

KINGDOM OF CAMBODIA
NATION RELIGION KING

Ministry of Industry, Science, Technology & Innovation
Ministry of Public Works and Transport



Water Supply and Sanitation Acceleration Project
(WASAC) - P178417

LABOR MANAGEMENT PROCEDURES (LMP)

September 2023

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LIST OF ABBREVIATION

C-ESMP	Contractor's Environmental and Social Management Plan
CHS	Community Health and Safety
CoC	Codes of Conduct
DPD	Deputy Project Director
EA	Executing Agency
EHS	Environmental, Health and Safety Guideline
ES	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESSs	Environment and Social Standards
EU	European Union
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
IA	Implementing Agency
IDA	International Development Association
ILO	International Labor Organization
LMP	Labor Management Procedure
M&E	Monitoring and Evaluation
MISTI	Ministry of Industry, Science, Technology & Innovation
MoH	Ministry of Health
MPWT	Ministry of Public Works and Transport
ID	Identity Card
OHS	Occupational Health and Safety
PD	Project Director
PIU	Project Implementing Unit
PM	Project Manager
PMU	Project Management Unit
POM	Project Operations Manual
PPE	Personal Protective Equipment
PSC	Project Steering Committee
PST	Project Supporting Team
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SOP	Standard Operation Procedures
VAC	Violence Against Children
WB	World Bank
WHO	World Health Organization

PREFACE

This LMP has been prepared by the Ministry of Industry, Science, Technology & Innovation (MISTI) and the Ministry of Public Works and Transport (MPWT) with the support from national social safeguard consultants as part of the Environment and Social Management Framework (ESMF) for the Water Supply and Sanitation Acceleration Project (WASAC). This LMP will be applied to all investments to be financed by the World Bank (WB) Group for technical and/or financial support for WASAC. The LMP has been prepared in line with the Royal Government of Cambodia's (RGC's) Standard Operating Procedures (SOP) and the WB's Environment and Social Framework (ESF).

This LMP will help to ensure that the contractor and stakeholders should adhere to the guidelines while focusing on the overall OHS risks for the workers and other stakeholders while implementing the project. Civil works at individual work sites will likely involve a small (or medium) number of skilled and semi-skilled direct and contracted workers. Labor influx from nearby neighborhoods is expected, including local technical consultants and staff. Since the project will adopt a similar approach to the existing WaSSIP, it is very unlikely that communities will be involved in providing labor to the project.

I. INTRODUCTION

1. This Labor Management Procedure (LMP) is developed to manage labor risks and impacts under the Water Supply and Sanitation Acceleration Project (WASAC) implemented the Ministry of Industry, Science, Technology & Innovation (MISTI) and the Ministry of Public Works and Transport (MPWT). The LMP sets out the project's approach to meeting national requirements as well as the objective of the World Bank's Environmental and Social Framework, specific objective of the Environmental and Social Standard 2: Labor and Working Conditions (ESS2) and the Environmental and Social Standard 4: Community Health and Safety (ESS4).
2. The LMP helps identify main labor requirements and risks associated with the project and will help MISTI/MPWT determine the resources necessary to address project labor issues and facilitate planning and implementation of the project. The LMP is a living document which is initiated early in project preparation and will be reviewed and updated throughout development and implementation of the project.

II. SPECIFIC OBJECTIVES OF THE LMP

3. These Labor Management Procedures (LMP) have been developed to achieve the following specific objectives:
 - To highlight and promote workplace safety and health.
 - To promote the fair treatment, non-discrimination, and equal opportunity for project workers irrespective of sex, race or ethnic identity.
 - To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with the ESS2 of the World Bank ESF) and, contracted workers, and primary supply workers, as applicable.
 - To prevent the use of all forms of forced labor and child labor, Gender-based violence (GBV), violence against children (VAC)
 - To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
 - To provide project workers with accessible means to raise workplace grievances.
4. Implementation of the Project will require direct and contracted workers for civil works. The project will provide technical and capacity-building support to strengthen the component management teams to ensure robust outreach, targeting, enrolment, payments, and grievance redress, including support to promote women's employment. Trainings on technical and capacity-building can be conducted by the project's E&S safeguards consultants with the assistance from the WB's E&S safeguards specialists. Lessons learned will be documented to improve guidelines for the component management teams. The LMP covers the direct workers, contracted workers, and (where relevant) primary supply workers to be involved with the Project. The respective projects management units (PMUs) will ensure all the engaged contractors prepare Labor Management Plans for contracted works as part of their ESMPs. The approach will be assessed as part of the initial screening of Environmental and Social (E&S) risks and impacts carried out by the Project's E&S officers from MISTI/MPWT with the support from the project's E&S safeguards consultants.

III. OVERVIEW OF LABOR USE IN THE PROJECT

3.1. Overview of the workers involved in the project

5. The LMP applies to all Project workers. The ESS 2 categorizes the workers into four (4) categories:
 - a) **Direct workers:** refers to people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specially in relation to the project.
 - b) **Contracted workers:** refers to people employed or engaged through third parties to perform work related to core functions of the project, regardless of location. These could be either international or national workers.
 - c) **Primary supply workers:** refers to people employed or engaged by the Borrower's primary suppliers (primary supply workers).
 - d) **Community workers:** refers to people employed or engaged in providing community labor as a contribution to the project, generally voluntarily.
6. The LMP applies to all workers, whether full-time, part-time, temporary, seasonal, or migrant workers.
7. WASAC will ensure that no workers under the age of 18 years old are employed for any of the project activities. The LMP also covers the rights of direct workers for the project, which would include those persons hired directly by MISTI/MPWT, for whatever length of time, and for which the project has specific control over the work, working conditions, and treatment of the worker. These would include consultants hired to work for the project, persons engaged to conduct monitoring and evaluations, and persons hired to assist with community engagement, which might be needed for some indigenous communities (all direct workers). Civil servants working for the project, both full time or part time, are subject to the conditions and terms of their existing arrangements. ESS2 and the provisions of this LMP apply to them only with regard to the prevention of forced and child labor, and occupational health and safety. WASAC is expected to have the following type of workers (Table 1).

