	6/30/2026
2	Grupo BAK will develop a Contractor E&S Management Procedure in alignment with the IFC PS, the WBG General EHS Guidelines (2007) and IFC’s Good Practice Note on Managing Contractor’s E&S Performance (2017). This procedure will encompass E&S screening for the selection of contractors, the establishment of minimum E&S management measures and reporting requirements (including KPIs) to be implemented by contractors, and the definition of roles and responsibilities at Grupo BAK to oversee E&S performance. These requirements will be incorporated into the contractors' contracts, and training sessions will be conducted to ensure compliance. Community health & safety requirements will include, among others, a transportation safety plan for project vehicles, as well as adequate segregation of the public from workplace hazards.	3/31/2026

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3	<p>Grupo BAK will build on its existing processes to develop an E&S Management System (ESMS) for the Project, commensurate to the scale and impacts of its activities and consistent with national law, the requirements of IFC PS, and the World Bank Group (WBG) General Environmental, Health and Safety (EHS) Guidelines (2007). Documented procedures will include (i) a chance finds procedure; (ii) a security procedure, addressing both the construction and operations phase, including adequate training consistent with principles of human rights, training in the proportional use of force, as well as availability of the external grievance mechanism for affected communities to report any misconduct or harassment; (iii) a noise management plan, and (iv) a pesticide/herbicide management plan.</p>	8/31/2026
4	<p>To supplement the existing ESIA, Grupo BAK will hire a qualified consultancy, including a hydrologist and wastewater engineer, to conduct a hydrogeological study to assess project impacts on water supply and groundwater quality and establish a site-specific wastewater treatment target. In terms of facilities, Grupo BAK will procure, install, and operate a potable water treatment plant (PWTP) and a wastewater treatment plant (WWTP) in line with Good international Industry Practice (GIIP). The PWTP will comply with World Health Organization (WHO) drinking water standards. Discharges from the WWTP will achieve treatment levels that do not cause further degradation from background pollution levels (based on the results of the aforementioned hydrogeological study) or comply with the wastewater quality standards of Table 1.3.1 of the WBG Guidelines, whichever is most stringent. Monitoring plans for potable water and wastewater will be developed to verify compliance with the corresponding quality standards.</p>	12/31/2025
5	<p>Grupo BAK will designate an IMS Manager (with knowledge of the national regulatory requirements and applicable requirements of IFC PS), responsible for the development, implementation and maintenance of the ESMS and related E&S programs, plans and procedures.</p>	1/31/2026
6	<p>Grupo BAK will develop and implement the necessary project-specific HR related procedures appropriate to its size and workforce, including a Labor Policy. The policy and procedures will address working conditions and requirements for staff and contractors, ensuring compliance with IFC PS2, and applicable labor law. These procedures will be communicated to all staff and contractors during site induction, as well as annual refresher training.</p>	6/30/2026
7	<p>Grupo BAK will install an addressable fire detection and alarm system to cover the common areas of each building and supervision of the systems in the retail spaces. This will enable the security guard to identify the alarm on the panel and respond to the exact location of the fire incident. Additionally, as the initial chair of the homeowners' association, Grupo BAK will establish a user manual for each building in the complex. This manual will detail the specific L&FS arrangements, including the required inspection and maintenance program, emergency exit locations, evacuation plans, drills, training, and information to be provided to residents and tenants. The overall EPRP for the Project will include coordination and communication measures with the neighboring power plant, Consorcio Energético Punta Cana, in the event of any emergency, such as fire, explosion, or gas release.</p>	8/31/2027
8	<p>Grupo BAK will develop and implement a plant rescue and relocation protocol that, as much as feasible, adopts the IUCN recommendations on responsible translocation of displaced organisms, including the Guidelines for Reintroduction and Other Conservation Translocations. Furthermore, to support the landscaping program, the project will develop and implement a plant species selection protocol that, as much as feasible, adopts the IUCN Guidelines for the Prevention of Biodiversity Loss caused by Alien Invasive Species.</p>	12/31/2025
9	<p>Grupo BAK will develop a Stakeholder Engagement Plan (SEP) in line with IFC PS1 and will assign responsibility for coordinating its implementation. The SEP will include a Stakeholders GMP, defining the arrangements for disseminating and handling grievances received by local communities, including GBVH grievances. The SEP will be in place for the construction phase and will be updated to include residents during the operations phase. As part of the engagement plan, prospective buyers will be informed of the ESMS.</p>	3/31/2026
10	<p>To minimize the quantity of wastewater produced and disposed of onsite, Grupo BAK will include water-saving features in line with GIIP and ensure that the design of the wastewater system can easily tie-in to the public sewage network once one becomes available.</p>	3/31/2026

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11	<p>Grupo BAK will develop a Worker's Accommodation Plan to ensure that contract worker housing aligns with PS2 and IFC/EBRD Guidance Note for Worker Accommodation Processes and Standards (2009) with regards to safety and health, appropriate construction standards, provision of adequate and sanitary living conditions, and adequate sex-segregation. The plan will include a GBVH Risk Assessment and Preventive Action Plan to address risks within the accommodation as well as risks associated with the influx of workers to the local area.</p>	3/31/2026
12	<p>Grupo BAK will develop a documented Workers Grievance Management Procedure (GMP) in line with IFC PS2, including (i) channels to submit grievances (including anonymously), and (ii) the steps to manage grievances, monitor and report statistics, and raise awareness of the mechanism. The Workers GMP will apply to staff as well as contractors. Grupo BAK will also develop a Gender-Based Violence and Harassment (GBVH) and Workplace Harassment Policy incorporating a specific referral pathway for GBVH cases. Grupo BAK will implement a GBVH training program and will systematically disclose the Workers GMP to direct and contractor workers and promote access to it.</p>	6/30/2026

Activity Log/Comments

Workflow Initiated by Paulina Alejandra Castaneda Hernandez (Draft Environmental and Social Review Summary) Nov 10, 2025 08:47 PM ET

Comments:

Cleared by Mandar Parasnis (ESRO Clear) Nov 11, 2025 03:39 PM ET

Comments:

CRU Member Approved and Appraisal Disclosure Initiated by Ejura Phoebe Audu Nov 11, 2025 04:06 PM ET

Comments:

Client clearance received on 11/06/2025.

Supporting Documents

S.No.	Document Details
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