

**HORN OF AFRICA REGIONAL
INTEGRATION FOR
SUSTAINABLE ENERGY
SUPPLY (P174175) PROJECT
(ETHIOPIA).**

**LABOUR MANAGAMENT
PROCEDURES**

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ACRONYMS

AM	Accountability Mechanism
AoI	Area of Influence
CSO	Civil Society Organizations
DRC	Democratic Republic of Congo
EAPP	East Africa Power Pool
EEP	Ethiopia Electric Power
EHS	Environmental Health and Safety
ESCP	Environmental and Social Commitment Plan
ESF	Environment and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GBV	Gender Based Violence
GIIP	Good International Industry Practice
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
HOA	Horn of Africa
HoAI	Horn of Africa Initiative
HVTL	High Voltage Transmission Line
ICP	Informed Consultation and Participation
IGAD	Intergovernmental Authority on Development
LMP	Labor Management Procedure
LMP	Labour Management Procedures
OHS	Occupational Health and Safety
OHTL	Overhead Transmission Line
OIP	Other Interested Parties
PAHs	Project Affected Households
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
RPSMP	Regional Power System Master Plan
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SMEs	Small to Medium Sized Enterprises
UN	United Nations
WBG	World Bank Group

I PROJECT OVERVIEW

1.1 Introduction

The Horn of Africa (HOA) region has faced constant conflicts and instability, impeding infrastructure and social service development. Access to affordable and reliable energy is hindered by high costs and unreliable supply, impacting small businesses, entrepreneurs, and essential services like healthcare and education. The region's abundant energy resources present opportunities for power trade. Power trade in the HOA region would offer numerous benefits, including lower operating and investment costs, enhanced sector reliance, improved access to electricity, increased viability of investments, better financial standing for utilities, lowered greenhouse gases emissions, renewable energy use, and reduced strain on state budgets. The Horn of Africa countries launched the Horn of Africa Initiative (HOAI) in 2019, recognizing the need for a concerted effort to collectively augment the development trajectory. Among the selected areas of priority is investments in development of regional infrastructure networks covering upgrading of economic corridors, energy, and digital connectivity.

The World Bank working closely with the government of Ethiopia and other governments in the region, proposes to provide support in adopting a regional approach to build physical connectivity and expand access complementing the multitude of national initiatives through Horn of Africa Regional Integration for Sustainable Energy Supply (P174175) Project. The project is aligned with the World Bank's Country Partnership Frameworks and supports the World Bank Group (WBG) Africa Regional Integration and Cooperation Strategy and aligned with the objectives of the HOAI, the Eastern African Power Pool (EAPP) Strategic Plan, and the Inter-Governmental Authority on Development (IGAD) Regional Infrastructure Master Plan.

1.2 Project Development Objective

The Horn of Africa Regional Integration for Sustainable Energy Supply (P174175) is a World Bank financed project whose objective is to enhance regional integration of energy supply and to improve energy access in the borderlands in Horn of Africa countries.

1.3 Project Components

1.3.1 Component 1-Physical Interconnection Infrastructure

The component will provide support to some or all of the following activities, depending on investment readiness and political buy-in from the client countries: (a) the construction of 500 kV transmission lines between Ethiopia and Somaliland (Northern and Southern), (b) the reinforcement of the existing Ethiopia-Sudan 230 kV double circuit transmission line, and (c) the construction of the second Ethiopia-Sudan 500 kV transmission line.

1.3.2 Component 2-Energy Access Interventions in Borderland Areas

Component 2 targets energy access interventions in borderland areas, mostly agri-pastoralist population in Ethiopia and Somalia. It includes the following activities: (a) electricity access to public institutions (for example, health facilities, schools, veterinary posts, community centers, street lighting, telecom towers), (b) electricity access to households, (c) electricity access for productive uses (for example, water points-which are

mostly privately owned-refrigeration and cold chains, agri-processing, and so on), and (d) access to clean cooking for households and social centers in borderland communities of the HoA. Women are expected to benefit disproportionately from the interventions as they have lesser mobility whereas men tend to travel seasonally for livestock trading and are already engaged in cross-border trading activities. This component will also support a benefit-sharing program for the affected communities by Component 1. This component will prioritize the most vulnerable and underserved communities or development nodes¹ where there is lack of energy access, concentrated presence of public institutions and water points along trading routes (places of gathering for surrounding communities, including nomadic population) and markets, and existing cross-border trade.

1.3.3 Component 3-Technical Assistance and Capacity Building for Regional Power Integration

Component 3 will provide technical assistance and capacity building to the EAPP and its member countries. This component will be informed by the Regional Power System Master Plan (2014) (RPSMP) of the EAPP² and the African Union Program Infrastructure Development for Africa (PIDA) 2020 Priority Action Plan. In addition, proposed activities will be informed by the EAPP 10-year Strategic Plan (2018–2027) and the Short-term Action Plan (2021–2023).

1.4 Component 1 Project Description

The component 1 of the project will essentially involve the construction of the Northern Interconnector³ Ethiopia and Somaliland section which include 330km Debre Zeit-Hurso; 140km Jigjiga-Hargeisa; 80km Hargeisa-Berbera and sub stations. The line begins at Ethiopia's in Oromia Region in Bishoftu and terminating in Hurso still in Oromia Region before connecting to a substation in Jigjiga in Somali Region up to Tog Wajaale at the border between Ethiopia and Somaliland. From this point, the line traverses Hargeisa from Wajaale in Somaliland and terminating in Berbera, a port city in Somaliland.

The Southern Interconnection⁴ consists of about 780km of transmission line subdivided into two segments (Negele-Dolo Ado and Dolo Ado-Mogadishu), with the involvement of 3 sub-stations (Negele-Dolo Ado, Mogadishu).

1.5 Component 2 Project Description

As described in 1.3.2 above, the details of component 2 are largely unknown but will entail construction of energy access interventions in borderland areas, mostly agri-pastoralist population in Ethiopia and Somalia.

¹ A development node is defined as a location of strategic importance to maximize the development impact in the area. A development node can be identified by various factors, including, but not limited to, the concentrated presence of services such as water points, education and health facilities; markets (livestock or agricultural markets); communication nodes (telecommunication towers); proximity to trading routes or places of gathering for surrounding communities, nomadic population, and displaced people.

² The RPSMP is subject to update, which is expected to start in June 2021.

³ A separate LMP has been developed for the Ethiopia and Somalia section of the Northern and Southern Interconnector.

⁴ A separate LMP has been developed for the Somalia section of the Southern Interconnector.

1.6 LMP Justification

This Labor Management Procedure (LMP) has been developed to identify and manage risks associated with labor and working conditions and occupational health and safety during the undertaking of project activities. It is designed to ensure that labour and working conditions during project implementation is consistent with the requirement of the World Bank's Environmental and Social Framework (ESF), and the applicable laws. The World Bank requirements on labour and working conditions are outlined in Environment and Social Standard ESS2, community health and safety, and Occupational Health and Safety (OHS) concerns are adequately addressed under ESS4. of the ESF.⁵ The LMP makes provisions for the project that will be applied with due consideration of the requirements of national laws. The World Bank recognizes that borrowers can promote sound workers management relationships and enhance the development benefits of a project by treating workers in the project fairly, while providing safe and healthy working conditions.

1.7 LMP Objectives

The objective of preparing an LMP is to identify and manage risks associated with labor and working conditions under the Project. The LMP identifies labor requirements in line with applicable laws, standards and sets out the procedures for addressing labor conditions and risks associated with the project in line with the World Bank Environmental and Social Standard 2 (ESS 2). The main objectives of developing the LMP are to:

- Promote safety and health at work
- Promote fair treatment, non-discrimination, and equal opportunity of project workers
- Protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with ESS 2) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate
- Prevent the use of all forms of forced labour and child labour
- Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national laws; and
- Provide project workers with accessible means to raise workplace concerns.
- Identify the different types of project workers that are likely to be involved in the project
- Identify, analyse and evaluate the labour-related risks and impacts of the project activities; and
- Set out procedures to meet the requirements of ESS2, ESS4 (as applicable) and relevant national legislation.

This LMP covers all workers involved in the project; it outlines potential labour risks, working conditions, occupational health and safety (OHS), and worker grievance mechanism. It ensures that all workers in the project are provided with a safe and fair working environment in line with the Ethiopia legal frameworks and promotes a diverse

⁵ See <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/esf-training>.

and inclusive work environment that respects the rights and dignity of all workers. The document sets out policies and procedures governing the following:

1. Legal Compliance—ensuring all labour practices adhere to the aforementioned governing Labour Proclamation No.1156/2019 and the World Bank’s Environmental and Social Standards. This also includes aligning practices to comply with domestic and international law and standards.
2. Risk Identification and Assessment-recognizing potential risks concerning labor conditions within the project activities and developing strategies to mitigate them. This involves conducting thorough risk assessments and implementing controls.
3. Labour Requirements-clearly defining the labour requirements for the project, including skill levels, age of employment, working hours, safety protocols, and other necessary provisions.
4. Grievance Redress Mechanism-outlining clear procedures to respond to any issues or grievances relating to labour conditions promptly. This may involve mechanisms for reporting, investigating, and rectifying labour related challenges.
5. Contractor Management
6. Primary Supply Workers
7. Roles and responsibilities for implementing the LMP has also been documented in line with the project structure.

1.8 LMP Scope

This LMP also provides an overview and characterization of labour use on the project. The LMP has assessed the potential labour risks associated with the project based on type of work and workers and documented appropriate mitigation measures. Roles and responsibilities for implementing the LMP has also been documented in line with the project structure for implementing the Project. The LMP recognizes the need for establishing a grievance redress mechanism (GRM) for workers and a procedure has been provided to guide development of site-specific labour management plans by contractors.

The compliance obligations have also been documented which will serve as supplemental policies that will guide the implementation of this LMP including national laws, international laws, and in particular, the World Bank ESS2. The LMP sets out policies and procedures governing the following:

- Application of the national labour legal frameworks and ESS 2 on the Project
- Overview of labor use on the Project
- Responsible staff
- Policies and procedures
- Age of employment
- Terms and conditions
- Grievance mechanism
- Contract management
- Primary supply workers
- Assessment of Key Potential Labor Risks
- Brief overview of labor legislation: terms and conditions

- Brief overview of labor legislation: occupational health and safety (OHS)
- Overview of OHS procedures; and
- Code of Conduct (CoC) for all staff and project workers.

I.9 LMP Implementation

The LMP will be implemented by Ethiopia PIU at the EEP to ensure that labour and working conditions are compliant with domestic legal requirements and ESS2. Regular monitoring and evaluation will be conducted to assess the effectiveness of the procedures and address any emerging labour-related issues promptly. Moreover, continuous training and capacity building programs will be provided to project staff and workers to enhance awareness of labour rights, occupational health and safety standards, and the grievance redress mechanisms.

2 OVERVIEW OF LABOR USE ON THE PROJECT

2.1 Number of Project Workers

The exact number of workers to be engaged in the project for the installation and commissioning of the overhead transmission line (OHL) and other project activities is still unknown. This is because the feasibility studies, detailed design and bidding documents for the design supply, installation, and commissioning of the (OHL) are still in the process of preparation. Nevertheless, the project has reviewed past similar completed projects in the region to arrive at an estimate of the number of workers that would be required for the construction phase. The reviews show that approximately 150-200 will be utilized in the construction phase. No matter the final numbers, the project will aim to not have more than 150 persons at a time at the construction sites.

2.2 Characteristics of Project Workers

It is anticipated that the project will need a mix of local labourers from surrounding villages and labourers from other regions of Ethiopia. The contractor and subcontractors will most likely hire national⁶ migrant workers from various regions of Ethiopia-these so-called “internal migrants” would be laborers who have had prior experience working on high voltage transmission lines in the region. The majority of foreign migrant⁷ workers will most likely be technical and managerial personnel, together with a small number of domestic workers (cleaning, cooking, etc.). Contractor decisions would determine the amount of migrant labour. It is not anticipated that there would be a large proportion of male workers than female due to the nature of the project workforce, which consists primarily of unskilled and semiskilled construction labour, and the distinctive characteristics of Ethiopia’s labour market. It is predicted that women would comprise about 5-10 percent of the workforce, and those would likely be technical (engineering) and/or workers working in the operating offices and camps (maids, cooks, cleaners etc.). All workers will be 18 years of age and above.