Table 1: Type of workers in WASAC

Category of workers based on ESS2	Characteristics of Project Workers	Number of Project Workers	Timing of Labor Requirements
Civil Servants	In central office of each PMU: Project Coordinator (1) Deputy Project Coordinator (1) Component Director (1) Component Manager (1) Administrative Officer (1) Institutional Development Officer (1) Engineers (3-4) Accounting and Finance (5) Procurement Officers (2) Monitoring and Evaluation Officer (1) IT and Public Relations Officer (1) Internal Auditors (2)	Total 68–75 24-25 in Central PMU of MISTI 24-25 in Central PMU of MPWT 4-5 in 2 provinces of MISTI 4-5 in 3 provinces of	Throughout entire project cycle

	<p>Environmental Safeguard Officer (1) Social Safeguard Officer (1) Gender Officer (1)</p> <p>In Each Province under each PMU: Team Leader (1) Deputy Team Leader (1) Members (2-3)</p>	MPWT	
Direct Workers	<p><u>Under Individual Contracts of Service</u> Two (2) National E&S supervision consultants, to assist the ministries in complying with ESF. Six (6) Engineering Consultants for both Water Supply and Sanitation for designs, feasibility study and supervision. Other consultants as needed</p>	8	Throughout entire project cycle
Contracted Workers	<p>From the experience of the current WaSSIP project the construction works will require contracted workers, which are likely to come from nearby neighborhoods. These would include foreign and local technical consultants and staff. Each site may employ workers ranging between 30 to 40 people, with the potential to require worker camps. It is expected that women will be employed as well as men for both the designated activities. The contractors will also be encouraged to give persons with disabilities and those from other vulnerable groups equal opportunity for employment, and equal wages for equal work under the project. If workers from the communities are engaged, all would be expected to be paid for their labor. Paid workers from the communities would be considered contracted workers.</p>	<p>30 to 40 workers per sub-project Including Supervisors and E&S focal persons</p>	Construction phase

Primary Supply Workers	Those working in companies/factories that supply primary materials for construction, in particular raw materials	To Be Decided	Construction/purchase of equipment and materials for construction
Community workers	There will be no Community Workers in this project		

3.2. Assessment of Key Potential Labor Risks

Project Activity	Key Labor Risks
General project administration and implementation (hiring of consultants, monitoring and reporting, financial management, audits, E&S management, project coordination)	<ul style="list-style-type: none"> • Presence of foreign workers • Covid-19 transmission risks • SEA/SA risks for staff, in particular women
Design of infrastructure subprojects, including consultation activities and conducting surveys (if needed)	<ul style="list-style-type: none"> • OHS, including traffic related risks • SEA/SH and VAC when designers and/or project consultations close to communities • Presence of foreign workers • Covid-19 transmission risks
Construction works, including procuring materials for the subproject activities and other construction	<ul style="list-style-type: none"> • Operating heavy machinery (OHS) • Traffic hazards (OHS) • Accidents or emergencies (OHS) • Risks of workplace accidents, particularly when operating construction equipment and when handling heavy equipment and materials • Risks from exposure to hazardous substances (dust, cement, chemicals used in construction etc.) • Risks associated with living conditions in site camps, which may include inadequate provision of water and sanitation as well as the risk that construction camps become locations for transmission of sexually transmitted diseases (STD) or expose workers to vector-transmitted diseases such as malaria and dengue and to risk of snakebites and insect stings • SEA/SH and VAC risks for workers and community • Spread of sexually-transmitted diseases • Unequal pay for men and women workers, in particular unskilled workers • Workers hired informally without formal contracts

Project Activity	Key Labor Risks
	<ul style="list-style-type: none"> • Discrimination of women and other vulnerable persons, in particular for unskilled jobs • Pay below the minimum wage, in particular for unskilled jobs • Presence of migrant workers, in particular for unskilled job • Presence of foreign workers, both for skilled and unskilled jobs • Indentured labor in supply chain • Child labor (in supply chain and contracted staff) • Covid-19 transmission risks
Primary Suppliers	<ul style="list-style-type: none"> • Construction material suppliers involve in child labor or forced labor, particularly in the brick industry • Other serious safety issues
Delivering training to communities	<ul style="list-style-type: none"> • SEA/SH and VAC to workers and community • Spread of sexually-transmitted diseases • Covid-19 transmission risks • Road travel to provinces (OHS)
Implementation of TA activities including trainings, meetings, workshops, etc.	<ul style="list-style-type: none"> • Road travel to provinces (OHS) • Sedentary work (OHS) • SH/SEA and VAC when designers and/or project consultations close to communities and/or within staff and/or participants in trainings • Presence of foreign workers • Covid-19 transmission risks

Labor influx:

8. The construction of water and wastewater systems and facilities is expected to bring a limited influx of labor due to the nature of the works. Although contractors will be encouraged to hire workers from within the communities, from the experience of the current WaSSIP project and other projects of similar nature, most workers are likely to come from nearby neighbourhoods, including foreign and local technical consultants and staff. The number of contracted workers usually range between 30 to 40 people at each site, with the potential to require worker camps. Because the labor influx and worker camps will be small to medium size, specific requirements to manage risks associated with labor influx related to interaction between project workers and local communities (such as communicable diseases and GBV/SEA/SH) are expected to be manageable, through contractual requirements, codes of conduct and training set out in this document.
9. Child Labor: The risk of child labor will be mitigated through certification of worker’s age, including of any staff hired directly by the PMUs. This will be done by using the legally recognized document

of the National Identification Card and/or other appropriate documents. The prohibition and negative impacts of child and forced labor will also be included in the training provided to contractors. Contractors will be prohibited from employing anyone under the age of 18. Contractor needs to verify minimum age of workers eligible to be employed for the project. Primary suppliers will be screened regarding the risk of engaging child labor. The consulting supervision firm will need to conduct regular monitoring of health, working conditions, hours of work and the other requirement of ESS2, including verification of the age of workers, and share the report to the PMUs.

10. **Forced Labor:** Forced labor is strictly prohibited for the project. Random inspection by the assigned inspectors/consultants shall be carried out on a regular basis to ensure compliance. Primary suppliers will be screened regarding the risk of forced labor.
11. **Gender-Based Violence (GBV including SEA and SH):** Workers with WASAC will include women as both skilled and unskilled workers as more and more women have been encouraged to be employed in the WB-financed projects. Many workers both men and women will be from neighbouring communities, they will be in workers' camps, separated from their families and acting outside their normal sphere of social control. This can lead to inappropriate and criminal behaviour, such as sexual harassment of women and girls, exploitative sexual relations, and illicit sexual relations with minors from the local community. However, based on the implementation of WaSSIP, such risks can be assessed as "Low", for several reasons: contractors and members of the community are trained on GBV/SEA/SH prior to construction of sub-projects, the number of workers on each site is small and easily supervised, and the project ESO and E&S consultants regularly monitor compliance with the ESSs. Contractors are then responsible for providing the necessary GBV/SEA/SH training to workers, who are required to sign a code of conduct prior to the commencement of works.
12. **Occupational health and safety:** As some workers' camps are anticipated for the sub-projects, there may be risks associated with the living conditions in the camps, including inadequate provision of water and sanitation. With outsiders staying in the local community, there are also risks of transmission of sexually transmitted diseases (STD), exposure of workers to vector-transmitted diseases such as malaria and dengue, snakebites and insect stings, as well as COVID-19 transmission.
13. All workers will be provided with appropriate PPE and will be trained in the required safety procedures and precautions. Appropriate clothing, including hardhats and protective footwear, are required. E&S Safeguards Training including OHS risks will be conducted for the contractor before the civil works start by the E&S officers assisted by E&S consultants. The contractor's key personnel such as E&S staff, site manager, site supervisor will be invited to join the training along with other relevant stakeholders. The OHS risks associated with the sub-projects that need to be considered are:
 - ✓ Accidents may occur with use of heavy machinery
 - ✓ Non-use or improper use of proper PPE can lead to injuries. These include, but are not limited to, wearing gloves, safety boots, hard hats, ear protection, breathing masks, safety glasses, safety harnesses, depending on the work being done, while on duty.
 - ✓ Exposure to wastewater from existing or old sewer lines might affect the health of the workers during sewer installation
 - ✓ Accidents might occur during the excavation works to lay the pipes for both the water supply

and sewerage networks

- ✓ Risks of electrical shocks from careless use of machinery or from contact with electrical wires.
- ✓ Risks associated with working in or near deep waters, such as the water supply intake and the wastewater disposal sites.
- ✓ Risks caused by pollution, lack of hygienic food and drinking water, lack of proper sanitation in the working environment and workers' camps.

14. WASAC will protect the safety of the local communities exposed to project activities and other risks, including STDs, exposure to Covid-19, and other problems that might arise with the influx of workers during the construction phase, through training of contractors and their key staff, required training of workers by the contractors, requirements in the ESMP, C-ESMP or ESCOP for each sub-project, the workers' Code of Conduct, and regular monitoring by the ESOs and E&S consultants.
15. As long as Covid-19 restrictions apply, WASAC will ensure that the contractors follow the World Bank's interim note on "COVID 19 Considerations in Construction/Civil Works Projects" to deal with the pandemic situation.
16. **Unfairly-Paid Workers/ Unpaid Workers:** WASAC will ensure that the contractors or the primary suppliers will treat the workers fairly, providing the same wages for men or women for the same type of work. The workers must have contract agreements and be paid as stated in those agreements, with wages no less than the minimum wage as stated in Cambodia's Labor Law and provided with accident insurance. Workers' rights must be respected.
17. **Civil servants:** The civil servants who are from the government might spend sometimes traveling to the sites for supervision or monitoring, and so could face risks of the road accidents. Measures to avoid traffic accidents include a requirement to travel only during day time, travel only in vehicles that are well maintained including requirement to use seat belts, and the vehicles to be driven by professional/well trained drivers.

3.3. Overview of Labor Legislation

18. The 1997 Labor Law remains the key document governing the regulatory framework for labor in Cambodia.
19. The law establishes a minimum wage level, which may vary among regions. Working hours are limited to 8 hours per day, 6 days a week. There are strong regulatory provisions against discrimination in the workplace, including fair treatment, non-discrimination and equal opportunity, special protection and assistance to vulnerable workers. An entire section of the Law is dedicated to health and safety in the workplace. The Law also covers those who work for subcontractors.
20. Child labor remains a noticeable gap in the legal framework despite many years of participation in related international programs. The Labor Law defines 12 years old as the minimum working age for children, though 12–15-year-olds are meant to engage only in certain light jobs, however this is not always closely monitored. The Prakas on the Prohibition of Hazardous Child Labor (2004) permits hazardous work for well-trained children above 16, with night work from 22.00 PM to 5.00 AM

prohibited. However, for this project, only workers from 18 years of age and above are allowed to work because this work can be hazardous to children under the age of 18. The prohibition and negative impacts of child and forced labor will also be included in the training provided to contractors. The ESMF details the relevant legislation and a gap analysis with the World Bank ESF in Table 2 below.

21. In addition to national legislation and ESS2 on Labor Management, other guidelines that may be adopted are:

- ILO Occupational Safety and Health Convention, 1981 (No. 155)
- ILO Occupational Health Services Convention, 1985 (No. 161)
- ILO Safety and Health in Construction Convention, 1988 (No. 167)
- WHO International Health Regulations, 2005
- WHO Emergency Response Framework, 2017
- WHO Target Product Profiles (TPP) for COVID-19 Vaccines (2020)
- EU OSH Framework Directive (Directive 89/391)

3.4. Overview of Legislation on OHS

22. The Labor Law (1997) includes provisions on Occupational Health and Safety (OHS) mostly consistent with ESS2 and ESS4 of the World Bank's Environmental and Social Framework (ESF). In accordance with the Labor Law, the Ministry of Labor and Vocational Training has issued regulations concerning the OHS as follows:

- Prakas No 052 dated 01 February 2000 concerning sanitary toilets
- Prakas No 054 dated 01 February 2000 concerning the provision of the safe drinking water
- Prakas No 124 dated 15 June 2001 concerning the lifting of heavy objects by hand
- Prakas No 125 dated 15 June 2001 concerning air ventilation and sanitation
- Prakas No 138 dated 22 April 2003 concerning noise at the workplace
- Prakas No 106 dated 28 April 2004 concerning the prohibition of working children in dangerous work places
- Prakas No 075 dated 30 March 2011 concerning sanitation at construction sites
- Prakas No 077 dated 30 March 2011 concerning the provision of information at construction sites
- Prakas No 078 dated 30 March 2011 concerning storage, waste management and cleanliness at construction sites.