2.3 Project Workers’ Categorization

ESS 2 categorizes project workers into: direct workers; contracted workers; community workers; and primary supply workers. The labor category of direct workers will be government civil servants (mainly those that belong to the EEP and the federal, regional and district levels and staff from other relevant government ministries, departments and agencies deployed to provide requisite technical support to the Project. Both the civil servants and consultants shall be governed by the Labour Proclamation No.1156/2019. Consultants will be governed by a set of mutually agreed contracts. The consultants will be part of the established EEP-PIU.

⁶ Migrant workers’ who have migrated from one part of the country to another for purposes of employment whether full time, part time, temporary or seasonal.

⁷ Migrant workers’ who have migrated from one country to another to another for purposes of employment whether full time, part time, temporary or seasonal.

The following categories of project workers are expected to be engaged by Project:

- **Direct Workers**⁸: Direct workers at Project Implementation Units (at EAPP and EEP) include project managers, engineers, safeguards team (environmental, social, gender and OHS), land economists, resettlement specialists, procurement specialists, finance specialists, legal experts totalling no more than 30 employees. Independent consultants specializing in areas like community relations and social safeguards may also serve as direct workers on a part-time basis with defined roles and responsibilities.
- **Contracted Workers**⁹: Contracted labour refers to workers hired by contractors for various tasks such as consulting, design, supply, installation, and commissioning. Contractors may need to collaborate with subcontractors who will also provide workers for the project. It is estimated that around 150 to 200 contracted workers will be employed in total.
- **Community Workers**¹⁰: It is not anticipated that there will be any employment related to this project for community workers.
- **Primary Suppliers**¹¹: Businesses that produce conductors and transmission towers will be the transmission line's principal providers. Firms that produce transformers, electrical switching equipment, and other large electrical equipment would be the main suppliers for the substation. The principal suppliers if fill material is required would likewise be the nearby quarries. Additionally, there are no known high hazards of forced labour or child labour in these industries. When contractors collaborate with local suppliers, they will be required to thoroughly investigate to ensure there are no significant issues related to child or forced labour and worker safety. Similarly, when engaging foreign suppliers, contractors must assess whether the supplier has a history of involvement in these illegal activities and examine their corporate policies on child labour, forced labour, and workplace safety during the procurement process.

The main construction crews expected to be involved in the project are:

1. Transmission Line Construction Crew-This crew will be responsible for the construction, installation, and commissioning of the OHL. Their tasks will include tower foundation, tower erection, conductor stringing, insulator installation, and other line construction activities.
2. Substation Construction Crew-This crew will focus on the construction, installation, and commissioning of the substations. Responsibilities will include civil works, equipment installation, and commissioning of the substation components.

⁸ People employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project (direct workers).

⁹ People employed or engaged through third parties to perform work related to core functions of the project, regardless of location. Third parties' may include contractors, subcontractors, brokers, agents or intermediaries. Core functions of a project constitute those production and/or service processes essential for a specific project activity without which the project cannot continue.

¹⁰ People employed or engaged in providing community labor.

¹¹ People employed or engaged by the Borrower's primary suppliers. Primary suppliers' are those suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project.

3. Rehabilitation Crew-This crew will be responsible for restoring disturbed construction area as soon as possible after the completion of the works of previous crews.
4. Supporting Staff-Additional personnel such as project managers, engineers, technicians, safety officers, quality control inspectors, and administrative staff.

It is anticipated that there will be construction crews for the project, with typically 2-3 crews overall, each responsible for specific tasks such as wayleave-clearing, foundation work, tower assembly, conductor stringing, and land restoration. The crews will be made up of teams with specialized skills to complete the specific jobs efficiently.

2.4 Timing of Labor Requirements

The construction phase for component 1 of the project is estimated to last approximately 24 months while the estimated construction timelines for component 2 are unknown but could take between 6-12 months. Most of the unskilled labourers will be sourced from the local communities in different regions of the country. Managerial and technical staff will also come from the Ethiopia as well as from within the region. In the early stages of the construction process, most of the workers are expected to be unskilled labourers. As the project progresses and the foundations are in place, more skilled labour will become involved in the installation process. Approximately fifty (50) percent of the workers will consist of unskilled labourers. The remaining workers will include semi-skilled and skilled positions such as project managers, engineers, forepersons, drivers, equipment operators, and electricians. Skills will vary depending on the tasks involved, with more skilled labour required for specialized activities such as the installation of electrical equipment in the substation. These crews will have specific tasks such as land clearing, foundation installation, tower assembly and erection, conductor stringing between towers, land restoration, and tree pruning.

2.5 Contracted Workers

It is anticipated that the contractor is likely to engage sub-contractors during construction phase. However, numbers and types of contractors/subcontractors and the likely number of project workers to be employed or engaged by each contractor/subcontractor is not known. Project workers will not be engaged through brokers, intermediaries or agents.

3 ASSESSMENT OF KEY POTENTIAL LABOR RISKS

3.1 Project Activities

Construction of this type of project will generally include the following activities:

- Clearance of Right of Way-This involves the process of clearing the designated path for the transmission line, ensuring there are no obstructions that may hinder construction.
- Cutting Trees and Vegetation -Removing trees and high vegetation along the transmission line route is necessary to maintain clearances and prevent interference with the line.
- Construction of Access Roads -Access roads are built to provide entry points for construction vehicles and equipment, especially in difficult terrains like mountainous/hilly regions.
- Land Clearing and Construction of Foundation-Clearing of land and preparing the foundation sites for tower installation re crucial steps in the construction process.
- Soil Stabilization-Ensuring the stability of the soil in the foundation areas and along the route of the transmission line is essential for long-term integrity of the structure.
- Erection of Towers-The installation of towers along the route to support the overhead transmission lines is a significant construction activity.
- Stringing Conductors-Once the towers are erected, the conductors (wires) are installed and strung between them to allow for the transmission of electricity.
- Reinstatement and Revegetation-After construction, impacted areas will need to be rehabilitated, reinstated, and revegetated to restore the environment to its original state as much as possible.

By carefully planning and executing project activities in a systematic coordinate manner, and the successful completion of the 400kV OHL project in the challenging terrain can be achieved while adhering to safety, environmental, and quality standards.

3.2 Labour Risks Associated with the Project

Labour risks associated with the construction activities of transmission lines are crucial considerations for the health and safety of the workers involved. Below are the key occupational health and safety hazards that have been identified in the project.

Table 3—1. Key Labor Risks and Mitigation Measures

Key Labor Risk	Sources of Risks	Mitigation
SEA/SH	Sexual harassment, exploitation and abuse: there are several concerns on the potential for GBV, increased risk of abuse and exploitation for vulnerable women workers, increased risk of sexual exploitation and violence of persons involved in the labor related activities. Thus, all staff and contracted workers should sign a CoC outlining expected standards of behaviour in this regard and attend an awareness session on the same including the consequences of such actions.	<ul style="list-style-type: none"> ■ Implement the Project Gender-Based Violence Action Plan (GBVAP). ■ Conduct sensitization on SEA/SH and GBV services to project workers and project affected stakeholders. ■ Require project workers to sign a code of conduct (CoC), as a condition of employment for the project and before signing on to work on the project, with key prohibitions on SEA/SH. ■ Implement safe and confidential grievance channels that are easily accessible to all stakeholders will also be provided for all Project stakeholders to enable them report on SEA/SH incidents. ■ The project will undertake GBV risk assessment and mapping of GBV services. ■ Periodically update GBV assessment of potential risks that may arise in relation to primary suppliers. ■ Application of WB GBV Guidance Notes in work procedures and interactions, especially those addressing social aspects. ■ Special GRM for GBV/SEA/SH cases will be set up.
Child labor	The need to earn an income may force underage children to seek employment at construction sites as casual laborers in preparing areas where electricity lines and networks will be established.	<ul style="list-style-type: none"> ■ Contractors need to verify the age of the workers using the national identity card, or selection based on the contractor’s previous profile, maintain ID copies at worksites, do periodic labor inspection, etc.
Forced labor	Forced labor in form of debt bondage and trafficking for little or no pay. The victims are the most vulnerable—women and girls forced into prostitution, migrants trapped in debt bondage, and sweatshop or farm workers kept there by clearly illegal tactics and paid little or nothing. Forced labor is likely.	<ul style="list-style-type: none"> ■ The Project will not allow any form of forced, child labor, slavery, servitude, trafficking and all applicable ESS2 provisions. ■ All contractors will be held liable for the implementation of this LMP, with the EEP-PIU having overall responsibility to monitor its implementation.

		<ul style="list-style-type: none"> ■ Apply enhanced due diligence for evaluation of forced labor risks in the project. ■ Bidders will be required to provide a Forced Labor Performance Declaration (covering past performance), and a Forced Labor Declaration (covering future commitments to prevent, monitor and report on any forced labor). ■ The employment of project workers will be based on the principle of fair treatment. ■ The project management will hold sensitization meetings on forced labour and conflict resolution mechanisms. ■ Subproject Environmental and Social Management Plans (ESMPs) will clearly forbid the use of forced labor.
Security risks	<p>Security remains a paramount concern in urban centers due to the ongoing insurgency by Al-Shabaab and other armed groups, or internal communities' conflicts. This poses a threat to the security of workers and property throughout the project life cycle.</p>	<ul style="list-style-type: none"> ■ Security Risk Management Plan prepared for the project will be updated to cover activities under the project before the commencement of sub project activities. ■ Put in place security and safety provisions to ensure the security of personnel and community members, and to conduct worker training on appropriate behavior during the implementation of the project. ■ In addition to flexibility with regard to the selection of the project sites subject to the security situation, the project implementation will consider contingency plans and require the contractors to put in place standard operating procedures to undertake the project activities in case of restricted sites' access. ■ The EEP-PIU will work closely with the Ministry of Interior to ensure worker security. ■ Project teams will seek security approval and clearances from the project coordinator. ■ Project teams will be periodically subjected to security

		<p>awareness campaigns.</p> <ul style="list-style-type: none"> ■ Project teams will have alternative communication devices, such as two-way radios or satellite phones in areas with limited or no cellular network coverage ■ Use local leaders as part of the project implementation committee members.
Occupational Health and safety (OHS) risks	OHS issues related to component 1	<p>Integrity of Workplace Structures</p> <ul style="list-style-type: none"> ■ Permanent and recurrent places of work should be designed and equipped to protect OHS: ■ Surfaces, structures and installations should be easy to clean and maintain and not allow for accumulation of hazardous compounds. ■ Buildings should be structurally safe, provide appropriate protection against the climate, and have acceptable light and noise conditions. ■ Fire resistant, noise-absorbing materials should, to the extent feasible, be used for cladding on ceilings and walls. ■ Floors should be level, even, and non-skid. <p>Severe Weather and Facility Shutdown</p> <ul style="list-style-type: none"> ■ Workplace structures should be designed and constructed to withstand the expected elements for Somali and have an area designated for safe refuge, if appropriate. ■ Standard Operating Procedures (SOPs) should be developed for project or process shutdown, including an evacuation plan. ■ Drills to practice the procedure and plan should also be undertaken annually. <p>Workspace and Exit</p>