Table 2: Gap Analysis between Cambodia Legal Framework and World Bank Requirements of ESS2

Topic	World Bank Requirements	Cambodian Legal Framework	Measures to address gaps
Management of Worker Relationships, and Terms and Conditions of Employment	<ul style="list-style-type: none"> • Labor management procedures applicable to project to be applied. • Workers provided with information and documentation that is clear and understandable. • Paid on a regular basis as required by national law and labor management procedures. • Project workers to receive written notice of termination of employment 	<ul style="list-style-type: none"> • All requirements are contained in Cambodian legislation, except the requirement to develop a written labor management procedure. 	<ul style="list-style-type: none"> • This LMP has been developed to address the gaps. It is to be adapted at sub-project level for each of the participating provinces/municipalities to capture context specific risks as part of the site-specific design and site specific ESMP • If E&S impacts are minor and a site specific ESMP is not used, the requirements will be specified in the Environmental and Social Code of Practice so that all aspects of ESS2 and The Labor Law 1997 are implemented appropriately.
Non- discrimination and Equal Opportunity	<ul style="list-style-type: none"> • Decisions relating to employment or treatment of project workers will not be made based on personal characteristics unrelated to inherent job requirements. • The LMP is to set out measures to prevent and address harassment, intimidation and/or exploitation • Borrowers/Clients to provide appropriate measures of protection and assistance to address the vulnerabilities of project workers. 	<ul style="list-style-type: none"> • All requirements are contained in Cambodian legislation, except the requirement to develop a written labor management procedure. 	<ul style="list-style-type: none"> • This LMP outlines the Project's commitment to non-discrimination and equal opportunity. • The procedure detailing the terms and conditions of employment is to contain provisions relating to non-discrimination and equal opportunity. This will be developed as part of the sub-projects LMP during the ESIA/ESMP preparation. The GRM will also include provisions on how workers and other staff can raise grievances in cases where these non-discrimination measures have not been observed.

Topic	World Bank Requirements	Cambodian Legal Framework	Measures to address gaps
Workers Organizations	<ul style="list-style-type: none"> In countries where national law recognizes workers' right to form and join workers organizations of their choice and to bargain collectively without interference, the project will be implemented in accordance with this law. 	<ul style="list-style-type: none"> The Labor Law (1997) provides that workers are able to form organizations. 	<ul style="list-style-type: none"> The LMP for the sub-projects will detail terms and conditions of employment for direct workers and will reinforce aspects relating to the rights to form and participate within workers organizations.
Child Labor and Minimum Age	<ul style="list-style-type: none"> Minimum age for any employment is 14, with a child between the age of 14 and 18 only able to be employed or engaged in certain circumstances. A child over the minimum age and under the age of 18 will not be employed or engaged in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development. If children below 18 and above the minimum age are employed, an appropriate risk assessment is required prior to the work commencing; and the Borrower conducts regular monitoring of health, working conditions, hours of work and the other requirement of this ESS. 	<ul style="list-style-type: none"> The Labor Law allows for children under the age of 18 to be engaged in the workforce, including: <ul style="list-style-type: none"> Exceptions can be granted to restrictions on hazardous work undertaken by children between the age of 15 and 18. Light work is permitted by children between the ages of 12 and 15 in certain circumstances. Additionally, these restrictions only exist within formal workplace settings, with child labor 	<ul style="list-style-type: none"> The sub-project LMPs are to contain specific provisions relating to the restriction of any child labor within the Project, whether as Direct, Contracted or Primary Supply Workers. Children under 18 will not be allowed to be engaged in the workforce. In addition to age verification measures, IDs or their Family Books should be checked for the real age in case any workers seem to be under 18.

Topic	World Bank Requirements	Cambodian Legal Framework	Measures to address gaps
Forced Labor	<ul style="list-style-type: none"> Forced labor of any kind is expressly prohibited. This includes any kind of the 11 indicators of forced labor described by the ILO. 	<ul style="list-style-type: none"> The Labor Law 1997 and Law on Suppression of Human Trafficking and Sexual Exploitation (2008) prohibit forced labor, the definition of which is generally aligned with ESS2 and the ILO. 	<ul style="list-style-type: none"> The gaps are minimal. To ensure that forms of forced labor commonly observed within the region, particularly retention of documents and salary, do not occur in the sub-projects, LMPs will be included as part of the site specific ESMPs.
Grievance Mechanism	<ul style="list-style-type: none"> A grievance mechanism (GM) is required to be in place for direct and contract workers 	<ul style="list-style-type: none"> There is no specific GRM process for employees working under individual contracts 	<ul style="list-style-type: none"> A grievance response mechanism has been prepared within the LMP and will be updated as part of the sub-projects ESMPs.
Occupational Health and Safety	<ul style="list-style-type: none"> Detailed Procedure required for every project. Requirements to protect workers, train workers, document incidents, emergency preparation, addressing issues; and Monitor OHS performance 	<ul style="list-style-type: none"> No detailed procedure specific to every project. Consistent on requirements to protect workers, train workers, document incidents, have emergency preparedness plan. 	<ul style="list-style-type: none"> OHS provisions included in the LMP, which will need to be utilized and further elaborated at sub-project level for contracted workers and suppliers to develop detailed procedures.
Categorization of Workers (Direct, Contracted)	<ul style="list-style-type: none"> Identifies specific categories of workers and notes the vulnerabilities associated with each that need to be addressed. 	<ul style="list-style-type: none"> The Labor Law and other regulations provides for only limited differentiation of the workforce and how it is tracked by employers and procurement. 	<ul style="list-style-type: none"> The categories used under ESS2 will be applied in this project.

3.5. Responsible Staff

23. Various aspects of the responsibility with respect to worker management will be described in detail in the ESMPs. The PMUs have the overall responsibility to oversee all aspects of the implementation of the LMP, in particular to ensure contractors' compliance. PMUs will address all LMP aspects as part of procurement for works as well as during contractor induction.
24. Contractors will be required to develop, adopt and implement a written Labor Management Plan as part of the bidding document and contract before employing any labor for the project. The contractors are subsequently responsible for management in accordance with their contract specific Labor Management Plan, which is integral to the contractor-ESMPs. Implementation of the LMP will be supervised by the responsible PMU. MISTI/MPWT are responsible for contractor engagement and compliance with contract conditions to address all LMP aspects as part of procurement for works and consultancy/technical assistance activities.

3.6. Policies and Procedures

25. **Equal Opportunity:** Decisions relating to the employment or treatment of project workers will not be made on the basis of personal characteristics unrelated to inherent job requirements. The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.
26. **Occupational, Health and Safety (OHS):** The PMUs will ensure that the Contractors are:
 - Complying with national legislation and other applicable requirements which relate to the OHS hazards.
 - Enabling active participation in OHS risks elimination through promotion of appropriate skills, knowledge and attitudes towards hazards.
 - Continually improving the OHS management system and performance.
 - Communicating this policy statement to all persons working under the control of the implementing agencies, with emphasis on individual OHS responsibilities.
 - Availing this policy statement to all interested parties at all facilities and sites.
27. The Contractor will have a designated Safety, Health and Environmental Representative for the workplace or a section of the workplace for an agreed period. At a minimum, the Representative must:
 - Identify potential hazards;
 - In collaboration with the Contractor, investigate the cause of accidents at the workplace;
 - Inspect the workplace with a view to ascertaining the safety and health of workers provided that the employer is informed about the purpose of the inspection;

- Accompany an inspector whilst that inspector is carrying out the inspector's duties in the workplace;
- Attend meetings of the safety and health committee to which that safety and health representative is a member if any.
- Make recommendations to the Contractor in respect of safety and health matters affecting workers, through a safety and health committee; and
- Where there is no safety and health committee, the safety and health representatives shall make recommendations directly to the Contractor in respect of any safety and health matters affecting the workers.

28. Furthermore, to avoid work related accidents and injuries, the contractor will:

- Provide OHS training to all workers involved in project works.
- Provide PPEs (protective masks, hard hat, overall and safety shoes, safety goggles, etc.), as appropriate.
- Ensure availability of first aid boxes on site.
- Provide workers with access to separate toilets and potable drinking water.
- Ensure provision of voluntary reporting of any COVID-19 or other symptoms and arrange for health emergency services.

29. Further to enforcing the compliance of environmental management, contractors are responsible and liable of safety of site equipment, labors and daily workers attending to the construction site and safety of citizens for each subproject site, as mandatory measures.

30. **GBV/SEA/SH:** Contractors will need to maintain labor relations with local communities through Codes of Conduct (CoC). The CoC commits all persons engaged by the contractor, including sub-contractors and suppliers, to acceptable standards of behavior. The CoC must include sanctions for non-compliance, including non-compliance with specific policies related to GBV/SEA/SH (e.g., termination and recourse to the legal system). The CoC should be written in plain local language and signed by each worker to indicate that they have:

- Received a copy of the CoC as part of their contract
- Had the CoC explained to them as part of the induction process
- Acknowledged that adherence to this CoC is a mandatory condition of employment;
- Understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.

31. A copy of the CoC shall be displayed in a location easily accessible to the community and project-affected people. It shall be provided in Khmer language. Contractors must address the risk of GBV/SEA/SH, through:

32. Mandatory training and awareness-raising for the workforce about refraining from unacceptable conduct toward local community members, specifically women. Training may be repeated

- Informing workers about national laws that make sexual harassment and gender-based violence a punishable offence which is prosecuted
- Adopting a policy to cooperate with law enforcement agencies in investigating complaints about GBV/SEA/SH
- Developing a system to capture gender-based violence, sexual exploitation and workplace sexual harassment-related complaints/issues.

33. **Labor and Working Conditions:** Contractors will comply with the provision of labor conditions including non-discrimination, wages, safer working conditions etc. The PMUs will carry out periodic monitoring to ensure that labor working conditions are met as per national legislation. The awarded contractors will keep records in accordance with specifications set out in this LMP. The PMUs may at any time require records to ensure that labor conditions are met. PMUs will review records against actual conditions at a minimum monthly basis and can require immediate remedial actions if warranted. A summary of issues and remedial actions will be included in quarterly reports to the WB.

34. **Worker Grievances:** A Workers' Grievance Redress Mechanism (GRM) has been detailed with this LMP. Contractors will be required to abide by the provisions of the Workers' GRM. The Environmental and Social Officers/ Consultants will review records on a monthly basis. PMUs will keep abreast of resolutions and reflect in quarterly reports to the World Bank.

35. **Waste Management, Communicable Diseases:** Contractor will be fully responsible to ensure that their workers know and are trained on the national laws, safe disposal of wastes, and reporting of communicable diseases if they contract any. Continuous motivation, monitoring and reporting on the same is the responsibility of the Contractors. The PMUs will have a monitoring team to ensure the same.

36. **Additional Training:** Contractors are required to ensure that the assigned workers are adequately trained and briefed with overall safety arrangement, use of equipment, GRM procedure, working conditions of the project. Training on GBV/SEA/SH and related national laws and preparation and obtaining signed code of conduct are also Contractor's responsibility.

37. **COVID-19 Considerations in Civil and Construction Works:** The contractors will ensure adequate precautions are in place to prevent or minimize an outbreak of COVID-19, and provisions when a worker gets sick. Contractors should develop specific procedures or plans so that adequate precautions are in place to prevent or minimize an outbreak of COVID-19, and it is clear what should be done if a worker gets sick. Details of issues to consider are set out in Section 5 of the World Bank's Interim Note: COVID-19 Considerations in Construction/Civil Works Projects and include:

- Confirming workers are fit for work, to include temperature testing and refusing entry to sick workers
- Considering ways to minimize entry/exit to site or the workplace, and limiting contact between workers and the community/general public
- Training workers on hygiene and other preventative measures, and implementing a

communication strategy for regular updates on COVID-19 related issues and the status of affected workers

- Treatment of workers who are or should be self-isolating and/or are displaying symptoms
- Assessing risks to continuity of supplies of medicine, water, fuel, food and PPE, taking into account international, national and local supply chains
- Reduction, storage and disposal of waste
- Adjustments to work practices, to reduce the number of workers and increase social distancing
- Expanding health facilities on-site compared to usual levels, developing relationships with local health care facilities and organize for the treatment of sick workers
- Establishing a procedure to follow if a worker becomes sick (MOH and WHO guidelines)
- Implementing a communication strategy with the IA in relation to COVID-19 issues on the site.