		<ul style="list-style-type: none"> ■ The space provided for each worker, and in total, should be adequate for safe execution of all activities, including transport and interim storage of materials and products. ■ Passages to emergency exits should be unobstructed at all times. Exits should be clearly marked to be visible in total darkness. The number and capacity of emergency exits should be sufficient for safe and orderly evacuation of the greatest number of people present at any time, and there should be a minimum two exits from any work area. ■ Facilities also should be designed and built taking into account the needs of disabled persons. <p>Fire Precautions</p> <ul style="list-style-type: none"> ■ The workplace should be designed to prevent the start of fires through the implementation of fire codes applicable to industrial settings. Other essential measures include: ■ Equipping facilities with fire detectors, alarm systems, and fire-fighting equipment. The equipment should be maintained in good working order and be readily accessible. It should be adequate for the dimensions and use of the premises, equipment installed, physical and chemical properties of substances present, and the maximum number of people present. ■ Provision of manual firefighting equipment that is easily accessible and simple to use. ■ Fire and emergency alarm systems that are both audible and visible. <p>Lavatories and Showers</p> <ul style="list-style-type: none"> ■ Adequate lavatory facilities (toilets and washing areas) should be provided for the number of people expected to work in the facility and allowances made for segregated facilities, or for
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		<p>indicating whether the toilet facility is “In Use” or “Vacant”. Toilet facilities should also be provided with adequate supplies of hot and cold running water, soap, and hand drying devices.</p> <ul style="list-style-type: none"> ■ Where workers may be exposed to substances poisonous by ingestion and skin contamination may occur, facilities for showering and changing into and out of street and work clothes should be provided. <p>Potable Water Supply</p> <ul style="list-style-type: none"> ■ Adequate supplies of potable drinking water should be provided from a fountain with an upward jet or with a sanitary means of collecting the water for the purposes of drinking. ■ Water supplied to areas of food preparation or for the purpose of personal hygiene (washing or bathing) should meet drinking water quality standards. <p>Clean Eating Area</p> <ul style="list-style-type: none"> ■ Where there is potential for exposure to substances poisonous by ingestion, suitable arrangements are to be made for provision of clean eating areas where workers are not exposed to the hazardous or noxious substances <p>Lighting</p> <ul style="list-style-type: none"> ■ Workplaces should, to the degree feasible, receive natural light and be supplemented with sufficient artificial illumination to promote workers’ safety and health and enable safe equipment operation. Supplemental ‘task lighting’ may be required where specific visual acuity requirements should be met. ■ Emergency lighting of adequate intensity should be installed and automatically activated upon failure of the principal
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		<p>artificial light source to ensure safe shut-down, evacuation, etc.</p> <ul style="list-style-type: none"> ■ Safe Access ■ Passageways for pedestrians and vehicles within and outside buildings should be segregated and provide for easy, safe, and appropriate access. ■ Equipment and installations requiring servicing, inspection, and/or cleaning should have unobstructed, unrestricted, and ready access. ■ Hand, knee and foot railings should be installed on stairs, fixed ladders, platforms, permanent and interim floor openings, loading bays, ramps, etc. ■ Openings should be sealed by gates or removable chains. ■ Covers should, if feasible, be installed to protect against falling items. ■ Measures to prevent unauthorized access to dangerous areas should be in place. <p>First Aid</p> <ul style="list-style-type: none"> ■ Sub projects should ensure that qualified first-aid can be always provided. Appropriately equipped first-aid stations should be easily accessible throughout the place of work. ■ Eye-wash stations and/or emergency showers should be provided close to all workstations where immediate flushing with water is the recommended first- aid response. ■ Remote sites should have written emergency procedures in place for dealing with cases of trauma or serious illness up to the point at which patient care can be transferred to an appropriate medical facility. <p>Work Environment Temperature</p>
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		<ul style="list-style-type: none"> ■ The temperature in work, rest room and other welfare facilities should, during service hours, be maintained at a level appropriate for the purpose of the facility.
	<p>OHS issues during component 1 and 2 construction activities.</p>	<p>Train workers on OHS Risks and Awareness to Minimize Risks.</p> <ul style="list-style-type: none"> ■ OHS measures should be designed and implemented to address: (a) identification of potential hazards to project workers; (b) provision of preventive and protective measures, including elimination of hazardous conditions or substances; (c) training of project workers and maintenance of training records; (d) documentation and reporting of occupational accidents, diseases and incidents; (e) emergency prevention and preparedness and response arrangements to emergency situations; and (f) remedies for adverse impacts such as occupational injuries, disability and disease. ■ Contractors will be required to prepare and implement Occupational Health & Safety Plans (OHSP) following the World Bank Group General Environment, Health, and Safety (EHS) Guidelines as well as the EHS Guidelines for Electric Power Transmission and Distribution, adopt a code of conduct for all workers and establish GRM (accessible for direct and contracted workers) before commencement of the civil works. ■ A workers' GRM will be put in place specifically to manage the various employers (contractors, national and private agencies)/workers related grievances, including but not limited to: misconduct, wages, overtime, injuries/accidents, worker relations with neighboring communities, SEA/SH incidents against or by project workers, etc. <p>Live Power Lines</p>

		<ul style="list-style-type: none"> ■ Only allowing trained and certified workers to install, maintain, or repair electrical equipment; ■ Deactivating and properly grounding live power distribution lines before work is performed on, or in proximity, to the lines; ■ Ensuring that live-wire work is conducted by trained workers with strict adherence to specific safety and insulation standards. Qualified or trained employees working on transmission or distribution systems should be able to achieve the following: <ul style="list-style-type: none"> ■ Distinguish live parts from other parts of the electrical system; ■ Determine the voltage of live parts; ■ Understand the minimum approach distances outlined for specific live line voltages; ■ Ensure proper use of special safety equipment and procedures when working near or on exposed energized parts of an electrical system. ■ Workers should not approach an exposed energized or conductive part even if properly trained unless: <ul style="list-style-type: none"> ■ The worker is properly insulated from the energized part with gloves or other approved insulation; or, ■ The energized part is properly insulated from the worker and any other conductive object; or, ■ The worker is properly isolated and insulated from any other conductive object (live-line work). ■ Where maintenance and operation is required within minimum setback distances, specific training, safety measures, personal safety devices, and other precautions should be defined in a health and safety plan; ■ Workers not directly associated with power transmission and distribution activities who are operating around power lines or power substations should adhere to local legislation, standards,
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		<p>and guidelines relating to minimum approach distances for excavations, tools, vehicles, pruning, and other activities; and</p> <ul style="list-style-type: none"> ■ Minimum hot stick distances may only be reduced provided that the distance remaining is greater than the distance between the energized part and a grounded surface. <p>Working at Height on Poles and Structures</p> <ul style="list-style-type: none"> ■ Testing structures for integrity prior to undertaking work; ■ Implementation of a fall protection program that includes training in climbing techniques and use of fall protection measures; inspection, maintenance, and replacement of fall protection equipment; and rescue of fall-arrested workers, among others; ■ Establishment of criteria for use of 100 percent fall protection (typically when working over 2 meters above the working surface, but sometimes extended to 7 meters, depending on the activity). The fall protection system should be appropriate for the tower structure and necessary movements, including ascent, descent, and moving from point to point; ■ Installation of fixtures on tower components to facilitate the use of fall protection systems; ■ Provision of an adequate work-positioning device system for workers. Connectors on positioning systems should be compatible with the tower components to which they are attached; ■ Hoisting equipment should be properly rated and maintained, and hoist operators properly trained; ■ Safety belts should be of not less than 16 millimeters (mm) (5/8 inch) two-in- one nylon or material of equivalent strength. Rope safety belts should be replaced before signs of aging or fraying of fibers become evident;
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		<ul style="list-style-type: none"> ■ When operating power tools at height, workers should use a second (backup) safety strap; ■ Signs and other obstructions should be removed from poles or structures prior to undertaking work; ■ An approved tool bag should be used for raising or lowering tools or materials to workers on structures. <p>Electric and Magnetic Fields</p> <ul style="list-style-type: none"> ■ Occupational EMF exposure should be prevented or minimized through the preparation and implementation of an EMF safety program including the following components: ■ Identification of potential exposure levels in the workplace, including surveys of exposure levels in new projects and the use of personal monitors during working activities; ■ Training of workers in the identification of occupational EMF levels and hazards; ■ Establishment and identification of safety zones to differentiate between work areas with expected elevated EMF levels compared to those acceptable for public exposure, limiting access to properly trained workers; ■ Implementation of action plans to address potential or confirmed exposure levels that exceed reference occupational exposure levels developed by international organizations such as the International Commission on Non- Ionizing Radiation Protection (ICNIRP), and the Institute of Electrical and Electronics Engineers (IEEE). Personal exposure monitoring equipment should be set to warn of exposure levels that are below occupational exposure reference levels (e.g., 50 percent). Action plans to address occupational exposure may include limiting exposure time through work rotation,
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		<p>increasing the distance between the source and the worker, when feasible, or the use of shielding materials.</p> <p>Motor Vehicle Safety</p> <ul style="list-style-type: none"> ■ Adoption of best transport safety practices across all aspects of project operations with the goal of preventing traffic accidents and minimizing injuries suffered by project personnel and the public. Measures should include: <ul style="list-style-type: none"> ○ Emphasizing safety aspects among drivers; ○ Improving driving skills and requiring licensing of drivers; ○ Adopting limits for trip duration and arranging driver rosters to avoid overtiredness; ○ Avoiding dangerous routes and times of day to reduce the risk of accidents; ○ Use of speed control devices (governors) on trucks, and remote monitoring of driver actions; ○ Regular maintenance of vehicles and use of manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction or premature failure. ○ Where the project may contribute to a significant increase in traffic along existing roads, or where road transport is a significant component of a project, recommended measures include: <ul style="list-style-type: none"> ○ Minimizing pedestrian interaction with construction vehicles; ○ Collaboration with local communities and responsible authorities to improve signage, visibility and overall safety of roads, particularly along stretches located near schools or other locations where children may be
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		<p>present. Collaborating with local communities on education about traffic and pedestrian safety (e.g., school education campaigns);</p> <ul style="list-style-type: none"> ○ Coordination with emergency responders to ensure that appropriate first aid is provided in the event of accidents; ○ Using locally sourced materials, whenever possible, to minimize transport distances. Locating associated facilities such as worker camps close to project sites and arranging worker bus transport to minimizing external traffic; and ○ Employing safe traffic control measures, including road signs and flag persons to warn of dangerous conditions. <p>Working Environment Temperature</p> <ul style="list-style-type: none"> ■ Monitoring weather forecasts for outdoor work to provide advance warning of extreme weather and scheduling work accordingly. ■ Adjustment of work and rest periods according to temperature stress management procedures provided by ACGIH, depending on the temperature and workloads; ■ Providing temporary shelters to protect against the elements during working activities or for use as rest areas; ■ Use of protective clothing; and ■ Providing easy access to adequate hydration such as drinking water or electrolyte drinks and avoiding consumption of alcoholic beverages. <p>Ergonomics, Repetitive Motion, Manual Handling</p>
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		<ul style="list-style-type: none"> ■ Facility and workstation design with 5th to 95th percentile operational and maintenance workers in mind; ■ Use of mechanical assists to eliminate or reduce exertions required to lift materials, hold tools and work objects, and requiring multi-person lifts if weights exceed thresholds. ■ Selecting and designing tools that reduce force requirements and holding times, and improve postures; ■ Providing user adjustable workstations; ■ Incorporating rest and stretch breaks into work processes and conducting job rotation. ■ Implementing quality control and maintenance programs that reduce unnecessary forces and exertions; and ■ Taking into consideration additional special conditions such as left-handed persons.
	<p>OHS issues during component 1 and 2 operation activities.</p>	<p>Training of workers on OHS Risks and Awareness to Minimize the Risks.</p> <ul style="list-style-type: none"> ■ OHS measures will be designed and implemented to address: (a) identification of potential hazards to project workers; (b) provision of preventive and protective measures, including elimination of hazardous conditions or substances; (c) training of project workers and maintenance of training records; (d) documentation and reporting of occupational accidents, diseases and incidents; (e) emergency prevention and preparedness and response arrangements to emergency situations; and (f) remedies for adverse impacts such as occupational injuries, disability and disease. ■ Contractors will be required to prepare and implement Occupational Health & Safety Plans (OHSP) following the World Bank Group General Environment, Health, and Safety (EHS) Guidelines as well as the EHS Guidelines for Electric

		<p>Power Transmission and Distribution, adopt a code of conduct for all workers and establish GRM (accessible for direct and contracted workers) before commencement of the civil works.</p> <ul style="list-style-type: none"> ■ A workers' GRM will be put in place specifically to manage the various employers (contractors, national and private agencies)/workers related grievances, including but not limited to: misconduct, wages, overtime, injuries/accidents, worker relations with neighboring communities, SEA/SH incidents against or by project workers, etc. <p>In addition to: Live Power Lines; Working at height on poles and structures; Electric and magnetic fields; Exposure to chemicals; Motor vehicle safety; Working Environment Temperature; Ergonomics, Repetitive Motion; and Manual Handling; The following OHS risks are also likely during operation phase of the project:</p> <p>Exposure to Physical Hazards from Use of Heavy Equipment and Cranes</p> <ul style="list-style-type: none"> ■ Injury or death can occur from being trapped, entangled, or struck by machinery parts due to unexpected starting of equipment or unobvious movement during operations. Recommended protective measures include: <ul style="list-style-type: none"> ○ Designing machines to eliminate trap hazards and ensuring that extremities are kept out of harm's way under normal operating conditions. Examples of proper design considerations include two-hand operated machines to prevent amputations, or the availability of emergency stops dedicated to the machine and placed in strategic locations. Where a machine or equipment has an exposed moving part or exposed pinch point that may endanger the safety of
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		<p>any worker, the machine or equipment should be equipped with, and protected by, a guard or other device that prevents access to the moving part or pinch point. Guards should be designed and installed in conformance with appropriate machine safety standards.</p> <ul style="list-style-type: none"> ○ Turning off, disconnecting, isolating, and de-energizing (Locked Out and Tagged Out) machinery with exposed or guarded moving parts, or in which energy can be stored (e.g., compressed air, electrical components) during servicing or maintenance, in conformance with a standard such as CSA Z460 Lockout or equivalent ISO or ANSI standard. ○ Designing and installing equipment, where feasible, to enable routine service, such as lubrication, without removal of the guarding devices or mechanisms. <p>Noise</p> <ul style="list-style-type: none"> ■ No employee should be exposed to a noise level greater than 85 dB(A) for a duration of more than 8 hours per day without hearing protection. In addition, no unprotected ear should be exposed to a peak sound pressure level (instantaneous) of more than 140 dB(C). ■ The use of hearing protection should be enforced actively when the equivalent sound level over 8 hours reaches 85 dB(A), the peak sound levels reach 140 dB(C), or the average maximum sound level reaches 110dB(A). Hearing protective devices provided should be capable of reducing sound levels at the ear to at least 85 dB(A). ■ Although hearing protection is preferred for any period of noise exposure more than 85 dB(A), an equivalent level of protection can be obtained, but less easily managed, by
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		<p>limiting the duration of noise exposure. For every 3 dB(A) increase in sound levels, the ‘allowed’ exposure period or duration should be reduced by 50 percent.</p> <ul style="list-style-type: none"> ■ Prior to the issuance of hearing protective devices as the final control mechanism, use of acoustic insulating materials, isolation of the noise source, and other engineering controls should be investigated and implemented, where feasible ■ Periodic medical hearing checks should be performed on workers exposed to high noise levels. <p>Fire and Explosions</p> <p>Fires and or explosions resulting from ignition of flammable materials or gases can lead to loss of property as well as possible injury or fatalities to project workers. Prevention and control strategies include:</p> <ul style="list-style-type: none"> ■ Storing flammables away from ignition sources and oxidizing materials. Further, flammables storage area should be: ■ Remote from entry and exit points into buildings. ■ Away from facility ventilation intakes or vents. ■ Have natural or passive floor and ceiling level ventilation and explosion venting. ■ Use spark-proof fixtures. ■ Be equipped with fire extinguishing devices and self-closing doors and constructed of materials made to withstand flame impingement for a moderate period. ■ Providing bonding and grounding of, and between, containers and additional mechanical floor level ventilation if materials are being, or could be, dispensed in the storage area. ■ Where the flammable material is mainly comprised of dust, providing electrical grounding, spark detection, and, if needed, quenching systems.
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		<ul style="list-style-type: none"> ■ Defining and labeling fire hazards areas to warn of special rules (e.g., prohibition in use of smoking materials, cellular phones, or other potential spark generating equipment) ■ Providing specific worker training in handling of flammable materials, and in fire prevention or suppression. <p>Work in Confined Spaces</p> <ul style="list-style-type: none"> ■ Confined spaces can occur in enclosed or open structures or locations. Serious injury or fatality can result from inadequate preparation to enter a confined space or in attempting a rescue from a confined space. Recommended management approaches include: ■ Engineering measures should be implemented to eliminate, to the degree feasible, the existence and adverse character of confined spaces. ■ Permit-required confined spaces should be provided with permanent safety measures for venting, monitoring, and rescue operations, to the extent possible. The area adjoining an access to a confined space should provide ample room for emergency and rescue operations. ■ Access hatches should accommodate 90% of the worker population with adjustments for tools and protective clothing. The most current ISO and EN standards should be consulted for design specifications. ■ Prior to entry into a permit-required confined space: ■ Process or feed lines into the space should be disconnected or drained, and blanked and locked-out. ■ Mechanical equipment in the space should be disconnected, de-energized, locked-out, and braced, as appropriate. ■ The atmosphere within the confined space should be tested to assure the oxygen content is between 19.5 percent and 23
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		<p>percent, and that the presence of any flammable gas or vapor does not exceed 25 percent of its respective Lower Explosive Limit (LEL); and</p> <ul style="list-style-type: none"> ■ If the atmospheric conditions are not met, the confined space should be ventilated until the target safe atmosphere is achieved, or entry is only to be undertaken with appropriate and additional PPE. ■ Safety precautions should include Self Contained Breathing Apparatus (SCBA), lifelines, and safety watch workers stationed outside the confined space, with rescue and first aid equipment readily available; ■ Before workers are required to enter a permit-required confined space, adequate and appropriate training in confined space hazard control, atmospheric testing, use of the necessary PPE, as well as the serviceability and integrity of the PPE should be verified. Further, adequate and appropriate rescue and/or recovery plans and equipment should be in place before the worker enters the confined space. <p>Lone and Isolated Workers</p> <ul style="list-style-type: none"> ■ A lone and isolated worker is a worker out of verbal and line of sight communication with a supervisor, other workers, or other persons capable of providing aid and assistance, for continuous periods exceeding one hour. The worker is therefore at increased risk should an accident or injury occur. ■ Where workers may be required to perform work under lone or isolated circumstances, Standard Operating Procedures (SOPs) should be developed and implemented to ensure all PPE and safety measures are in place before the worker starts work. SOPs should establish, at a minimum, verbal contact
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		<p>with the worker at least once every hour, and ensure the worker has a capability for summoning emergency aid; and</p> <ul style="list-style-type: none"> ■ If the worker is potentially exposed to highly toxic or corrosive chemicals, emergency eyewash and shower facilities should be equipped with audible and visible alarms to summon aid whenever the eyewash or shower is activated by the worker and without intervention by the worker. <p>Emergency Response Plans</p> <ul style="list-style-type: none"> ■ Sub Project shall prepare and implement an emergency response plan, during a critical events including natural disasters, severe weather, pandemics and infectious diseases, facility emergencies, acts of workplace violence, civil disturbances, IT events, operational events, and corporate/crisis communication events to ensure employees' safety and minimize the impact on critical operations. All-hazards approach to risk assessment will be used to ensure all bases are covered and preparedness for all kinds of threats.
Discrimination	Discrimination in relation to recruitment and employment of project workers is a potential risk. Such discrimination includes potential inappropriate treatment or harassment of Project workers related to gender, age, disability, ethnicity, sexual identity/orientation, or religion; potential exclusion or preferences with respect to recruitment, hiring, termination of employment, working conditions, or terms of employment made based on personal characteristics unrelated to inherent work requirements; in training and development provision.	<ul style="list-style-type: none"> ■ The employment of project workers will be based on the principle of equal opportunity and fair treatment. ■ Inclusive consultations and focus groups particularly to ensure participation of women and other vulnerable groups. ■ No discrimination with respect to any aspects of the employment relationship. ■ Project management will hold sensitization meetings on resources planning and conflict resolution mechanisms. ■ The contracts with third parties will include non-exclusion requirements as part of the monitoring system.

Violation of workers' right	The violation of workers' rights could occur through inadequate compensation of consultants and contracted workers to be engaged, requirement for direct and contracted staff to work for long working hours and denial of holidays or leave requests.	<ul style="list-style-type: none"> ■ All workers (including those of the contractor and subcontractors) will, as part of their induction, receive training on worker rights in line with ESS2 and ILO core Conventions to ensure that positive benefits around understanding labour rights are enhanced. ■ All workers (including those of the contractor and subcontractors) will have contracts which clearly state the terms and conditions of their employment and their legal rights.
Labor disputes over terms and Conditions of employment	The likely cause for labor disputes includes demand for limited employment opportunities, labor wages/rates and delays of payment, discrimination in labor recruitment, disagreement over working conditions (particularly overtime payments and adequate rest breaks), and health and safety concerns about the work environment. Further, there is a risk that employers may retaliate against workers for demanding legitimate working conditions, or raising concerns regarding unsafe or unhealthy work situations, unfairness at work, or any grievances raised, and such situations could lead to labor unrest and work stoppage.	<ul style="list-style-type: none"> ■ Project management will prepare the Grievance Redress Mechanism (GRM) to address labor grievances. ■ Constitute the Grievance Redress Committees (GRC)s. ■ Awareness creation for the workers on their rights and obligation. ■ Supervise of labor activities by government entities.
Disease transmission	Spread of HIV/AIDS and increase of STI/STDs in the area.	<ul style="list-style-type: none"> ■ ESIA's and the SMPs will include measures to prevent the spread of disease and minimize outbreaks. ■ Carry out periodic HIV/AIDS awareness programs for workers and the beneficiary community. ■ Distribution of condoms to workers and neighboring communities. ■ The project team should use the services of local area HIV/AIDS service providers to undertake community

		outreaches. ■ Carryout voluntary HIV/AIDS testing.
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4 OVERVIEW OF LABOR LEGISLATION

The 1994 Federal Constitution of Ethiopia is the foundation for occupation, health, and safety. It has numerous articles that ensure the protection of citizens and workers from environmental and work-related hazards. In particular, Article 42 of the Constitution outlines specific rights related to labour, emphasizing the protection and welfare of workers. Key provisions under Article 42 includes the rights of workers to form associations, to have improved conditions of employment, to improve their economic well-being, to have limits on their working hours, to receive remuneration for public holidays, and to work in a healthy and safe environment.

The relevant labour laws, proclamations, and directives applicable to the implementation of the LMP to address labour related risks in the electricity project are:

- Labour Proclamation No.1156/2019
- Federal Civil Servants Proclamation 1064/2017
- Proclamation No.568/2008, Right to Employment of Persons with Disability.
- Occupational Safety and Health Directive, 2008 (Federal Ministry of Labour and Social Affairs).
- National Comprehensive COVID-19 management Handbook 2020 (MOH).
- National Comprehensive Guideline for HIV/AIDS Prevention 2018.

Workers and Employers relations are chiefly governed by the basic principles of rights and obligations stipulated under the Labour Proclamation No. 1156/2019. The purposes of the labour Proclamation No. 1156/2019 are stated as follows:

- Ensuring that the worker-employer relations are governed by basic principles of rights and obligations with a view to enabling workers and employers to secure durable industrial peace, sustainable productivity, and competitiveness.
- Creating a working system that guarantees the rights of workers and employers to freely establish their respective associations.
- Outlining and defining procedures for the expeditious settlement of labour disputes; and
- Creating a favorable environment for investment and achievement of national economic goals.

The labour proclamation governs the contract of employment between an employer and an employee. The proclamation clearly indicates the duties and responsibilities of the three parties: employer, employee and the government inspectors as stakeholders. There are OHS directives and guidelines used by OHS inspectors and safety officers to ensure the protection of workers. The proclamation defines an employer as a person or an undertaking, or any entity established under a united management for the purpose of carrying on any commercial, industrial, agricultural, construction or any other lawful activity, which employs one or more natural persons pursuant to the labour proclamation.

Minimum Wages

There is no national minimum wage requirement under Ethiopian law. Remuneration levels are typically determined through labour agreements between the employer and the employee or by collective agreements.

Wage Payments and Deductions

A labour agreement will specify the form and amount of remuneration, which will be paid at least once a month. Unless the contrary is agreed, wages shall be paid on working days and at the place of work directly to the employee or to a person delegated by the employee. Deductions from wages shall only be made in accordance with the Labour Proclamation, collective agreement, work rules, a court order or a written agreement of the employee.

Child Labour

The Labour Proclamation sets a statutory minimum age for employment at 15 years. It is prohibited to employ minors under the age of 15. The proclamation designates employees between the ages of 15 and 18 as young workers, and special protection is accorded to them. Young workers are prohibited from employment in activities which on the accounts of its nature or due to the condition in which they are carried out, endangers their life or health.

The Proclamation provides the below illustrative list of employment which young workers should not be engaged in:

1. Work in transport of passengers or good by road, railway, air and internal waterway, docksides and warehouse involving heavy weight liftings, pulling, or pushing or any other related type of labour.
2. Work connected with electric power generation plants transformers or transmission lines.
3. Underground work such as mines, quarries, and similar works.
4. Work in sewers and digging tunnels.
5. Night work between 10p.m. and 6 a.m.
6. Overtime work.
7. Work on weekly rest days; and
8. Work on public holidays.

Nevertheless, the prohibitions listed under 1-4 above would not fall under the prohibited works for young workers if it is done as a part of a learning course in vocational schools that are approved and inspected by competent authorities.

To limit the risk of child labour and in compliance with the regulations, the transmission line project in Ethiopia will not employ any worker under the age of 18 years. To this end, the employer and contractors will be required to verify the identity and age of all workers. This will require workers to provide official documentation, which could be in the form of birth certificates, national identity cards, passports, driver's license, medical records, or school record. If a person under the age of 18 years is discovered working on the project, immediate measures will be taken to terminate their employment or engagement in a reasonable manner.

Workday/Work Week/Work Hours

The Labour Proclamation 1156/2019 requires normal working hours to be limited to eight (8) hours a day, and 48 hours a week. The hours of work should be spread equally over the working days of a week and where the nature of the work so requires, hours may be shortened in any one of the working days and the difference distributed over the remaining days of the week without extending the daily limits of eight hours by more than two hours.

A worker is entitled to a weekly rest period consisting of not less than 24 uninterrupted hours in the course of each period of seven days. And in the absence of a specific provision in a collective agreement, the weekly rest period shall, whenever possible, fall on Sunday and should be synchronized for all workers in the project. In circumstances where it is impractical for the weekly rest day to be on a Sunday, another day of the week can be designated as the weekly rest day.

If the nature of the employer's work makes it challenging for employees to take their weekly rest day, the employer must provide four working days of rest within a month as an alternative. Managerial employees are also entitled to their usual hours and days of rest as per their employment agreements.

The project intends to follow these regulations so as to give employees an adequate opportunity for rest and recuperation thus maintaining their well-being as well as a good work-life balance.

Rest Breaks

The employees will have a meal break each workday. The break shall be at least 30 minutes long.

Overtime Requirements

Work done in excess of the normal daily hours and within the conditions of the law is deemed to be overtime under the proclamation. A worker will not be compelled to work overtime. Nonetheless, overtime work is permitted under the proclamation whenever the employer is unable to resort to other measures and where there is:

- a) Actual or threatened accident.
- b) Force majeure (or a natural act)
- c) Urgent work
- d) Substitution of absent workers assigned on work that runs continuously without interruption.

Overtime Work Limitations

Pursuant to Article 67 of the Labour Proclamation, overtime work for an employee is limited to a maximum of 4 hours per day and 12 hours per week. This restriction aims to ensure that employees are not overburdened with excessive working hours beyond the regular schedule.

In the case of managerial employees, normal hours of work is a working hour as agreed by the parties in their contract and overtime work is a work in excess of the work agreed in

the contract. Managerial workers are expected to fulfill their duties and responsibilities, which may include working overtime, when necessary, unless there are valid reasons for not doing so,

The project will adhere to the regulations regarding overtime so as to balance the need for the employer with the protection of the employee's well-being and labor rights. The project will establish clear limitations on overtime hours and will define expectations for managerial employees to ensure a harmonious and compliant work environment.

Time Off/Leaves of Absence

Article 77 of the Proclamation states that employees are entitled to an annual leave with pay under the following directives:

- Duration of Annual leave – An employee is entitled to uninterrupted annual leave with pay, which should not be less than 16 working days. The calculation for annual leave entitlement is as follows: (a) for the first year of service, the employee is entitled to 16 working days of annual leave, (b) for every additional two years of service, the entitlement increases by one working day, i.e. 16 working days plus one working day for every additional two years of service.
- Additional Leave for Hazardous or Unhealthy Work–Employers and employees can agree to provide additional annual leave with pay for workers engaged in hazardous or unhealthy work through the company's collective agreement, work rules or individual employment contracts.
- Annual Leave Utilization and Payment–According to the Proclamation, unutilized annual leave cannot be carried forward for more than two years.
- Termination of Employment – Upon termination of employment, the employee is entitled to receive payment in lieu of any unused annual leave.
- Qualifying Period of Service – To determine the qualifying period required for annual leave entitlement, 26 days of service are considered to be equivalent to one month of employment.

Holiday Pay

Ethiopia has twelve public holidays-historical memorial days and holidays of Christians and Moslems origin that are enshrined in law.

These days are: *7 January (Orthodox Christmas Day), 19 January (Timket) Eid-ul-Adha, 2 March (Battle of Adowa), Orthodox Easter Monday, Coptic Good Friday, Mulud, 5 May (Patriots Day), 28 May (National Day), 11 September (Ethiopian New Year/Coptic New Year), 27 September (Finding of the True Cross), and End of Ramadan.*

The Proclamation directs that employees are to get a paid leave on public holidays. If an employee works on a public holiday, the law provides they will be paid hourly wages multiplied by two for each hour of work. If a public holiday coincides with another public holiday, it will be considered as a single holiday and payments shall only be made to the employee with this assumption.

Family and other Medical Leave

The Proclamation provides provisions for family and other medical leave as follows:

1. Paternal Leave – Pursuant to Article 88(3) of the Proclamation, an employee is entitled to three consecutive days of paternity leave.
2. Marriage and Bereavement Leave – an employee is entitled to three working days of leave with pay in the event of the employee’s marriage or the death of the employee’s spouse, descendants, ascendants, or other relatives up to the second degree by affinity or consanguinity. For exceptional and serious events such as bereavement, where additional leave is necessary, an employee is entitled to five days of leave without pay.
3. Limitations on marriage and bereavement leave – the Labour Proclamation specifies that this type of leave, whether for marriage or bereavement may only be granted twice in a budget year.

Disability Leave

There is no provision under Ethiopian law dealing with disability leave.

Non-discrimination and equal opportunity

The employer has a duty under the Labour Proclamation to respect the dignity of his employees. The proclamation defines discrimination as any distinction, exclusion or preference made on the basis of nationality, race, color, sex, religion, political opinion, national origin, social origin, HIV/AIDS status, disablement, and others, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation. Employers are prohibited from discriminating employees based on these grounds.

Sexual Harassment and Sexual Violence

The Labour Proclamation prohibits sexual harassment and sexual assault in the workplace. In particular, section three, Article 14(h) prohibits sexual harassment or sexual assault by any worker or employer or employee manager at the workplace. Additionally, under subsection two, on terminations of contract by a worker, under article 32(b), it provides that a worker who has been a victim of sexual harassment or sexual violence by an employer or employee manager can terminate their contract without any prior notice.

4.1 Occupational Health and Safety (OHS) Legal Framework in Ethiopia

Ethiopia has legal framework on OHS. The Constitution, under Article 42 subsection 2 of the guarantees the rights of workers to a healthy and safe work environment. This constitutional provision forms the foundation for ensuring occupational safety and health for all workers in Ethiopia. Other than the constitution, there are other regulations on OHS, these include: The National Occupational Health Policy and Strategy, Occupational Health and Safety Directive (2008), Occupational Health and Safety Policy and Procedure Manual, and On Work Occupational Health and Safety Control Manual for Inspectors (2018) which guides inspectors in conducting assessments and enforcing OHS regulations.

The health and safety of workers while at work are protected with provisions from the labour Proclamation No.1156/2019. It provides measures to be taken to prevent occupational accidents and injuries. The employer has the obligation to safeguard the safety and health of workers, particularly to:

- i.** Comply with the occupational health and safety requirements provided for in the proclamation.
- ii.** Take appropriate steps to ensure that workers are properly instructed and notified concerning the hazards of their respective occupations; and assign safety officer; and establish an occupational health and safety committee.
- iii.** Provide workers with protective equipment, clothing and other materials and instruct them of their use.
- iv.** Register employment accidents and occupational diseases and report same to the labour inspection service.
- v.** Arrange, according to the nature of the work, at his own expense for the medical examination of newly employed workers and for those workers engaged in hazardous work, as may be necessary except for HIV/AIDS.
- vi.** Ensure that the workplace and premises of the undertaking does not pose threats to the health and safety of workers.
- vii.** Take appropriate precautions to ensure that all the processes of work in the undertaking shall not be a source or cause of physical, chemical, biological, ergonomic and psychological hazards to the health and safety of the workers.

Workers are required to comply with the requirements of the law. Thus, any worker engaged in this project has the obligation to:

- i.** Cooperate in the formulation of work rules to safeguard the worker's health and safety, and implement same;
- ii.** Inform forthwith to the employer any defect related to the appliances used and incidents of injury to health and safety of workers that he is aware of in the undertaking.
- iii.** Report to the employer any situation which he may have reason to believe could present a hazard and which he cannot prevent on his own, and any incident of injury to health which arises in the course of or in connection with work;
- iv.** Make proper use of all safety devices and other appliances furnished for the protection of his health and safety or for the protection of the health and safety of others;
- v.** Observe all health and safety instructions issued by the employer or by the Competent Authority.

Continuous assessment of OHS risks will be done throughout the project to prevent workplace accidents and injuries. Employers will further continuously provide Personal Protective Equipment (PPE) and establish safety and security measures to ensure a safe working environment. Regular training sessions for workers will be held to enhance their skills and knowledge of occupational health and safety practices, emergency procedures, and to ensure the proper use of safety equipment to mitigate risks effectively.

5 RESPONSIBLE STAFF

5.1 EAPP-PIU

A Project Implementation Unit (PIU) has been established in the Eastern African Power Pool (EAPP) and is staffed by personnel (environmental and social specialist) who will be in charge of ensuring that the LMP is implemented in accordance with the World Bank ESSs. The EAPP/PIU will be responsible for the following:

- Implementing this labour management procedure to its (EAPP) workers including direct workers, contracted workers and primary supply workers.
- Ensuring that EEP-PIU implement the LMP to its direct workers
- Provide oversight and ensure that EEP-PIU implements the LMP

5.2 EEP-PIU

The PIU of the EEP will be staffed by personnel who will be in charge of ensuring that the LMP is implemented. The EEP-PIU will be responsible for the following:

- Implementing this LMP to project workers
- Ensure that contractor(s) responsible for the construction of the transmission line prepare their labor management procedure, in compliance with this LMP.
- Monitor that the Contractors are meeting obligations towards contracted and sub-contracted workers as included in the General Conditions of Contract the Bank Standard Bidding Documents, and in line with ESS2 and national labour/laws
- Ensure that the grievance mechanism for the project is implemented and functional
- Monitor implementation of contractor's labour management procedures
- Monitor training of the project workers on LMP

5.3 Supervising Consultant

The Supervision Consultant will oversee contractors' labour and safety performance daily, on the behalf of the Employer (EAPP-PIU and EEP-PIU) and in line with the LMP. The ESMP requires the Supervision Consultant to employ specialists for such oversight and to report on performance to EAPP/PIU and EEP-PIU monthly.

5.4 Contractors

Contractors will need to incorporate all mitigation measures mentioned in this LMP and ESIA in their employment contracts and operations. Additionally, all the bidding documents will include a condition for contractors to have capacity to manage potential ESS risks/impacts. The contractors for the project will have specific responsibilities regarding labour management and occupational safety. The contractors' responsibilities are summarized below:

- **Contractor Experts:** Contractors will employ or appoint qualified social, labor, and occupational safety experts to prepare and implement project-specific labor management procedures and occupational health and safety plans. These experts will also manage subcontractor performance.
- **Supervise Subcontractors:** Contractors will supervise the implementation of labor management procedures and occupational health and safety plans by their subcontractors.
- **Record Keeping:** Maintain records of the recruitment and employment process

of contracted workers.

- **Communicate Employment Conditions:** Clearly communicate job descriptions and employment conditions to contracted workers.
- **Grievance Mechanism:** Develop and implement a grievance mechanism for contracted and subcontracted workers. Contractors will address grievances received from these workers.
- **Review and Reporting:** Have a system for regular review and reporting on labor, occupational safety, and health performance.
- **Training:** Deliver regular induction (including social induction) and HSE (Health, Safety, and Environment) training to employees.
- **Code of Conduct:** Ensure that all contractor and subcontractor workers understand and sign the Code of Conduct before commencing work.

Additionally, after the bidding process is completed and the contractors are known, the labor management procedure can be updated to include additional details about the companies as necessary. This ensures that all parties involved are aware of their responsibilities and commitments regarding labor management and occupational safety throughout the project.

6 POLICIES AND PROCEDURES

The employment of project workers will be based on labour laws and regulation in Ethiopia and the principles of non-discrimination and equal opportunity including all aspects of hiring, pay, terms of employment, working conditions, access to training, advancement, or termination of employment, among other employment relationships.

The project-specific Code of Conduct will be signed by the direct project workers. In accordance with the national labor laws and this labor management procedures, contractors will develop labor management protocols. While not a comprehensive list of standards, the guidelines and practices listed below serve as a representation of the fundamental ones. To guarantee that every employee is treated fairly, the contractors will create the following policies, which EEP-PIU, EAPP-PIU and a supervisory consultant will oversee:

- Recruitment will be straightforward, open and non-discriminatory.
- Applications for work will only be considered if submitted through official application channels set up by the contractors.
- Clear job descriptions will be provided and will clearly explain the skill sets required for each post.
- All workers will sign written contracts elaborating the terms and conditions of work and will have the substance clarified to them. Specialists will sign the work contract.
- The affected communities, settlements, and municipalities will be given preference when hiring unskilled workers.
- The contract workers will not be required to pay a hiring fee.
- Contracts will be developed in a language that is understandable to both parties based on the employee's and employer's origins. In addition to written documentation, workers who may have questions will receive an oral explanation of the terms and conditions of employment.
- Language-related communication issues may occur. For the foreign crew, interpretation may be necessary.
- A residency permit is required for foreign workers in order to be able to work in Ethiopia.
- EEP-PIU will stipulate in contracts that all employees of contractors (and sub-contractors) must be at least eighteen years old.

6.1 Overview of Labour Management Procedures

A summary of indicative procedures to develop and implement the LMP policies is provided below.

Occupational Health and Safety (OHS)

As outlined in the Environmental and Social Impact Assessments reports prepared thus far for various sub-projects, the sub-project will require the development and implementation of safety plans, including the Environmental and Social Management Plan (ESMP) and OHS procedures. These plans will follow the standards of the Labour Act (LR. 31/2020) and the World Bank's environmental health and safety guidelines. The EEP-PIU will ensure that all workers are protected from potential health and safety risks, and contractors will be

required to have their own OHS policies and plans in line with these guidelines. Key elements of the OHS measures include:

- Identifying potential hazards to workers
- Providing preventive and protective measures
- Training workers and maintaining training records
- Documenting and reporting accidents and incidents
- Preparing for emergencies
- Providing remedies for work-related injuries and fatalities

Labor Influx: To reduce the impact of labor influx, the project will require contractors to prioritize hiring local unskilled workers from nearby communities. All workers will sign a code of conduct (CoC) before starting work, which will address issues like gender-based violence (GBV) and sexual exploitation or harassment (SEA/SH).

Labor Disputes: To prevent disputes, the project will ensure fair terms and conditions for all workers, in line with relevant laws. A grievance redress mechanism (GRM) will be set up to quickly address any complaints from workers (both direct and contracted). The project will also respect workers' rights to join labor unions and freely associate.

Non-Discrimination: The employment of project workers will follow principles of equal opportunity and fairness, with no discrimination in recruitment, hiring, wages, benefits, or training. The project will also comply with the law on gender equality in the workplace, including provisions for maternity and sick leave. Adequate and suitable toilet and washing facilities will be provided, separate for male and female workers, as required by local customs. These standards will be included in contracts with third-party suppliers and part of the project's monitoring system.

Security Risks: Some project areas may have security concerns. The EEP-PIU will work closely with the Security to ensure the safety of workers and project facilities, aligning with the project's Security Management Plan.

GBV and SEA/SH: Given the potential risks, sexual harassment, exploitation, and abuse among workers is a concern. All staff and contracted workers will be required to sign a code of conduct (CoC) that outlines expected behavior and the consequences for violations. EEP-PIU will arrange for training on GBV and SEA, possibly with support from development partners. A separate grievance mechanism will be established to address complaints related to GBV and SEA.

Child Labor: For civil works, all workers must be at least 18 years old. This will be a requirement in all contracts with civil work contractors. The EEP-PIU and contractors will ensure that no workers between the ages of 15-18 are employed.

Forced Labor: The project will have a zero-tolerance policy for forced labor in any form, including child labor, slavery, servitude, and trafficking. All contractors will be held accountable for adhering to the Labor Management Procedures (LMP), with the EEP-PIU overseeing the LMP's implementation.

Direct project workers (EEP-PIU and EAPP-PIU employees) are expected to conduct field visits and inspections in relation to the transmission line project. Thus, it is unlikely that direct project workers will engage in activities that pose a significant danger to their health and safety. When performing on-site work, EEP-PIU and EAPP-PIU employees are required by established health and safety protocols to wear appropriate personal protective equipment (PPE). This covers safety footwear, helmets, eye protection, and high visibility vests.

The employees of the construction contractor will be exposed to the primary health and safety hazards. Contractors and primary suppliers submitting bids for the project will need to show that they can manage risks to health and safety and provide documentary proof. Following contract award, contractors must submit an occupational health and safety plan and labor management processes that comply with the ESMP. The contractors will guarantee that subcontractors comply with their occupational health and safety plans.

The contractors will create thorough plans for occupational health and safety that address the following, among other things: The contractor will set up a work permit system and conduct a risk assessment of the operations. This is necessary since the contractors will have to handle a variety of tasks with varying levels of risk. The granting of authorization will consider the worker's background, education, the activity to be done and possession of equipment. Most of the risks are associated with excavation work, tower lifting and erection, stringing, etc. Every kind of job should be included in the work permits and risk assessment procedures.

Risk of injury during construction exists based on the particulars of the project. The ESIA analysis will determine the risks and suggest that construction contractors be obliged to put risk assessment and mitigation procedures in place. It is necessary to have trained first responders and extended emergency supplies on hand to provide emergency medical care. Contractors are required to notify the EEP-PIU, and Supervision consultant in case of any accidents, a register of the same should also be maintained.

Any major event (labor, health and safety, or security incident, accident, or circumstance) will be reported to the Bank by EAPP-PIU as soon as practically possible, but no later than five calendar days following the event. These occurrences include work stoppages or other forms of labor unrest, significant workplace accidents or fatalities, community people hurt by project-related injuries, or property damage. Within 30 calendar days following the incident, EAPP-PIU and EEP-PIU shall compile a report on the incident and the corrective measures and submit it to the Bank.

A code of conduct shall be drawn up and implemented by the construction contractor. A supervision consultant will review and approve the code of conduct before implementation. The company's core values, and overall working culture shall be reflected in the Code of Conduct. The contractor is obligated to provide periodic evaluation on their performance on labour, occupational health, and safety issues in monthly reports to the supervising

consultant. The findings of any inspections or audits carried out by any governmental body will be reported to EAPP-PIU and EEP-PIU.

6.2 Age Of Employment

Refer to chapter 4.3 on details regarding:

- The minimum age for employment on the project
- The process that will be followed to verify the age of project workers
- The procedure that will be followed if underage workers are found working on the project
- The procedure for conducting risk assessments for workers aged between the minimum age and 18

The Project will only engage persons with a minimum age of eighteen (18) and this will be enforced during recruitment and monitored by the EEP-PIU and contractors.

- The project will only hire individuals who are at least 18 years old. This policy will be strictly enforced during recruitment, with monitoring carried out by the Project Implementation Unit (PIU) and contractors.
- Contractors will verify the identity and age of all workers by requiring official documents such as a birth certificate, national ID card, passport, or school/medical records. They will also collaborate with community members to confirm the age and behavior of local hires, keeping a record of this information.
- Workers who are 18 or older will carry out their tasks in a way that does not interfere with their education or harm their health, or their physical, mental, spiritual, moral, or social development.
- There will be regular coordination with labor inspectors and relevant authorities, who will conduct both announced and surprise inspections of the project work sites.
- If a child under the minimum working age is found, immediate action will be taken to end their employment in a responsible manner, ensuring the child's best interests are prioritized.

Age Verification Process: Before any labor is engaged, the worker's age will be verified and documented. Since official ID systems are limited in Ethiopia, age verification methods might include:

- Checking the date of birth on documents such as a birth certificate, national ID, or other reliable records when available.
- Obtaining written confirmation from a medical professional, parent, or guardian.
- Verifying with local community leaders or trusted community sources.

6.3 TERMS AND CONDITIONS

Refer to chapter 4.3 on details regarding:

- Specific wages, hours and other provisions that apply to the project
- Maximum number of hours that can be worked on the project
- Any collective agreements that apply to the project. When relevant, provide a list of agreements and describe key features and provisions
- Other specific terms and conditions

Written Employment Contracts: Each worker will receive a written contract detailing:

- The worker's name, address, occupation, age, and sex.
 - The employer's name and address.
 - The nature and duration of the contract.
 - The worker's work hours and location.
 - The worker's pay and benefits.
 - The procedure for suspension or termination of the contract.
- Wherever necessary, the contract and terms will be communicated in a language both parties understand, with an oral explanation provided for workers who might have difficulty understanding the written terms.

Contract Termination Notice: Either party may terminate the employment contract by providing written notice.

- Manual workers: at least 10 days' notice.
- Non-manual workers: at least 30 days' notice.
- No notice is required if the contract is for less than one month. In cases where workers breach confidentiality or violate the Code of Conduct, termination should happen immediately, even if the contract duration is longer than one month.

Minimum Wage: Although the official minimum wage system is not currently functioning, the market rate for each job type in different regions will be used to determine fair compensation for project workers.

Work Hours: Normal working hours for project workers will not exceed 8 hours a day or 48 hours a week. Any overtime worked beyond these hours (up to 12 additional hours per week) will be paid at an increased rate.

Weekly Rest: Workers are entitled to one day of rest each week, typically on Fridays, which should be at least 24 consecutive hours. Workers will also have a rest day on public holidays recognized by the State.

Annual Leave: After one full year of continuous service, workers are entitled to 15 days of paid leave annually.

Maternity Leave: Female workers who have been with the employer for at least six months and present a medical certificate confirming their expected confinement date are entitled to 14 weeks of maternity leave with half pay. At least six weeks of the leave must be taken after the confinement.

Nursing Breaks: Female workers nursing their children are entitled to two one-hour breaks per day for up to one year after childbirth. These breaks are considered working hours and will be paid accordingly.

Deductions from Pay: No deductions will be made from a worker's pay, except those allowed by law, such as for repaid advances. Employers cannot require workers to make

cash payments or give gifts for employment or other reasons related to the terms of their contract.

Death Benefit: If a worker dies while employed, the employer will pay the worker's heirs at least 15 days' worth of wages as a death benefit to assist with funeral expenses.

Medical Treatment for Injured or Sick Workers: The employer is responsible for arranging, at their own expense, transport to the nearest hospital for any worker who is injured or ill and cannot be treated on-site.

Collective Agreements: If collective agreements exist between the employer and workers, the relevant provisions will be applied, ensuring the workers' rights and terms of employment are respected.

7 GRIEVANCE MECHANISM

The project will provide a grievance mechanism for both direct and contracted workers to raise workplace concerns. Workers will be informed about the grievance process during recruitment, and safeguards will be put in place to protect them from any retaliation for using it. The system will be accessible to all workers and allow for anonymous complaints. It will be clear that workers can submit grievances without fear of reprisal, and their confidentiality will be respected.

Typical workplace grievances include disputes over wages, working conditions, health and safety, or delays in payment. The grievance mechanism will be responsive, impartial, and swift in addressing workers' concerns, ensuring that all issues are resolved fairly.

National Appeal Process: If a labor dispute arises, it can be submitted to the labor inspector for mediation under the national Labour Act.

Handling of GBV-Related Grievances: To avoid further harm or stigma, grievances related to gender-based violence (GBV) will be handled with extra care. The complainant's consent will guide the process, and they will be given information about accessing medical, psychological, legal, and emergency support services.

All staff involved in grievance resolution will be trained to handle sensitive GBV cases with discretion and care, ensuring that reports are made confidentially and appropriately referred for further support.

Security Risks: Details about security risks that contractors might face while performing their work, including potential threats from third parties not associated with the project, will be monitored and reported.

Tracking of Worker Grievances: All grievances will be documented, including the occurrence date, issue raised, and any actions taken. Unresolved grievances from previous reports will also be tracked for follow-up actions.

Understanding Grievances and Their Categories

A grievance is essentially a complaint or concern raised by an individual or group who feels affected by the actions of a company. These concerns can arise from real or perceived impacts caused by the company's operations. Whether it's a genuine issue or a misunderstanding, grievances are handled in the same way, following the same process.

Grievances can vary. They might involve actual damage or injury, general concerns about the company's activities, or impacts (or perceived impacts). Based on the specific characteristics of the project and its workforce, several types of grievances have been identified:

Internal Grievances

These grievances are related to employees, both direct and indirect (including local workers and migrant workers employed through contractors). Common complaints include:

- Issues with wages, salary, benefits, or company policies
- Delays in payment of salaries
- Gender discrimination
- Problems related to worker organizations
- Accommodation issues
- Health and safety concerns
- Long working hours

The workers grievance mechanism will include:

- A procedure to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline
- Stipulated timeframes to respond to grievances
- A register to record and track the timely resolution of grievances
- A responsible department to receive, record and track resolution of grievances.

The workers grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. The mechanism will be based on the following principles:

- The process will be transparent and allow workers to express their concerns and file grievances.
- There will be no discrimination against those who express grievances, and any grievances will be treated confidentially.
- Anonymous grievances will be treated equally as other grievances, whose origin is known.
- Management will treat grievances seriously and take timely and appropriate action in response.
- Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of “suggestion/complaint boxes”, and other means as needed.

Direct Workers’ GRM Structure

To mitigate the risks related to direct workers, a GRM for Direct Workers will be established.

First Level

- The contractor will appoint a GO who will be responsible to receive, consider and address in a timely manner the grievances, including the concerns on unaccounted working hours and lack of compensation for overtime, delay in/non-payment of salaries. If the issue cannot be resolved at the first level within 7 working days, then it will be escalated to the second level.

Second Level

- The Owners Engineer social specialist will be responsible to receive, consider and address in a timely manner the grievances, including the concerns on unaccounted working hours and lack of compensation for overtime, delay in/non-payment of salaries. If the issue cannot be resolved at the first level within 7 working days,

then it will be escalated to the second level.

Third Level

- Social Specialist at the EEP-PIU will be responsible to receive grievances escalated from the first level, consider and address in a timely manner the grievances, including the concerns on unaccounted working hours and lack of compensation for overtime, delay in/non-payment of salaries. If the issue cannot be resolved at the second level within 7 working days, then it will be escalated to the next level.

Fourth Level

- Project Coordinator is a third level GRM for direct workers if there is a situation in which there is no response from the Social Specialist or if the response is not satisfactory then complainants and feedback providers have the option to appeal directly to the Project Coordinator to follow up on the issue. The complaints should be considered, and feedback provided within the next 7 working days.

EAPP-PIU and EEP-PIU will require contractors to develop and implement a grievance mechanism for their workforce including sub-contractors, prior to the start of the project. The construction contractors will prepare their labor management procedures before the start of civil works, which will also include detailed description of the workers grievance mechanism.

Grievance Resolution for Contracted Workers

Contractors must set up their own grievance mechanisms to address issues raised by contracted workers. A Grievance Officer (GO) appointed by the contractor will handle the complaints and work to resolve them. If the issue is not addressed within 7 working days, it will be escalated to the EEP-PIU Social Specialist. Social specialist of EEP-PIU will serve as Grievance Officer (GO) to file the grievances and appeals of the project workers. He/She will be responsible to coordinate with relevant departments/organization and persons to facilitate addressing these grievances. If the grievance is not resolved at the local level, the Social Specialist will escalate it further, depending on the situation to the EEP-PIU Project Manager. The workers grievance mechanism will include the following procedures: Steps and procedures for Grievance Reporting and Redress:

Lodging Grievances

- Any individual or group directly impacted by the project can lodge a grievance in writing or through designated communication channels including suggestion boxes, emails, telephone hotline or verbally.
- Grievances shall include specific details, such as the date, nature of the grievance, individuals involved, and desired outcome.
- There shall be a Grievance Officer (appointed by contractor) to whom anyone shall lodge their grievances.

Initial Assessment and Acknowledgement

- Upon receiving a grievance, the Grievance Officer (at each level of receipt) will conduct an initial assessment to determine the seriousness and validity of the complaint.
- Once the grievance is received, a grievance number shall be allocated and communicated to the grievant. This communication shall also serve as an acknowledgement of the grievance. In case the grievance is assessed to be out of the scope of the LMP-GRM, a communication towards the same shall be made to the grievant, and an alternative mode of redressal shall be suggested. As part of this acknowledgement a tentative timeline for the redressal of the grievances shall be identified, in keeping with the process below. This acknowledgement shall be provided on the same day as the grievance is received.
- The Grievance Officer will acknowledge the receipt of the grievance within a specified timeframe.
- If the grievance falls outside the scope of the grievance mechanism, the complainant will be informed and offered an alternative way to address the issue. The acknowledgment will include an expected timeline for resolution.

Investigation

- Once recorded, the Grievance Officer will determine which department or individual is responsible for addressing the issue. They will then investigate the cause of the grievance, interviewing concerned parties if necessary. The goal is to understand the issue fully and find a suitable solution.
- An impartial investigation will be conducted to gather relevant information and identify potential solutions. Investigations will be undertaken by the GO.
- The Grievance Officer will facilitate dialogue between the parties involved and work towards a mutually agreeable resolution.
- The resolution timeframe will be defined, and all parties must be kept informed of the process.

Resolution, Escalation and Closure Allocation of Responsibility

- Once the grievance is received and recorded, based on the subject and issue, the Grievance Officer shall identify the department, contractor or personnel responsible for resolving the grievance.
- The Grievance Officer and concerned department shall then undertake an enquiry into the facts and figures relating to the grievance. This shall be aimed at establishing and analyzing the cause of the grievance and subsequently identifying suitable mitigation measures for the same. The analysis of the cause will involve studying various aspects of the grievance such as the employee's history, frequency of the occurrence, management practices, etc.

- As part of this investigation, the grievance officer may also undertake confidential discussions with the concerned parties to develop a more detailed understanding of the issue at hand. The site investigation shall be completed in no more than 10 working days of receiving the grievance. Resolution, Escalation and Closure Based on the understanding thus developed, the grievance officer, in consultation with the concerned departments, shall identify a suitable resolution to the issue.
- This resolution shall be accordingly communicated to the grievant within 10 working days of completing the site investigation. In case the issue is beyond the purview of the grievance officer, it should be escalated to the Owner's Engineer.
- A communication regarding the same shall be provided to the grievant. The Owner's Engineer shall in turn endeavor to resolve the grievance within 10 working days of the escalation. If, however, the Owner's Engineer is not able to identify an adequate resolution for the grievance, then an adequate response shall be given to the grievant along with a suggested alternative resolution to the grievance which would be to escalate the grievance to the EEP-PIU. If at any stage, the grievant is not satisfied with the solution, s/he may choose to ask for an escalation of the grievance to the next level.
- If the grievance is unable to be resolved at the lowest level, there shall be an escalation path in the organization for it to be resolved at Owners Engineer and eventually EEP-PIU.

Confidentiality and Non-Retaliation

- Confidentiality of the grievance process will be maintained to protect the identity of individuals raising concerns.
- Non-retaliation against individuals lodging grievances will be strictly prohibited and mechanisms will be in place to safeguard whistleblowers.

Documentation and Reporting

- Detailed reports of all grievances, investigations, and resolutions will be maintained for monitoring and reporting purposes.
- Regular reports on grievance handling and outcomes will be prepared by and shared with relevant stakeholders.

Compliance and Review

- The grievance mechanism will comply with Ethiopia labour laws, international standards, project requirements, and relevant regulations.
- Regular reviews and evaluations of the grievance mechanism will be conducted to assess its effectiveness and identify areas for improvement.

Communication and Feedback

- Multiple communication channels such as dedicated hotlines, email addresses, and grievance boxes, will be established for stakeholders to provide feedback on the grievance process.
- Feedback received will be used to make continuous improvements to grievance mechanism.

Updating Records: The grievance register will be updated weekly, tracking the status of each grievance. Once a grievance is resolved, it will be marked as closed, with details on how it was handled. If the grievance was anonymous, a summary of the issue and its resolution will be posted publicly.

Monitoring of the GRM Implementation

To ensure grievances are addressed effectively, the mechanism will be monitored regularly. The monitoring will include:

- Auditing the implementation of the grievance process
- Tracking consultations with stakeholders
- Recording and following up on feedback
- Evaluating the effectiveness of engagement activities

Grievance Reporting: The performance of the grievance mechanism will be reviewed quarterly. Reports will be analyzed, and a Grievance Redress Report (GRR) will be prepared to summarize the findings.

7.1 GBV (SEA/SH) Grievance

There will be a separate reporting and documentation mechanisms for GBV (SEA and SH) cases that are discrete from the standard GRM, that will be utilized by survivors or their representatives, to ensure all GBV cases are reported and handled confidentially. All workers/staff will be made aware of these mechanisms through awareness sessions and staff inductions respectively. Social/GBV experts in EEP-PIU and EAPP-PIU supported by the social expert from the supervising consultant and contractor's end will be the focal point and will establish the system to handle these complaints that will include reference to confidentiality, safety, and survivor-centered approach. All registration of the data will be confidential and anonymized.

The supervisory consultant will oversee the contractor's grievance recording and handling, reporting any issues to EEP-PIU and EAPP-PIU in their monthly progress reports. An EAPP-PIU and EEP-PIU representative in charge of the project GRM, will monitor the implementation. The workers grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. The following principles shall be the basis for this mechanism:

- Employees will be able to voice their concerns and register grievances through an open and transparent process; there won't be any prejudice against those who do so, and any complaints will be handled in confidence.
- Grievances without a known origin will be handled in the same manner as

those with an identifiable origin.

- All project workers, both direct and contracted, will have easy access to information about the grievance mechanism, including through notice boards, “suggestion/complaint boxes,” and other means.
- Management will take grievances seriously and respond in a timely and appropriate manner.
- The grievance mechanism for project workers will not preclude workers from utilizing the conciliation procedures outlined in Labour Code.

7.2 World Bank Grievance Redress System

Communities and individuals who believe they have been adversely affected by a World Bank (WB) supported project may submit their complaints to existing project-level grievance redress mechanism described above, or the WB’s Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB’s independent Inspection panel which determines whether harm occurred or could occur, because of WB non-compliance with its policies and procedures. For more information on how to submit complaints to the World Bank’s Grievance Redress Service (GRS), please visit <https://worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

8 CONTRACTOR MANAGEMENT

8.1 Contractor Selection Process

The Bank's ESF will be used by EEP-PIU and EAPP-PIU for tenders and contracts. EEP-PIU and EAPP-PIU will ensure that contractual provisions they put in place relating to contractors for the management of labor issues, including occupational health and safety, are in line with ESS2, paragraph 32 and GN 32.1. Further, the procedure for managing and monitoring the performance of contractors, will be as provided for in ESS2, paragraph 32 and GN 32.1

Up-to-date records related to the various aspects of the project will be diligently kept and maintained by the contractor. The employees will be provided with documented evidence of all payments made, including pension contributions, or other entitlements, irrespective of the workers terms of engagement (fixed term contract, full-time, part-time, or temporary). Compliance with these reporting obligations is essential for complying with World Bank standards and for promoting transparency, accountability, and ethical labour practices within the project environment. The following records, among others, will be kept:

- Labour conditions: This includes records of all workers engaged under the project. Contracts, worker induction and training records including Codes of Conduct (CoC). Hours worked, remuneration details and deductions (including overtime). Collective bargaining agreements, if applicable.
- Safety records: Recordable safety incidents, including lost time incidents and medical treatment cases. The Project will also document first aid cases and high potential near misses. Details of remedial and preventative activities undertaken such as revised job safety analyses, new equipment, or additional skills training.
- Workers-Number of workers employed. Origin of workers (e.g. community workers and nonlocal nationals). Gender, age, with evidence demonstrating the absence of child labour. Skills level categorization (unskilled, skilled, supervisory, professional management).
- Training-Dates of the training sessions. Topics covered during training and numbers of trainees attending each training session.
- Security Risks-Details of any security risks the project may face during project execution. Identification of threats from external third parties that could impact project operations.
- Worker Grievances-Details of any grievances raised by workers, including the dates of the occurrence and date submitted, nature of the grievance, actions taken and corresponding dates, resolution status and date of resolution (if applicable), pending follow-up actions, listing of grievances received since the previous report and unresolved grievances from previous reports.

In the course of choosing design and build contractors who will use contract workers, the following data may be examined by EAPP-PIU and EEP-PIU, and/or the supervisory consultant:

- Publicly available information on labour law violation by the contractor
- Labour management procedures governing the running of the business

- Proof of registration by the government and other relevant bodies or authorities
- The position of OHS on the organogram and qualification of the officers
- Incidents and accidents records maintained by the contractor
- Copies of past agreements with suppliers and contractors, demonstrating the presence of clauses and conditions that align with ESS2.

With an emphasis on contractors adhering to their contractual terms, the Supervision Consultant will oversee and monitor Contractor performance with regard to contracted labour. This will be done through; audits, spot checks on records from the government labour department and on the worksites and the labor management records and reports created by contractors which include.

- Representative sample of employment contracts or agreements between third parties and contracted workers.
- Records of grievances received and resolved.
- Reports of safety inspections, incidents, accidents and fatalities
- Records on implementation of corrective actions.
- Records of incidents of non-compliance with national law.
- Employee training records.

Contractual Provisions and Non-Compliance Remedies: The EEP-PIU shall incorporate the agreed labor management requirements as specified in the bidding documents into contractual agreements with the contractor, together with appropriate non-compliance remedies (such as the provision on withholding 10% of payment to the contractor in case of non-compliance with relevant environmental, social, health and safety requirements; removal of personnel from the works). In the case of subcontracting, the EEP-PIU will require the contractor to include equivalent requirements and non-compliance remedies in their contractual agreements with subcontractors.

Performance Monitoring: The EEP-PIU shall establish resources and procedures for managing and monitoring the performance of the contractor in relation to the LMP. The EEP-PIU will ensure that the contracts with the consultants explicitly set out the monitoring responsibilities for the contractors' performance on labor and working conditions on a daily basis. The monitoring may include inspections, and/or spot checks of project locations or work sites and/or of labor management records and reports compiled by the contractor. Contractors' labor management records and reports that should be reviewed would typically include the following:

- Representative samples of employment contracts and signed CoC;
- Grievances received from the community and workers and their resolution;
- Reports relating to fatalities and incidents and implementation of corrective actions;
- Records relating to incidents of non-compliance with national Labor Code and the provisions of the LMP; and
- Records of training provided for contracted workers to explain OHS risks and preventive measures.

9 PRIMARY SUPPLY WORKERS

9.1 Selection of Primary Suppliers

When choosing primary suppliers for the project, we will make sure they assess the risks of child labor, forced labor, and serious safety hazards. The Project Implementation Unit (PIU) and consultants will review and approve the selection of these suppliers based on their assessments. If necessary, the project will require specific terms regarding child labor, forced labor, and worker safety in all contracts and purchase orders. Specifically:

- The EEP-PIU will examine industry labor issues related to the goods and materials needed for the project, assess risks, and take action to minimize those risks.
- The EEP-PIU will monitor supplier performance to ensure that the proper procedures and mitigation measures are being followed and provide feedback on how things are going, including identifying new risks.
- All contracts and purchase orders with suppliers will include requirements for child labor, forced labor, and safety standards.

9.2 Remedial Process

If child labor, forced labor, or serious safety risks are identified, the EEP-PIU and consultants will require the primary supplier to take corrective action. These actions will be monitored periodically to evaluate their effectiveness. If the corrective measures aren't working, the EEP-PIU and consultants will, within a reasonable timeframe, switch to suppliers who can demonstrate compliance with the necessary standards.

This project is not likely to pose a significant risk of child or forced labor or serious safety issues in relation to primary suppliers.

10 RESOURCES

The project estimated funds to ensure that the planned LMP activities are implemented and monitored effectively is presented in table below.

Table 10—I. Estimated Cost Budget

LMP Activities	Units	No. of Units	Unit Cost, USD	Total Cost (USD)
Support the development of Labor Management Plans for all project offices and contractors	Months	10	10,000	100,000.00
Travel expenses of staff on LMP activities (supervision missions by the safeguards officers and EEP-PIU leadership) (monthly)	Quarterly	30	3,000	90,000.00
Training (contract management, CoC, GRM, GBV, etc.) for EEP-PIU, contractors and primary suppliers (1st year of implementation)	Months	12	LUMP SUM	100,000.00
Managing Workers GM	Months	40	2,000	80,000.00
Monitoring and Evaluation	Annually	3	20,000	60,000.00
Sub-total				430,000.00
Contingency (5%)				21,500.00
Total				451,500.00

II REFERENCES

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10. The World Bank, ESS2: labor and Working Conditions, Guidance Note 2 for Borrowers, June 2018.

12 ANNEX

12.1 ANNEX I: GUIDELINE ON CODE OF CONDUCT

This Code of Conduct (CoC) is prepared as part of the Labor Management Procedures (LMP) for the Project. This CoC will be signed by all contract workers recruited to deliver on any aspect of the project. The CoC will be adapted to the needs of the agency/institution. The CoC will be translated into Somali language (and as necessary) to ensure that each of the workers has clear understanding of the provisions and agrees to the terms. It will be signed by the worker, who will keep a copy, while the contractor/agency will keep the original signed document.

- A satisfactory CoC will contain obligations on all project workers (including sub-contractors) that are suitable to address the following issues, as a minimum. Additional obligations may be added to respond to particular concerns of the ministries, the location and the project sector or to specific project requirements.
- The CoC should be written in plain local language and signed by each worker following an orientation to indicate that they have:
 - Received a copy of the code
 - Had the code explained to them;
 - Acknowledged that adherence to this CoC is a condition of employment; and
 - Understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.
- The Contractor should conduct continuous awareness raising and training activities to ensure that workers abide by the CoC (such as through toolbox talks). The Contractor should also ensure that local communities are aware of the CoC and enable them to report any concerns or noncompliance.
- The issues to be addressed include:
 - Compliance with applicable laws, rules, and regulations of the jurisdiction;
 - Compliance with applicable health and safety requirements (including wearing prescribed personal protective equipment (PPE), preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment);
 - The use of illegal substances;
 - Non-Discrimination (for example on the basis of family status, ethnicity, race, gender, religion, language, marital status, birth, age, disability, or political conviction);
 - Interactions with community members (for example to convey an attitude of respect and non-discrimination);
 - Sexual harassment (for example to prohibit use of language or behaviour, in particular towards women or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate);
 - Violence or exploitation (for example the prohibition of the exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour);

- Protection of children (including prohibitions against abuse, defilement, or otherwise unacceptable behaviour with children, limiting interactions with children, and ensuring their safety in project areas);
- Sanitation requirements (for example, to ensure workers use specified sanitary facilities provided by their employer and not open areas);
- Avoidance of conflicts of interest (such that benefits, contracts, or employment, or any sort of preferential treatment or favours, are not provided to any person with whom there is a financial, family, or personal connection);
- Respecting reasonable work instructions (including regarding environmental and social norms);
- Protection and proper use of property (for example, to prohibit theft, carelessness or waste);
- Duty to report violations of this Code;
- No retaliation against workers who report violations of the Code, if that report is made in good faith.

This abbreviated CoC, which is part of the Labor Management Procedures (LMP) for the project, will be printed and placed in all facilities supported by the Project. It will be translated and shared in local languages depending on the project site.

DO:

- Treat community members and colleagues with respect regardless of gender, race, colour, language, religion, or other status.
- Report any violations of this CoC to workers' representative, HR or grievance redress committee. No employee who reports a violation of this CoC in good faith will be punished in any way.
- Wash hands, sanitize and observe social distancing at all times and follow WHO and Ethiopia updated guidelines.
- Seek healthcare if you experience any of the following symptoms (while at home or work): cough, fever and shortness of breath.
- Prevent avoidable accidents and report conditions or practices that pose a safety hazard or threaten the environment.
- Observe all security protocols to protect yourselves, your colleagues and clients from security risks
- Comply with all national and international laws

DON'T:

- Make unwelcome sexual advances to any person in any form.
- Have sexual interactions unless full and unequivocal consent is given and there is no form of material or other coercion.
- Use alcohol or narcotics during working hours
- Expose other people to the risk of infection in any form.
- Leave personal protective equipment lying around
- Employees, associates, and representatives, including sub-contractors and suppliers, without exception.

12.2 ANNEX 2. DRAFT CODE OF CONDUCT FOR ALL PROJECT AND CONTRACTED WORKERS

I, _____ acknowledge that adhering to environmental, social, health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing gender-based violence (GBV) and violence against children (VAC) is important. All forms of GBV or VAC are unacceptable in the workplace or when interacting with communities.

The organization considers that failure to follow ESHS and OHS standards or to partake in GBV or VAC activities, constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit GBV or VAC may be pursued if appropriate.

I agree that while working on the project I will:

- Attend and actively partake in training courses related to ESHS, OHS, HIV/AIDS, GBV and VAC as requested by my employer.
- Follow my employers' guidance on prevention of the spread of infectious diseases, including Covid-19;
- Follow my employers' guidance on security and safety, including not causing conflict or exposing myself, other colleagues, stakeholders including community members, project facilities or assets to risks;
- Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not participate in sexual contact or activity with children (anyone age 18 or under) – including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defence. Consent from the child is also not a defence or excuse.
- Not engage in any form of sexual harassment of a co-worker - for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior. E.g., looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody's sex life etc. Sexual harassment constitutes acts of serious misconduct and are therefore grounds for disciplinary measures, including summary dismissal
- Not engage in any form of sexual exploitation or abuse – for instance, exchanging money, employment, goods or services for sex or sexual favors, or making promises or favorable treatment dependent on sexual acts – or other forms of humiliating, degrading or exploitative behavior. This includes any project-related assistance due to community members. Sexual exploitation and sexual abuse constitute acts of serious misconduct and are therefore grounds for disciplinary measures, including summary dismissal;

- I will not engage in sexual misconduct, use the project resources or funds to exploit community members.
- Report any suspected or actual GBV or VAC by a fellow worker, whether employed by my organization or not or any breaches of this Code of Conduct through the reporting mechanism.
- The standards set out above are not intended to be an exhaustive list. Other types of sexually exploitive or sexually abusive behaviour may be grounds for administrative action.

With regard to children under the age of 18:

- Wherever possible, ensure that another adult is present when working in the proximity of children;
- Not invite unaccompanied children unrelated to my family into my home unless they are at immediate risk of injury or in physical danger;
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornographic material through any medium (see also "Use of children's images for work-related purposes" below);
- Refrain from physical punishment or discipline of children;
- Refrain from hiring children for domestic or other labor, which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities or places them at significant risk of injury;
- Comply with all relevant local legislation, including labor laws in relation to child labor;
- Use of children's images for work-related purposes;

When photographing or filming a child for work-related purposes, I must:

- Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images;
- Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used;
- Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive;
- Ensure images are honest representations of the context and the facts; and
- Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action, which could include:

- Informal warning;
- Formal warning;
- Additional training;
- Loss of up to one week's salary;

- Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months;
- Termination of employment; and
- Report to the police if warranted.

I hereby acknowledge that I have read the foregoing Individual Code of Conduct, agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, GBV and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to take action mandated by this Individual Code of Conduct may result in disciplinary action and may affect my on-going employment.

Signature: _____ Name _____
Title: _____ Date: _____