3.7. Age of Employment

38. The minimum age will be set at 18 years of age. To ensure compliance, all employees will be required to produce National Identification Cards or family books as proof of their identity and age. If any contractor employs a person under the age of 18 years, measures to address the same will be taken by the PMU. The following age verification template will be applied.

Age Verification Template for Project Workers

To be completed for all project workers and attached to contracts

1. Worker's Age: _____

2. Sex of worker: _____

Requested for Proof of Age:

 Y N

3. If NO, provide reason:

4. If YES, type of documentation provided (circle all that apply and attach a copy):

a) National ID Card

b) Family Book

c) Work Permit

d) School report/testimony (from teacher, principal)

e) Other (please describe) _____

5. Is there doubt about the authenticity of documents provided in Q5 or other signs that the worker

is underage (under 18 years) or has provided false documentation?

a. If NO, no further verification is needed.

6. If YES, interviews to verify age will need to be conducted¹. Please describe result of interviews (who it was conducted with, age verification method, etc.).

7. Was age verified in the interview (i.e. worker is at or above age requirements of 18y or above)?

a. If YES, no further steps are needed.

b. If NO, the worker **cannot be hired**.

3.8. Personal Protective Equipment (PPE)

39. Personal Protective Equipment (PPE) provides additional protection to workers exposed to workplace hazards in conjunction with other facility controls and safety systems.

PPE is considered to be a last resort that is above and beyond the other facility controls and provides the worker with an extra level of personal protection. The table below presents general examples of occupational hazards and types of PPE available for different purposes. Recommended measures for use of PPE in the workplace include:

- Active use of PPE if alternative technologies, work plans or procedures cannot eliminate, or sufficiently reduce, a hazard or exposure;
- Identification and provision of appropriate PPE that offers adequate protection to the worker, co-workers, and occasional visitors, without incurring unnecessary inconvenience to the individual;
- Proper maintenance of PPE, including cleaning when dirty and replacement when damaged or worn out. Proper use of PPE should be part of the recurrent training programs for Employees
- Selection of PPE should be based on the hazard and risk ranking described earlier in this section, and selected according to criteria on performance and testing established:

Objective	Workplace Hazards	Suggested PPE
Eye and face protection	Flying particles, molten metal, liquid chemicals, gases or vapors, light radiation.	Safety Glasses with side-shields, protective shades, etc.
Head protection	Falling objects, inadequate height clearance, overhead power cords.	Plastic Helmets with top and side impact protection.
Hearing protection	Noise, ultra-sound.	Hearing protectors (ear plugs or ear muffs).

¹ Interviews should be conducted with parents, child, school official and/or local official.

Objective	Workplace Hazards	Suggested PPE
Foot protection	Falling or rolling objects, pointed objects. Corrosive or hot liquids.	Safety shoes and boots for protection against moving & falling objects, liquids and chemicals.
Hand protection	Hazardous materials, cuts or lacerations, vibrations, extreme temperatures.	Gloves made of rubber or synthetic materials (Neoprene), leather, steel, insulating materials, etc.
Respiratory protection	Dust, fogs, fumes, mists, gases, smokes, vapors.	Facemasks with appropriate filters for dust removal and air purification (chemicals, mists, vapors and gases). Single or multi-gas personal monitors, if available.
	Transmission of Covid-19	As needed, facemasks, hand-washing facilities and/or hand sanitizers
	Oxygen deficiency	Portable or supplied air (fixed lines). On-site rescue equipment.
Body/leg protection	Extreme temperatures, hazardous materials, biological agents, cutting and laceration.	Insulating clothing, body suits aprons etc. of appropriate materials.
Protection from falling from heights	Danger of falling when working at height above 2 meters	Safety harnesses, lanyards, lifelines, non-slip shoes, as needed
Protection from working in or near water	Bacterial/fungal infections of feet, exposed to prolonged dampness. Danger of slipping, falling into water, drowning	Waterproof boots, fall prevention measures such as guardrails, water rescue equipment

3.9. Terms and Conditions

40. The terms and conditions of employment for the Project workers are governed by the provisions of Cambodia's Labor Law.
41. **Conditions of employment and service:** It is mandatory for the employers to provide workers with an Appointment Letter, Identity Card and a Service Book. A register of workers including details of all workers engaged is also mandatory to be maintained by the employer. Leave Procedures are also illustrated. Causes for termination of employment needs to be described for both permanent and temporary workers.
42. **Working hours:** (Article 137), In all establishments of any nature, whether they provide vocational training, or they are of a charitable nature or liberal profession, the number of hours worked by workers of either sex cannot exceed eight hours per day, or 48 hours per week. The extension of the daily working hours cannot exceed one hour. Hours of work cannot exceed ten hours per day.
43. **Wages and calculation of wages:** (Article 104), The wage must be at least equal to the guaranteed minimum wage; that is, it must ensure every worker of a decent standard of living compatible with human dignity. Wages owed to workers shall be paid before payment is made to suppliers of supplies used for construction (Article 121).
44. **Condition of minimum wage rate:** (Article 357), makes it binding on the contractors (employers) to abide by the minimum wages rate. Contractors will also be required to comply with the most current

decision assigned by the government on the minimum wages, hours of work, overtime pay, leave entitlements, travelling and subsistence allowances.

45. **Equal Opportunities for all workers:** All terms and conditions as outlined in ESS2, paragraphs 10 to 15 apply to contracted workers. In addition,

- In line with national law, the maximum working hours are limited to 8 hours per day, 6 days a week.
- Employers shall guarantee that the workers shall have at least one resting day per week. The employers shall also make arrangements for the employees to take vacation according to law during Khmer New Year festival, Pchum Ben Festival and any other holidays prescribed by laws and regulations.
- Employment opportunities will be available to all. This includes equal pay for equal work, regardless whether the person performing the work is male or female.
- The wages paid by the employers to the workers shall not be lower than the local Cambodian minimum wage.
- Provisions of the Labor Law must be followed, including maternity leave for females if applicable.

46. The labor contract shall be provided to workers in writing and shall have the following provisions:

- a) The term of the labor contract
- b) Work content
- c) Labor protection and working conditions
- d) Remuneration for labor
- e) Labor discipline
- f) Conditions for termination of the labor contract
- g) Responsibility for breach of labor contract
- h) Individual Staff's Code of Conduct
- i) Grievance Redress Mechanism.

3.10. Management of contractor's E& S Performance and Commitment

47. The contractor's E&S performance during the construction should be regularly monitored by the consulting firm or PMUs to make sure the ESMP or C-ESMP has been well implemented by the contractor or sub-contractor. To better manage the performance or the commitment of the E&S by the contractor, the following items must be significantly focused on:

- Regular Monitoring
- Making sure that the ESMP or C-ESMP or ESCOPs has been satisfactorily implemented by the contractor
- Recommendation on the improvement of the E&S performance.
- Effective access to and use of GRM.

IV. GRIEVANCE REDRESS MECHANISM (GRM)

48. Workers' grievance redress mechanism (GRM) under the project will support all project workers; direct, contracted, and if applicable, primary supply workers.
49. **Direct Workers:** The Project Directors (WASAC), will be responsible for providing guidance and advice on all worker related grievances and their management, in line with labor law and provisions of this LMP.
50. **Contracted Workers:** The contractor of respective construction packages will be obligated to set up a Workers GRM, specially to redress complaints relating to workers deployed for construction works under WASAC. The Workers GRM will have due representation of respective PIUs and PST, Contractor Workers, and women (either from PIUs/PST/contractor/workers) and function under PIUs. The mandate for GRM, Institutional arrangements, procedure for receiving complaints, time limits for redressal of complaints and escalation level for unresolved cases and resolution thereof will be finalized during the approval of C-ESMP by consultants with assistance from the PMUs. The GRM will be set up at mobilization of the contractor. The contractor will also be responsible for tracking and resolving workers grievances and maintain records about grievances/complaints received, minutes of discussions, recommendations and resolutions made thereof and intimation of resolution of grievance to the complainant.
51. Contractors should consider streamlined procedures to address specific worker grievances, which would allow workers to quickly report labor issues, such as a lack of PPE, lack of proper procedures or unreasonable overtime, and allow the workers to freely report, respond and take necessary action.
52. The Workers' GRM will be well circulated and written in a language understood by all category of workers engaged in the project activities. All workers related grievances will be received through established communication channels and registered with the Workers' GRM at the commune/Sangkat office and Project Support Team (PST) office and Workers will also be able to submit their grievances through the regional and divisional labor offices of the Department of Labor, whose addresses and contact telephone numbers will be prominently displayed by contractors for the visibility of all workers at all worksites.
53. The Workers' GRM will include:
- A channel to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline that might also be anonymous
 - Stipulated timeframes to respond to grievances
 - A register to record and track the timely resolution of grievances
 - A responsible committee to receive, record and track resolution of grievances.
 - The Workers' GRM will be described in workers induction trainings, which will be provided to all category of project workers.

54. The mechanism will be based on the following principles:

- The process will be transparent and allow all category of project 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 through notice boards, the presence of “suggestion/complaint boxes”, and other means as needed.
- The Project Operation Manual (POM) will outline workers’ GRM including institutional set up and representation, timing and procedure for receiving complaints, mechanism of handling complaints, maximum time limits for redressal of complaints and escalation level for unresolved cases and resolution thereof. The PSTs will monitor the Contractors’ recording and resolution of grievances, and report these in their monthly progress reports to share with the PMUs. The process will be monitored by the E&S officers and consultants. The report on workers’ GRM will be disseminated to the workers on a regular basis and shared with the World Bank periodically.

V. ENGAGEMENT AND MANAGEMENT OF CONTRACTORS AND SUB-CONTRACTORS

5.1. Contractors Requirements

55. Any Contractor selected for the Project must be a legitimate and reliable entity and must have their own labor management procedure and practice materially consistent with the requirement of ESS2. The requirement of ESS2 will be incorporated in the bidding documents and contractual agreement and will also include non-compliance remedies. Any subcontractors engaged will also have similar requirements in their agreement including non-compliance remedies.
56. The project requires that contractors monitor, keep records and report on terms and conditions related to labor management. The contractor must provide all category of project workers with evidence of all payments made, including social security benefits, pension contributions or other entitlements regardless of the worker being engaged on a fixed term contract, full-time, part-time or temporarily. The application of this requirement will be proportionate to the activities and to the size of the contract, in a manner acceptable to the clients and the World Bank. An outline of the contractor’s labor management plan to be included in the Contractors ESMP is attached at Annex-1.
57. The contractual agreement will also require inclusion of measures required of Contractors in light of the COVID-19 situation. They will include:
58. Provision of adequate measures for the workers working under COVID-19 situation including free PPEs and sanitization. Provision of workers needing to report COVID-19 symptoms and referral to health facilities and not forcing them to work.
- Provision of medical insurance covering treatment for COVID-19, sick pay for workers who either contract the virus or are required to self-isolate due to close contact with infected workers and payment in the event of death

- Requirement of safe working condition environment, limiting the number of workers
 - Procedures and measures dealing with specific risks. For example, for health care, infection prevention and control (IPC) strategies, health workers exposure risk assessment and management, developing an emergency response plan, per WHO Guidelines.
59. Appointing a COVID-19 focal point with responsibility for monitoring and reporting on COVID- 19 issues and liaising with other relevant parties.

5.2. Contracted Workers

60. The contractors and sub-contractors, who will be primarily engaging the contracted workers at field level and possibly community workers, will be overseen and managed by the PSTs, under the overall guidance of PMUs. At the field level, every contractor will be mandated by contract to deploy at least one EHS officer (Environment, Health and Safety) per construction package to oversee workers' supervisors managing workers on daily basis. The sub-contractor workers will be supervised by their own supervisors and report to EHS Officers of the main contractor.

5.3. Primary Supply Chain Workers

61. The project involves civil works for which construction materials (brick, cement, sand, iron bars, etc.) maybe sourced from primary suppliers. Suppliers of electrical and sanitary equipment, IT and communication equipment that might involve risks of child labor and forced labor, so the risk assessment needs to be assessed appropriately before procuring any supplies from them.
62. In case of construction material suppliers, contractors shall be required to carry out due diligence procedure to identify if there are significant risks that the suppliers are exploiting children or forced labor or exposing worker to serious safety issues. In instances where foreign suppliers are likely to be contracted, the contractor will be required to inquire during the procurement process whether the supplier has been accused or sanctioned for any of these issues and also their corporate requirements related to child labor, forced labor, and safety. If there are any risks related to child and forced labor, and safety identified, the contractor will notify PMU and will address these risks and may avoid such suppliers, where possible.
63. When primary supply workers are engaged, it must be ensured that no child and/or forced labor is involved and OHS requirements for the laborers are followed.

5.4. Civil Servants

64. Government civil servants, who will provide support to the Project, will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement unless there has been an effective legal transfer of their employment or engagement to the project. ESS2 will apply to such government civil servants. Nevertheless, their health and safety needs have to be considered, and the measures adopted by the project for addressing occupational health and safety is- sues,

including those specifically related to COVID-19, will apply to them on the other hand, they might spend sometimes traveling to the sites for supervision or monitoring, so they might face some risks of the road accidents, so they should be well looked after by the PMUs by traveling at day time only with safety vehicles such as project's vehicles and trusted and reliable project's drivers.

5.5. Timing of Labor Requirement

65. The Direct and Contracted Workers will be recruited as soon as the project is approved, especially those forming part of PMU including the PST. The employment of Contractors' workers will be done after award of contract and before the civil and other related works and supply begin. Since the construction will take place at the center of the city where other constructions are taking place, local labors will be abundant in the area with some expected external migrant contracted workers to be assigned at the project sites.

5.6. Information on Contracted Workers

66. The Supervision Consultant will gather and retain information on engagement of contracted workers from the contractor as a reference and documentation. The contractors will be contractually obligated to maintain updated information on all categories of contracted workers, especially the non-local workers and periodically share the same with the PSTs, which in turn will be available with the PMUs through the PSTs. The format for submittal of workers information will be finalized at the mobilization of the contractors. The information database on contracted works to be maintained by the contractors will include but not limited to the following:

- Name and age
- Father's name and permanent address
- Marital status and name of the spouse (if married)
- Number of dependents with relations and gender (as applicable)
- Place of stay of spouse and children during work engagement under the Project
- Address and contact number (in case of an emergency)
- Key skills and years of experience
- Work activities, schedule and duration of engagement as per contract with the contractors
- Duration of contract and rotation arrangements
- Facilities arranged by contractor including health check-ups prior to engagement, accommodation (to be specified by contractor) Pre-employment check-ups, fitness tests and health awareness campaign for workers

ANNEX 1: Outline of Contractor’s LMP as Part of Contractor ESMP

<p>Workforce Management</p>	<ul style="list-style-type: none"> • Profile of workforce – Work activities, schedule, contract duration, workforce rotation plan, workers place of stay, workers with underlying health issues • Measures to mitigate risks on account of COVID 19 • Contingency plan covering – Pre-health check-up, access restrictions, hygiene, waste management, accommodation arrangements, PPE provision and usage • Reporting and handling of Instances of COVID 19 cases, training and communication with workers, training and SOPs on communicating and contact with community
<p>Occupation Health & Safety and Emergency Management</p>	<ul style="list-style-type: none"> • List of work locations, hazards/risks with PPE requirement and numbers • Lists of tasks and work zone critical for hazard prevention • Location of warning signage for hazard prevention • Requirement of first aid boxes and fire extinguishers – task and location wise • Key person(s) to be contacted during emergency • Protocol for deciding the level of emergency – need for hospitalization, information to authorities, etc. • Process of accident analysis, corrective and preventive measures and need for reporting
<p>Addressing GBV/SEA/SH Risks</p>	<ul style="list-style-type: none"> • Preventive measures – provision of lighting, separate toilet areas for men and women, increased vigil and security arrangement for community sensitive GBV/SEA/SH hotspots, if identified. • Sensitizing and awareness of labor on GBV/SEA/SH issues including penalties and legal action against offenders • Awareness about GRM
<p>Workers Code of Conduct</p>	<ul style="list-style-type: none"> • Preparation of Code of Conduct • Making labor aware of conduct with all the provisions, do’s and don’ts, penalties for non-compliances, etc. • Displaying CoC at prominent locations • Signing of CoC by workers
<p>Awareness and Training</p>	<ul style="list-style-type: none"> • Plan for training and awareness covering pollution prevention, OHS, use of PPEs, accident reporting and emergency management, CoC, GBV/SEA/SH, GRM, etc. • Training schedule • Training records
<p>Workers Grievance Mechanism</p>	<ul style="list-style-type: none"> • Details of GRM including contacts • Process of receiving, redressing, escalation, reporting back • Consolidated statement on Grievances (segregated by non-COVID related & COVID related) • Contacts of nearest labor offices of the Department of Labor in the Ministry of Labor and Employment.

ANNEX 2: Sample Code of Conduct for Workers

Individual Code of Conduct

Preventing Gender-Based Violence (GBV) and Violence Against Children (VAC)

I, acknowledge that preventing gender-based violence (GBV) and violence against children (VAC) is important. The company considers that GBV or VAC activities constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. All forms of GBV or VAC are unacceptable be it on the work site, the work site surroundings, or at worker's camps. Prosecution of those who commit GBV or VAC may be pursued if appropriate.

I agree that while working on the project I will:

- Consent to police background check if information available.
- 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—including grooming, or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
- Not engage in sexual favors—for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
- Unless there is the full consent by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non- consensual” within the scope of this Code.
- Attend and actively partake in training courses related to HIV/AIDS, GBV and VAC as requested by my employer.
- Consider reporting through the GRM or to my manager any suspected or actual GBV or VAC by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

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.
- Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography 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 which places them at significant risk of injury.

Use of children's images 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.
- Ensure images are honest representations of the context and the facts.
- 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.
- 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.
- Report to the police if warranted.

I understand that it is my responsibility to avoid actions or behaviors that could be regarded as GBV or VAC or breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV and VAC. 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 ongoing employment.

Signature:

Printed Name: _____

Title:

Date: