Democratic Republic of Timor-Leste

Second Timor-Leste Branch Road Project (P516518)

LABOR MANAGEMENT PROCEDURES (LMP)

DRAFT

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List of Abbreviation

Abbreviation	Definition
CESMP	Contractor's Environmental and Social Management Plan
C-LMP	Contractor's Labor Management Plan
C-OHSP	Contractor's Occupational Health and Safety Plan
DED	Detailed Engineering Design
E&S	Environmental and Social
EHS	Environmental Health and Safety
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESMP	Environmental and Social Management Plan
ESRIT	Environmental and Social Incident Response Toolkit
ESS	Environmental and Social Standard
FGDs	Focus Group Discussions
FM	Financial Management
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
HIV	Human Immunodeficiency Virus
HR	Human Resources
HSE	Health, Safety and Environment
ID	Identification
ILO	International Labor Organization
IUCN	International Union for Conservation of Nature
LMP	Labor Management Procedures
MPW	Ministry of Public Works
MSSI	Ministry of Social Solidarity and Inclusion
OHS	Occupational Health and Safety
PIU	Project Implementation Unit
PMU	Project Management Unit
PNTL	Polícia Nacional de Timor-Leste (National Police of Timor-Leste)
PPE	Personal Protective Equipment
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
SOP	Standard Operating Procedure
STI	Sexually Transmitted Infection
USD	United States Dollar

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1. Introduction

Timor-Leste continues to strengthen its economic and social development while addressing challenges related to poverty reduction, economic diversification, and limited access to infrastructure, particularly in rural and mountainous areas. Improving transport connectivity is important to expand access to markets, services, and economic opportunities for communities. In this context, the Second Timor-Leste Branch Roads Project (TLBRP2), implemented by the Ministry of Public Works (MPW), aims to improve resilient transport connectivity and enhance market access for agricultural producers along selected sections of the Gleno–Maubisse corridor. The Project includes upgrading the Aituto–Hatubuilico Junction Road and the Hatubuilico Junction–Ramelau Sanctuary Road and designing the future Oelue–Fatumea road. These activities will involve number of workers, including consultants, contractors, and various categories of workers engaged in civil work and related project activities.

Effective labor management is essential to ensure that project workers operate under safe, fair, and appropriate working conditions and that labor-related risks are properly identified and managed throughout project implementation. Given the nature of the proposed road works, potential risks may include occupational health and safety (OHS) hazards, labor and employment-related issues, and risks of gender-based violence (GBV), sexual exploitation and abuse and sexual harassment (SEA/SH), and other forms of workplace misconduct.

To address these risks, the Labor Management Procedures (LMP) has been prepared prior to project implementation. The LMP establishes the procedures and requirements for managing labor and working conditions for all Project workers, consistent with applicable Timor-Leste legislation and the World Bank Environmental and Social Framework (ESF), particularly Environmental and Social Standard (ESS) 2 on Labor and Working Conditions. The LMP forms part of the Project's environmental and social management framework and fulfils the relevant commitment under the Environmental and Social Commitment Plan (ESCP).

The LMP applies to all categories of Project workers and sets out requirements related to terms and conditions of employment, non-discrimination and equal opportunity, OHS, prevention of child and forced labor, worker codes of conduct, management of SEA/SH risks, and a worker grievance redress mechanism (GRM). It will guide the Project Management Unit (PMU), construction supervision consultants, contractors, and other parties in managing labor-related risks and promoting safe, respectful, and fair working conditions throughout the Project life cycle.

2. Project Description

Implemented by MPW, TLBRP2 aims to improve resilient transport connectivity and enhance market access for agricultural producers along selected sections of the Gleno–Maubisse corridor. It is expected to make the Gleno–Maubisse corridor more resilient to climate-related damages, such as landslides and floodings so that it can provide year-round access, including during and after extreme weather events. The project is expected to directly benefit an estimated 211,000 people (about 16 percent of Timor-Leste's population) who live in the Ainaro and Ermera municipalities along the project roads. These communities are expected to see shorter, safer, and more reliable journeys, along with a boost to local farming and tourism activity.

This project comprises three components:

- Component 1: Gleno–Maubisse Corridor Upgrading.
  This component aims to improve two road sections so they can better withstand heavy rain and landslides, and to make them safer to travel. Work includes repaving and widening the roads, improving drainage and culverts so water flows away safely, stabilizing slopes to reduce landslide risk (including plants and vegetation), and adding road-safety features. The activities cover:

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- Sub-component 1.1: Aituto–Hatubuilico Junction Road upgrading.
  This subcomponent will upgrade the Aituto–Hatubuilico Junction Road (12 km) of the Gleno–Maubisse corridor to national road standards (6 m carriageway, 2 m shoulders, and 1 m drainage) and will provide for maintenance of the road for three years after the defect liability period. Interventions will include (i) pavement upgrading with selective widening to bring the project road to the national road standards, (ii) culvert and drainage improvement to adapt to the forecasted increases of rainfall volumes and intensities, (iii) slope stabilization structures, including installing bioengineering measures, and (iv) road safety improvements.

- Sub-component 1.2: Hatubuilico Junction–Ramelau Sanctuary Road upgrading. This subcomponent will upgrade the Hatubuilico Junction–Ramelau Sanctuary Road (5.4 km) of the Gleno–Maubisse corridor to municipal roads standards (5 m carriageway, 2 m shoulders, and 1 m drainage) and will provide for maintenance of the road for three years after the defect liability period. Interventions will include (i) pavement upgrading with selective widening to bring the project road to the municipal road standards, (ii) culvert and drainage improvement to adapt to the forecasted increases of rainfall volumes and intensities, (iii) slope stabilization structures, including installing bioengineering measures, and (iv) road safety improvements.

- Component 2: Institutional Strengthening. This component will finance assessment, detailed designs, bidding documents, and E&S instruments required for the preparation of potential future investments in the road sector, including those for the Oeleu–Fatumea road (54 km). The component would also finance activities to strengthen MPW's capacity in road asset management and maintenance.

- Component 3: Project Management Support. This component will support effective project coordination, procurement, financial management, E&S risk management, contract management, monitoring and evaluation, and stakeholder engagement. Although fully financed by the Government, the component is included to reflect the project's full scope and provide a complete account of the institutional resources required for effective implementation.

The project is located in western Timor-Leste, along the Gleno–Maubisse road corridor, covering the Ainaro and Ermera municipalities. This corridor links to other major roads connecting Dili to Ainaro and Gleno to Tibar and provides access to some of the country's main coffee-growing areas and to Mount Ramelau, a popular tourist destination. Because the area is mountainous, it is especially prone to landslides, erosion, and flooding, which is why building in more climate resilience is a priority.

3. Overview of Labor Use on The Project

Based on the project's scale, combined works, and previous road projects in Timor-Leste, the workforce will include a mix of locally recruited skilled, semi-skilled, and unskilled labor, alongside non-local skilled tradespeople and supervisory or technical staff mobilized by the PMU, Construction Supervision Consultant, and Contractor. The expected workforce categories encompass PMU staff and consultants, construction supervision consultants, contractors, subcontractors, and suppliers. Most unskilled and semi-skilled workers are expected to be recruited locally from the Ainaro and Ermera municipalities and adjoining Branch Road sections, with this local recruitment coordinated through Suco Chiefs and PMU to ensure equitable community access, while specialized skilled workers may be sourced nationally or internationally.

Given community expectations for employment opportunities, contractors will be encouraged to prioritize local labor, provided that minimum qualifications and skills requirements are met. Where local skills are insufficient, the Contractor may, in exceptional cases, mobilize non-local or foreign labor for specialized tasks, subject to a comprehensive labor-influx risk screening. Additionally, women will be actively encouraged to fill suitable roles under non-discriminatory recruitment criteria and the principle of equal pay for equal work. The Contractor will confirm exact labor numbers once appointed and formally update this LMP prior to mobilization.

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3.1 Categories of Project Workers

The Project will involve three main categories of workers in accordance with ESS2:

- **Direct Workers:** Individuals employed directly by MPW for project management, coordination, and supervision. Direct workers will primarily consist of national staff, with some international consultants engaged in specialized roles.
- **Contracted Workers:** Workers engaged through third parties, including contractors, subcontractors, and the Construction Supervision Consultant, primarily for civil works and technical supervision. Contracted workers will constitute the largest workforce group and will include construction workers, technicians, and supervision personnel.
- **Primary Supply Workers:** Workers employed by suppliers providing materials and equipment essential to the Project.

Table 1. Project Worker Categories and Roles

Category	**Types of Workers**	**Expected Roles**	**Estimated number of workers/ firms**
Direct workers	• PMU staff • Technical specialists (engineers, Environmental and Social (E&S), Financial Management (FM), etc.) • Consultants (e.g., DED consultants)	Project management, technical oversight, coordination, reporting, supervision of contractors	70 workers
Contracted Workers	• Skilled workers (engineers, technicians) • Semi-skilled and unskilled construction workers • Construction Supervision Consultant staff	Execution of civil works (excavation, pipe laying, structures, electrical works); site supervision; contractor compliance and quality control	70 workers
Primary Supply Workers	Workers involved in production and supply of materials such as cement, steel, aggregates, pipes, equipment, etc.	Supply essential materials and equipment for construction work	40 workers

3.2 Timing of Labor Requirements

The timing and composition of labor will vary depending on project phases:

- Design and preparation phase: engagement of technical experts and consultants;
- Construction phase: peak labor demand, including skilled, semi-skilled, and unskilled workers;
- Operation phase: limited labor, mainly for operation and maintenance by PMU.

Skilled workers are likely to be engaged over longer periods, while unskilled workers will be engaged on a task-based or short-term basis depending on construction activities.

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4. Assessment of Key Potential Labor Risks

4.1 Project Activities Relevant to Labor

The Project involves a combination of infrastructure development and implementation support activities, requiring different types of labor across its lifecycle. Components 1 is expected to be the most labor-intensive and risk-prone, including extensive civil works to develop and upgrade the road along 12 km of the Aituto-Hatubuilico Junction Road and 5.4 km of road along the Hatubuilico Junction-Ramelau Sanctuary Road. Component 2 will focus more on preparing engineering designs and E&S studies to prepare possible future road projects, potentially for the Oeleu–Fatumea Road.

The activities for Components 1 mainly include rehabilitation of existing roads to be national and municipality roads. The work will involve excavation, trenching, handling construction materials, operating machinery, and working in active peri-urban and rural environments. These conditions create a range of OHS risks as well as interaction risks between workers and nearby communities. Labor-intensive activities expected to drive the principal labor and OHS exposure include site clearance and earthworks; cutting and benching of slopes in landslide-prone sections; drainage and structure construction; operation of heavy plant and vehicles on a narrow, winding corridor shared with pedestrians and local traffic; handling and storage of hazardous materials; and quarrying, crushing, batching and asphalt-mixing at material-supply sites. The work will mobilize a mixed workforce of locally recruited unskilled/semi-skilled labor from neighboring suco, together with non-local skilled tradespeople, supervisory staff and, for specialized tasks, possible foreign technical personnel, over an estimated multi-month construction period.

Component 2 mainly supports road design preparation. While these activities involve fewer physical risks compared to construction, they still include field-based work, travel, and interaction with community members, which may expose workers to safety and security risks, particularly in unfamiliar or remote locations.

4.2 Key Labor Risks

The nature of the project activities, the scale of civil works, geographic location, and the potential interaction of the workforce point to several labor and working-condition risks.

Physical risk is concentrated in earthworks and plant operation on steep, landslide-prone terrain, where a landslide, fall, or struck-by incident could cause serious injury or death, compounded by the rainy season. The predominantly informal, casual and day-rate nature of much of the expected local labor creates a real risk that workers are engaged without documented terms, without social-security registration, and therefore without access to occupational-accident compensation if injured. Mobilization of non-local labor into a small rural corridor carries labor-influx risks, including pressure on local services, potential community-worker tension over recruitment, and elevated risk of GBV and SEA/SH given the documented high regional GBV prevalence and the limited local presence of specialized referral services. Lower national minimum age for hazardous work (17 years old), and the increase in local cash income and informal economic activity around work sites raise a secondary risk of child labor or school disruption in the corridor communities. Quarrying, crashing, and batching operations carry occupational-health risks (dust, noise) for both direct and primary-supply workers, as well as community members living nearby. Finally, limited local Contractor experience with ESS2-compliant labor management, together with the project's rural and multi-site nature, increases the risk of inconsistent implementation of labor supervision, monitoring and grievance-handling arrangements across the road corridor, requiring adequate resources and active PMU oversight. Table 2 below describes the detailed risks and mitigation measures.

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Table 2. Labor and Working Condition Risks and Mitigation Measures

Risks	Mitigation Measures
Employment and Supervision	
Non-transparent or unfair recruitment practices leading to worker grievances or community tensions	Ensure transparent recruitment procedures and public communication of job opportunities. Implement non-discrimination and equal opportunity policies consistent with ESS2.
Exclusion of vulnerable groups from employment opportunities	Apply non-discrimination principles. Promote inclusive hiring practices. Monitor participation of vulnerable groups.
Informal employment and lack of documented terms	Provide written contracts with clear terms and conditions.
Risk of child labor and hazardous work involving underage workers	Prohibition of child labor by setting minimum working age at 18 years old. Verification of worker age through official identification. Inclusion of age requirements in contracts and bidding documents.
Limited contractor capacity to enforce labor and safety requirements	Include LMP requirements in bidding documents and contracts. Regular supervision by PMU and Supervision Consultants. Capacity building and training for contractors on ESF and ESS 2.
Inconsistent labor supervision across a multi-site, rural corridor	Site inspections and labor and working conditions record review. Periodic Contractor / labor reporting on LMP implementation to PMU. Capacity-building/training for Contractor and monitoring staff.
Worker grievances underreported due to power imbalance or fear of retaliation	Accessible, confidential worker grievance channel distinct from the community GRM; explicit non-retaliation commitment in inductions/contracts.
OHS	
Construction-related accidents (Landslide, fall and struck-by hazards during earthworks/ slope-cutting, trenching, machinery, electrical works, etc.)	Implementation of OHS plans in line with ESMP and CESMP. Mandatory Personal Protective Equipment (PPE) provision and enforcement. Job Safety Analysis and toolbox meetings. Appointment of qualified OHS supervisors.
Exposure to dust, noise, vibration, and hazardous materials	Implementation of OHS plans in line with ESMP and CESMP. Mandatory PPE provision and enforcement. Monitoring exposure levels. Training in safe handling of materials. Health surveillance for exposed workers.
Traffic accidents due to construction vehicles and equipment	Traffic management plans. Signage and barriers. Community awareness and coordination.
Occupational accident / insurance coverage gap for casual and day-rate workers	Contractor required to register and contribute to Social Security's occupational-accident branch for all workers, including casual/day-rate labor.
Labor Influx	
Labor influx (limited but present), including non-local workers, leading to social tensions or perceived inequity	Prioritize recruitment of local workers where feasible. Transparent communication on recruitment criteria. Engagement with local leaders.
Increased risk of communicable diseases due to worker movement and interaction	Health awareness and hygiene training. Access to basic medical services and first aid. Compliance with national public health guidance.
Increased pressure on local services and infrastructure	Provision of worker facilities (water, sanitation, accommodation where applicable). Proper workforce planning to minimize local disruption.
GBV and SEA/SH	
SEA/SH due to worker-community interaction	Mandatory Code of Conduct for all workers, including SEA/SH provisions. SEA/SH awareness training for workers and communities.

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	Enforcement of sanctions for violations. Establish confidential and survivor-centered grievance mechanism.
Inappropriate worker behavior (violence, substance abuse, harassment, exploitation)	Worker Code of Conduct implementation and monitoring. Regular supervision and disciplinary measures. Community awareness and grievance mechanisms.
Health and safety risks for female workers, including workplace harassment	Provide gender-sensitive facilities (separate sanitation, lighting, safety). Ensure safe working conditions and transport arrangements. Promote gender-sensitive workplace policies.
Worker–Community Interaction	
Conflicts between workers and local communities	Ongoing stakeholder engagement (aligned with SEP). Communication through local leaders. Accessible grievance mechanism.
Safety risks to community from construction activities	Site fencing and controlled access. Safety signage. Advance notification of high-risk activities. Work scheduling to avoid community traffic (e.g., seasonal pilgrimage periods, etc.).
Working Conditions and Welfare	
Poor working conditions (poor sanitation, fire safety, rest areas)	Provision of adequate worker facilities (sanitation, water, shelter). Fire safety and marked egress. Compliance with World Bank Environmental, Health and Safety (EHS) Guidelines.
Poor hygiene practices leading to health risks	Provision and maintenance of sanitation facilities. Hygiene awareness training and regular inspection. Monitoring of catering services (if applicable).
Risks related to worker accommodation (if camps are used)	Compliance with the guidelines on worker accommodation in ESMP and CESMP. Separate facilities for men and women. Safe, secure, and hygienic living condition.
Primary Supply Chain	
Use of child labor, forced labor, or unsafe practices in supply chains	Screen primary suppliers. Include LMP in procurement contracts. Monitor high-risk supply chains.
Field Work	
Risks during field visits (travel accidents, security, community interaction)	Safe travel protocols (limit night travel, safe vehicles). Pre-assessment of field conditions. Emergency contact procedures.

Risks and mitigation measures in Table 2 will be updated throughout project implementation as the project design evolves.

5. Brief Overview of Labor Legislation

5.1 ILO Convention and National Legislation

Timor-Leste has ratified six of the ten ILO core conventions[1]: the Forced Labor Convention (No. 29) and the Freedom of Association and Protection of the Right to Organize Convention (No. 87), the Right to Organize and Collective Bargaining Convention (No. 98), and the Worst Forms of Child Labor Convention (No. 182), all ratified in 2009; and the Equal Remuneration Convention (No. 100) and the Discrimination (Employment and Occupation) Convention (No. 111), both ratified in 2016. Four core conventions remain unratified[2]: the Minimum Age Convention (No. 138), the Abolition of Forced Labor

[1] https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11200::::::

[2] https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11210:0::NO:11210:P11210_COUNTRY_ID:103251

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Convention (No. 105), the Occupational Safety and Health Convention (No. 155), and the Promotional Framework for Occupational Safety and Health Convention (No.187).

At national level, labor and working conditions in Timor-Leste are governed primarily by the Labor Law (Law No. 4/2012), which sets out the core framework for employment contracts, working hours, wages, termination, non-discrimination and OHS. This is complemented by the Social Security Law (Law No. 12/2016) establishing the national contributory social protection system; Presidential Decree No. 01/2012 setting the national minimum wage; Safety, Health, and Hygiene at the Workplace Law to ensure OHS practice (Law No.11/ 2023); the Immigration and Asylum Act governing foreign workers' visas and work permits; and the Penal Code, which criminalizes forced labor, trafficking and sexual violence. Labor Law obligations are enforced by the Labor Inspectorate (strengthened under Decree-Law No. 19/2010 and subsequent amendments) and the Labor Courts for disputes that cannot be resolved administratively.

Work agreements. The Labor Law recognizes two principal contract types: indefinite-term contracts (no fixed end date, the default form of employment) and fixed-term contracts (for specific projects, temporary needs or seasonal work, generally capped at two years and limited in the number of permissible renewals, after which the relationship may be reclassified as indefinite). Contracts must be in writing in one of the official languages and specify, at minimum, the identity of the parties, job title and duties, workplace location, contract type and duration, working hours and remuneration.

Termination of employment. Dismissal requires fair, just cause, and adherence to defined procedures; recognized grounds include obsolescence or expiry of a fixed-term contract, mutual agreement, termination on the employee's initiative, termination by the employer's initiative on the basis of just cause, and market, technological or structural reasons. Minimum notice periods scale with length of service. Termination without just cause can result in reinstatement or compensation, and employees may challenge a dismissal through the Labor Courts.

No Discrimination and Equal Opportunity. The Constitution guarantees equality before the law, and the Labor Law prohibits discrimination in recruitment, treatment and terms of employment, including on the basis of sex, and requires equal pay for equal work. Article 6 of Labor Law regulates all workers (men and women) to have the right to equal opportunities and treatment in access to employment, vocational training, and professional development, working conditions and remuneration. This includes requirements on non-discriminatory behavior during work application, arrangements for disadvantaged workers, equal arrangements on salary/ benefit and grievances. Labor Law also includes arrangements on Workers with Disabilities, applicable to worker/job applicants who have a disability or chronic illness, covering requirements on medical test exclusion, confidentiality arrangements, safety precautions in the workplace and suitability of the type of work and working hours.

Prohibition of Forced Labor. Labor Law defines the scope of forced labor or compulsory labor as all work or service which is exacted by any person under menace or coercion, and which has not been offered voluntarily in such cases as:

- Way of repaying an actually incurred or inherited debt;
- Means of political coercion or as punishment for expressing certain political or ideological views;
- Method of mobilizing and utilizing labor for economic development purposes;
- Measure of racial, social, national, or religious discrimination.

Minimum wages. Presidential Decree No. 01/2012 sets the national minimum wage, which applies to all workers regardless of nationality. Wages are paid in United States Dollar (USD).

Working hours. Standard working hours are 8 hours per day and 44 hours per week, with overtime compensated at a premium rate above the normal hourly rate. Workers are entitled to a weekly rest day, at least 12 days of paid annual leave, public holidays, and paid maternity leave of 12 weeks.

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Age of employment. The Labor Law sets the general minimum age for employment for light work at 15 years and prohibits children from doing hazardous work. However, the definition of child in the Law is 17 years old, which is below the ESS2 standard of age 18 for hazardous work. A national List of Hazardous and Prohibited Activities to Children Under 18 has been adopted, though its interaction with the Labor Code's age-17 threshold is not entirely clear. This LMP applies to the stricter age-18 standard directly, given that road construction is inherently hazardous work.

OHS. Labor Law establishes general employer duties to provide a safe and healthy working environment, prevent occupational accidents and disease, and ensure worker training and information on workplace hazards, and the Labor Inspectorate enforces them. Furthermore, Law No. 11/2023 on Safety, Health and Hygiene at Work sets rigorous OHS requirements by requiring employers to ensure dignified, safe, and hygienic conditions across all aspects of work. The law requires risks to be identified and managed at their source and explicitly prioritizes collective protection measures over individual protection. It enforces a strict employer obligation to provide appropriate PPE to all workers free of charge, maintain regular health surveillance, and deliver information in a language workers understand. This law also gives workers the explicit right to stop work or evacuate a danger zone immediately in the event of serious and imminent danger. To ensure workplace compliance, the law mandates that companies with more than 20 workers, or those engaged in high-risk activities, establish a joint employer-worker Joint Commission to continuously monitor, report, and mitigate occupational hazards.

Violence and SEA/SH Prevention**.** Labor Law explicitly prohibits harassment and defines sexual harassment as any unwelcome behavior of a sexual nature (verbal, non-verbal, or physical) that impacts a worker's dignity or creates a hostile, offensive, or intimidating environment. It requires employers to put in place all necessary measures to prevent harassment, especially sexual harassment, in the workplace.

Social protection/security. The Social Security Law (Law No. 12/2016) established a mandatory Contributory Social Security System covering old-age pensions, sickness, maternity, unemployment and occupational accidents. Under the mandatory general scheme, employers contribute 6% and employees 4% of gross salary, applicable to all formal employees (public and private). Since December 2022, a voluntary scheme has been available to individual business owners, informal-sector workers, and other workers not automatically covered by the mandatory scheme.

5. 2 Summary of Labor Legislation and Gaps with ESS 2

Labor management for this Project is governed by the national laws of Timor-Leste alongside the World Bank's ESS2: Labor and Working Conditions. ESS2 promotes sound worker-management relationships and enhances the development of benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. Key objectives of the ESS2 are to promote safety and health at work; promote the fair treatment, non-discrimination, and equal opportunity of project workers; protect project workers, including vulnerable workers such as women, persons with disabilities, young people, migrant workers, contracted works, community workers, and primary supply workers, as appropriate; prevent the use of all forms of forced labor and child labor; support the principle of freedom of association and collective bargaining of project workers in a manner consistent with national law; and provide project workers with accessible means to raise workplace concerns.

While Timor-Leste's national legislation covers fundamental labor rights, several key gaps exist between national laws and World Bank ESS2 requirements. These gaps, as outlined below, will be addressed through this LMP (see Section 7. Policies and Procedures, Section 8. Age of Employment, Section 9. Terms and Condition, Section 10. GRM) and throughout project implementation. Table 3 sumarrizes the labor legislation and gaps with ESS2

Tabel 3. Summary of Labor Legislation and Gaps with ESS 2

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Labor Aspect	National Legislation	ESS 2 Requirements	Gap Identified
Minimum Age for Hazardous Work	Labor Law sets the minimum age of a child at 17 years old. Law No. 11/2023 reinforces special protections for underage workers but defers to hazardous classifications.	No child labor, minimum age at 18 years old for all forms of hazardous, civil, or high-risk construction work.	National hazardous-work minimum age (17) is below the ESS2/ILO standard (18). Road construction is inherently hazardous work.
Contract Documentation	Labor Law 4/2012 mainly requires written contracts but also recognizes non-written agreements, which can lead to undocumented conditions.	Requires all workers to receive clear, written documentation regarding terms of employment (hours, wages, leaves, benefits).	Potential risks of casual/day-rate laborers common on road works are engaged without documented terms (as common in practice).
Worker GRM	Law No. 11/2023 allows workers to lodge complaints regarding working conditions directly to government labor inspectors. Labor Inspectorate handles complaints and Labor Courts hear disputes, both are state-level, generalized mechanisms	Project-level grievance mechanism accessible to all workers for workplace concerns, in addition to any formal legal recourse.	No national legal requirement for a project- or site-level internal grievance mechanism; workers otherwise depend on a formal, potentially slow state process for even minor workplace concerns.
OHS Oversight	Law No. 11/2023 sets rigorous OHS requirements, including employer obligation to provide free appropriate PPE to all workers, maintain regular health surveillance, and deliver information in a language workers understand. The law mandates that companies with more than 20 workers establish a joint employer-worker Joint Commission to monitor, report, and mitigate occupational hazards.	Mandates comprehensive, site-specific OHS plans, free PPE distribution, and proactive community-workforce safety zoning with specific detail based on World Bank Environmental, Social, Health and Safety (ESHS) Guidelines.	General legal framework is quite comprehensive but lacks the granular, site- and hazard-specific details of the World Bank ESHS Guidelines (e.g., contractor-level OHS plans, PPE specification, incident-reporting timelines, emergency protocols). The OHS requirement needs to be fully implemented alongside the project's specific Contractor OHS Management Plan under PMU supervision.
Insurance & Work-Injury / Accident Compensation	Law No. 12/2016 covers pensions, sickness, maternity, unemployment and occupational accidents. Mandatory general scheme: employer contributes 6%, employee 4% of salary, for all formal employees and individual business owners. A voluntary scheme exists for informal sector/ other	Workers to have access to a system of compensation for work-related injury, illness, disability or death – via national social security/insurance where adequate, or employer-arranged coverage where national coverage is limited or does	Casual/ short-term/ day-rate construction laborers are only covered if the Contractor formally registers and contributes for them under the mandatory scheme; if engaged informally without registration, they fall back on the voluntary scheme, which is not automatic and leaves a real coverage risk

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	workers not covered by the mandatory scheme.	not reach certain worker categories.	for work-related accidents unless actively enrolled.
Workplace GBV and SEA/SH	Penal Code criminalizes sexual violence and abuse; Ministry of Social Solidarity and Inclusion (MSSI) coordinates a referral network with police and civil society. Code of Conduct Prohibiting SEA/SH is available for public servants.	Code of Conduct prohibiting SEA/ SH among workers and community members; confidential reporting channel; disciplinary consequences.	Criminal-law protection is strong, but no workplace-specific (employer-level) sexual-harassment policy requirement and code of conduct exists in the Labor Law.
Primary Supply Chain Management	National laws do not explicitly extend the main contractor's legal liability to the working conditions of third-party supplier facilities.	Mandates monitoring of primary suppliers to prevent risks of child labor, forced labor, or severe OHS breaches.	No national equivalent; relies entirely on project/contract-level requirements.

6. Responsible Unit

To ensure consistent implementation of labor risk management across the multiple worksites along the road corridor, institutional responsibilities for implementing LMP as an integral part of the Project's overall E&S Management arrangement are defined as follows:

6.1 PMU - MPW

- PMU in the MPW. Contact Information: Amilcar Victor, Project Manager.
  Responsibility:
  - Overall Oversight. Holds ultimate responsibility for the implementation of the LMP and ensures compliance with the ESCP.
  - Auditing and Reporting. Supervise regular audits of contractor labor management practices, review OHS incident reports and notify the World Bank within 24 to 48 hours of any severe or fatal workplace accidents.
  - Escalated grievance management. Monitors the performance of the workplace GRM and resolves escalated labor disputes that cannot be settled at the site level.
- E&S Specialists. Responsibility:
  - Oversee the implementation of LMP, including GRM, by conducting periodic reviews of the Project LMP implementation and ensuring that compliance with applicable national regulations and ESF is met by the Project.
  - Oversee the implementation of annual induction of LMP and GRM for staff at the national and Project office and for workers at project sites.
  - Responsible for reviewing and providing input to the compiled periodic implementation report of LMP and project workers' GRM as part of the overall Project progress report.
  - Review and approve the work plan and organizational arrangement set by the Construction Supervision Consultant that also covers arrangement for LMP and GRM implementation at the project sites

6.2 Construction Supervision Consultant

The Construction Supervision Consultant will be obliged to manage the ES management system (including LMP) implementation by the Contractor/ Primary Supplier in all Project sites.

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Ensuring compliance with the applicable E&S risk management procedures as well as compliance with the applicable national regulations and World Bank's ESF. Responsibility:

- Acts as the PMU's field representative to monitor day-to-day contractor compliance with LMP, OHS, and labor standards across all active worksites.
- Age and Contract Verification. Audits the contractor's onboarding registry to verify worker identifications (IDs), age records, and signed employment contracts before personnel are allowed on-site.
- Involve in the development of the bidding document for contractor selection, ensuring that the requirements of the E&S risk management (including requirements in LMP, GBV protocol and OHS) for the Contractor are included.
- Produce regular reports for the E&S Specialists by submitting a monthly implementation report of the E&S risk management (including LMP).
- Develop LMP work plan and organizational arrangement, as necessary (e.g. in GRM and/or emergency response organization).
- Review and provide input to the periodic LMP implementation report submitted by the Contractor/Primary Supplier.
- Conduct routine site inspections to check on the actual implementation of LMP, GBV protocol, and OHS by the Contractor/Primary Supplier in the Project sites.
- Assist the E&S Specialists in monitoring the implementation of GRM at the project sites.
- Retains the contractual authority to issue immediate stop-work orders if critical OHS hazards that threaten worker safety or indications of child labor are identified.

6.3 Contractor and Primary Supplier

Once selected, the contractor and Primary Supplier are responsible for the day-to-day implementation and monitoring of the E&S risk management (as agreed in the Contract) for their workers, subcontractor workers, and other third-party workers under their authority, including implementing and monitoring this LMP and GRM. Responsibility:

- Develop and implement a site-specific CESMP that covers the Contractor's LMP (C-LMP), Contractor's OHS Plan (C-OHSP), GRM, and other relevant Standard Operating Procedure (SOPs) for mitigating E&S risks and impacts and addressing occupational and community health and safety-related risks and impacts during construction, to be approved by the Construction Supervision Consultant and PMU prior to physical mobilization.
- Appoint a qualified Health, Safety and Environment (HSE) Manager (or HSE Officer for smaller contracts) responsible for day to day OHS management supported by E&S Focal Points.
- Ensure local recruitment processes are fair, open, and formally coordinated through the Suco Chiefs, while strictly enforcing non-discriminatory, equal-pay-for-equal-work criteria.
- Provide standard PPE to all workers free of charge, maintain separate hygienic sanitation facilities for men and women, and install physical Worker GRM complaint channels.
- Enforces the mandatory signing and strict implementation of the worker Code of Conduct , including zero-tolerance sanctions for SEA/SH and gender-based misconduct among all staff and logistical drivers.
- The Contractor and Primary Supplier will provide periodic reports (daily and emergency) to the E&S Specialists through the Construction Supervision Consultant.

7. Policies and Procedures

This section summarizes main policies and procedures to be followed throughout project implementation in compliance with national regulations and ESS2 requirements.

Non-discrimination and equal opportunity

Non-discrimination and equal opportunity in recruitment, terms of employment and treatment at work, regardless of sex, ethnicity, disability, or other status, equal pay for work of equal value. Decisions relating to the employment or treatment of project workers will not be made based on 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

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respect to any aspects of the employment relationship, such as recruitment and hiring, compensation, working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement or disciplinary practices.

The project will identify and provide measures that support equal opportunities for women and men, including measures to prevent harassment of project workers, including sexual harassment. Relevant measures that address working conditions, accessibility of the built environment, and communication of information for project workers with disabilities, shall also be identified as relevant to ensure accessibility and equality of opportunities for all project workers.

Forced Labor

No use of forced, bonded or trafficked labor by the contractor, subcontractors or primary suppliers; contracts to include an explicit prohibition clause. All project workers involved in this project are prohibited to engage forced labor, which includes the practice of the following:

a. bonded /indentured labor (working against an impossible debt),
b. excessive limitations of freedom of movement,
c. excessive notice periods,
d. retaining the worker's identity or other government-issued documents or personal belonging,
e. imposition of recruitment or employment fees payable at the commencement of employment,
f. loss or delay of wages that impede the workers' right to end employment within their legal rights,
g. substantial or inappropriate fine,
h. physical punishment,
i. use of security or other personnel to force or extract work from project workers, or other restrictions that compel a project worker to work on a non-voluntary basis.

OHS

In line with national labor laws and ESS 2, the employer and all project workers must follow OHS standards. The project will include in the bidding documents specific OHS standard requirements that all contractors will comply with that is consistent with the local regulations and the World Bank ESF. The contractor will need to develop OHS Management Procedure that comprises identification and assessment, prevention and mitigation, monitoring, reporting and continual improvement procedures for OHS risks.

This project is committed to ensuring OHS for all project workers by:

- Complying with applicable laws and regulations related to OHS.
- Maintaining healthy and safe working conditions as required by legislation and requirements of ESS 2, such as safe working conditions, safety of project travel, prevention of SEA/SH.
- Applying hazard identification and control measures and implementing OHS plans in line with ESMP and CESMP.
- Provision and Use of PPE, welfare facilities, training, and incident reporting.
    - PPE: Workers must wear a proper PPE. The PPE must be checked and should be in good condition to ensure job safety. PPE may include but not limited to: Hard hats, high-visibility vests, safety boots, gloves; respirators and ear protection at plant/crushing sites; sized and fitted for all workers. Issued free of charge; replaced when worn; use enforced through site induction and supervision.
    - First aid & medical: At least one trained first aider per work crew; first-aid kit at each active work front and camp; arrangement with nearest health post/hospital for emergency referral; ambulance/transport arrangement for serious injury. Contact numbers included in CESMP and displayed at site office.
    - Sanitation & welfare facilities: potable water, toilets (separate for women where mixed crews are present), handwashing facilities, rest/shelter area at each active work front. Aligned with WB ESHS Guidelines.
    - OHS training: mandatory site induction for all workers before starting work; toolbox talks at least weekly; specific training for high-risk tasks (excavation, plant operation, hazardous materials handling). Attendance records kept; refresher training where incidents occur.

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    - Incident recording & reporting: all incidents/near-misses logged; lost-time injuries and fatalities reported to PMU within 24 - 48 hours; monthly OHS statistics in Contractor Progress Report feeds into ESMP social monitoring indicators and World Bank incident-reporting obligations.
- Applying mitigation measures for occupational health
    - Pre-deployment basic health check for workers, where feasible.
    - Access to a health post or on-call medical provider for work-related illness/injury; referral pathway to municipal health services for serious cases.
    - Communicable disease awareness (including HIV/STI) as part of worker induction, coordinated with the GBV/SEA/SH Action Plan messaging.
    - Noise and dust exposure monitoring at quarry/crushing/batching sites, with health surveillance for regularly exposed workers.
    - Heat-stress management (hydration, rest breaks, adjusted schedules) during high-temperature periods.
- Applying safety measures for travel, including to the challenged areas:
    - Research and coordination with local authorities and other related parties to understand the current condition and safety status in the target areas.
    - Develop work plans and scheduling, including selection of teams with the required specifications, identify necessary mobile equipment, communication appliances and safety precautions, including identify transportation, accommodation and activity venues that are according to safety standards.
    - Planning and coordination with all relevant parties beforehand via online meetings and involve consultations with local authorities from the beginning to the end of the mission.
    - Share travel itinerary with other project personnel. Provide daily “check-ins” to the project office/colleagues when deemed necessary.
    - Carry personal emergency contact numbers and identify and take notes of the local emergency medical services and contact numbers at site.
    - Pack a basic first-aid kit, including any personal prescribed and/or non-prescribed medications.
    - Avoid traveling at night unless there is no other feasible option.
    - Prioritize traveling on more reliable airlines acknowledged for their safety standards and performance.
    - Identify and engage trusted third-party sources for vehicle rentals and/or boat rentals.
    - Ensure cars/vehicles are equipped with safety equipment such as seat belts.
    - Applying safety measures for works associated with the Data Center.

To achieve safety excellence to maximize uptime and reduce operational risks:

- The employer must provide proper tools in perfect working conditions used for the job.
- Ensure every detail of the job, tools, and construction condition is well documented.
- Enabling active participation in OHS risk elimination through the 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 PMU with emphasis on individual OHS responsibilities.

Code of Conduct

All project workers (direct, contracted, primary supply) are required to sign a Code of Conduct prior to starting work. Worker-facing obligations include:

- Prohibition of SEA/SH of community members and co-workers, and of any sexual contact with minors.
- Mandatory GBV/ SEA/SH awareness training at induction and periodic toolbox talks.
- Clear disciplinary consequences for breaches, up to and including dismissal and referral to authorities, applied through the worker grievance/ disciplinary procedure.
- Confidential reporting channel for survivors/ witnesses, separate from standard OHS/grievance reporting lines, linked to the referral network for GBV/ SEA/SH services.

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The Contractor shall develop and implement CESMP in accordance with the Project ESMP and the Code of Conduct that will reflect the contractors' core values and overall working culture. The Code of Conduct will include provisions relating to GBV, SEA/SH, and work ethics and must be understood and signed by all workers. The templates of the Code of Conduct are available in Annex 2.

Labor Influx Management

Given the potential mobilization of some non-local workers, the following procedures need to be applied:

- Local recruitment prioritized and coordinated through Suco Chiefs to reduce the scale of non-local labor influx.
- If a worker camp is established, it will be located near settlements, with defined sanitation, water and security arrangements (follow guideline in the ESMP).
- Community awareness sessions prior to mobilization on expected workforce numbers, conduct expectations (Code of Conduct) and grievance channels.
- Monitoring of secondary effects (local price inflation, pressure on water/sanitation, child-labor risk from induced informal economic activity) as part of routine social monitoring.

Emergency Preparedness and Response

The contractor will prepare an Emergency Response Plan (within the CESMP) covering landslides, hazardous-material spills, oil/fuel spills and work-site accidents, consistent with the ESMP's Emergency Response Plan framework, including:

- Immediate notification chain: incident → Contractor HSE Manager → Construction Supervision Consultant → PMU → MPW, with contact numbers maintained in the CESMP and displayed at the site office.
- Landslide response: Safety & Environmental Walkabout patrols (minimum two staff) on landslide-prone sections, especially during the rainy season; immediate evacuation of the affected area; medical assistance called without delay; warning signage for passing traffic; incident report to PMU.
- Hazardous materials/spill response: trained response team, spill kits and absorptive materials at storage/handling points, approved disposal procedures, and regular inspection of storage areas.
- All emergencies and their handling to be reported in the Contractor's Monthly Progress Report, with serious incidents (fatality, lost-time injury, major spill) reported to PMU and the World Bank within 24 - 48 hours following ESRIT procedures (Annex 1).

8. Age of Employment

The project will only employ workers at a minimum age of 18 years old. To verify the age of workers that will be involved in this project, the following steps shall be implemented:

- For direct workers: cross-check all project workers against the human resources database and information systems to ensure a minimum of 18 years of age; include an age-verification procedure (valid ID check) for new hires in the application process.
- For contracted workers: include a minimum age criterion in the Terms of Reference of the position to be advertised; age-verification procedure (valid ID check) at recruitment/ site induction for all workers in the selection and contract signing process, kept on file by the contractor.
- Primary suppliers (quarry/batching operators) to be screened for child labor risk as part of supply-chain due diligence.
- Awareness-raising with host communities on the risk of child labor arising from increased local economic activity around work sites (e.g., informal goods/services to workers), linked to the GBV/child-protection messaging under the Code of Conduct.

If underage workers are identified, they shall be immediately removed Project work and the case shall be reported and addressed in accordance with the LMP and GRM procedures. Any worker under the age of 18 found performing hazardous work shall be removed from such work, with the case promptly

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reported through the GRM procedure and appropriate remedial measures taken.

9. Terms and Conditions

Employment Conditions

- Project workers shall receive clear, understandable information and documentation about their terms and conditions of employment in the form of written contracts or equivalent documented terms for all contracted workers, in a language/ form workers understand, stating wages, hours, role and duration. The information and documentation shall set out their rights under national labor law and ESS2 requirements, including their rights related to hours of work, wages, overtime, compensation, and benefits. This information should be provided prior to the commencement of work and when any changes occur.
- Freedom of workers to raise concerns and, consistent with national law, to organize, without retaliation. The Labor Law allows all workers and employers without discrimination or need for prior authorization to set up and join organizations for the purpose of promoting and defending their rights and interests, right to collective bargaining, right to strike and lockout, and principles and resolution in case of labor disputes.
- For consultants, the recruitment process will follow the procurement system that has been agreed upon between MPW and the World Bank and follow national procurement of government goods and services.

Wages and Working Hours

- Wage and benefit define remuneration that will be in accordance with the company's payroll procedures and in accordance with the national labor law. Wages for this project at or above the applicable legal minimum and prevailing local rates, paid regularly and on time, with no unauthorized deductions. Wage will be informed to the workers at the time of hiring and shall include wage under the employment agreement, and/or other compensation that the workers are entitled to, such as overtime pay if any.
- Working hours, rest periods and overtime consistent with the National Labor Law. The duration of normal working hours (not exceed 8 hours per day or 44 hours per week), overtime works (shall not exceed 4 hours per day or 16 hours per week during working day and not exceed 8 hours per day on weekend or public holiday), overtime compensation (to be paid at the normal hourly rate plus 50% on working day and normal hourly rate plus 100% on weekend or public holiday), night work (from 21.00 to 6.00 the following day) and compensation (normal hourly rate plus 25%), shift work to not exceed the maximum limits of normal working hours. Working in shift, overtime and variation in the working hours occurs to specific demands of the position.

Termination and leave arrangements.

- This project prohibits the termination of the labor contract due to unfair dismissal in line with national regulations above.
- Leave arrangements also in line with national regulations cover steps of proposing leave, paid annual leave and other specific leave (e.g., illness, maternity, sick).

Insurance/ accident-compensation

All workers must have access to compensation for work-related injury, illness, disability, or death, consistent with ESS 2 and Timor-Leste's Social Security Law (Law No. 12/2016). The contractor is contractually required to register and contribute to the Social Security occupational-accident branch for every worker engaged on the project, including casual and day-rate labor. Where a worker category or risk is not adequately covered by the national scheme, the contractor will provide supplementary insurance so that the level of protection is comparable to the requirements of ESS2. Evidence of registration/insurance coverage is verified by Construction Supervision Consultant prior to mobilization and spot-checked during implementation.

The PMU will similarly ensure their own direct staff and consultants carry appropriate work-injury insurance or equivalent coverage.

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10. GRM

This project provides a mechanism to receive and respond to project workers' grievances throughout the project cycle. All grievances from project workers will be taken seriously and followed up with appropriate actions. The MPW/ PMU will manage the GRM for this project and shall ensure the selected contractor and primary supplier develop and implement a GRM for the Project in an accessible, equitable, and respectful manner, in accordance with national requirements and World Bank ESS 2.

10.1 General Arrangements

The PMU will manage the workers' GRM under the direct responsibility of its GRM Focal Point with support from the Construction Supervision Consultant for implementation and monitoring at project sites. Where the volume or complexity of grievances during construction warrants additional capacity, the PMU may engage a dedicated GRM Officer. The GRM will provide project workers with accessible, confidential, transparent, and effective channels to raise concerns and seek resolution throughout project implementation.

The workers' GRM is proportionate to the nature, scale, and potential risks and impacts of the project. It is designed to address concerns promptly, using an understandable and transparent process, providing timely feedback in a language workers understand, without retribution, and operating independently and objectively.

The workers' GRM may draw on existing grievance-handling arrangements already in place at contractor and construction supervision consultant camps, in coordination with the PMU's central GRM and any community-level complaint-handling mechanisms established by project partners, provided that they are properly designed, implemented, and readily accessible to project workers.

Grievances that may be raised by project workers include, but are not limited to, matters related to employment contracts and terms and conditions of employment, OHS, GBV, sexual exploitation, SEA/SH, discrimination, and fraud. Workers may raise concerns at any time about project-related activities and will not face retaliation, disciplinary action, or other adverse consequences for raising a grievance in good faith.

The worker GRM will be guided by the following principles:

- **Confidentiality and protection:** The identity of a worker submitting a grievance will be kept confidential and will not be disclosed without the worker's consent, except where disclosure is required for appropriate verification, investigation, or resolution. Particular care will be taken in handling sensitive grievances, including those related to GBV - SEA/SH.
- **Non-retaliation**: No retaliation, intimidation, discrimination, or other adverse action will occur against a worker for submitting a grievance in good faith.
- **Impartiality and conflict of interest:** Grievances will be assessed and investigated impartially. Where an investigation is required, the E&S Specialists will ensure that there is no actual or perceived conflict of interest between the complainant and the person(s) responsible for conducting the investigation.
- **Accessibility and non-discrimination**: The GRM will be accessible to all project workers regardless of gender, employment status, position, age, disability, literacy, language, or other characteristics. Workers will be able to submit grievances free of charge through multiple appropriate channels, including verbal or written submissions, telephone, email, grievance boxes, supervisors, labor unions or worker representatives, and other channels communicated by the Project.
- **Anonymous complaints:** Workers may submit grievances anonymously. Anonymous grievances will be registered, assessed, and addressed to the extent possible, while

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maintaining appropriate confidentiality.

- **Transparency and responsiveness:** All grievances will be assessed impartially and handled transparently, with appropriate feedback provided to the complainant where contact information is available. Simple and complex grievances will be addressed as promptly as reasonably possible, and actions taken to resolve grievances will be documented.
- **Accessibility of information:** Information on the GRM, including available grievance channels and procedures for submitting complaints, will be clearly communicated to project workers during recruitment, induction, toolbox meetings, worker consultations, and other appropriate project communications. The Project will also disclose relevant grievance channels through its official information sources.
- **Documentation and tracking**: All grievances, regardless of how they are received, will be recorded by the E&S Specialists in the Grievance Log/ grievance tracking system upon receipt. Each grievance will undergo an initial screening to determine whether it is project-related, followed by appropriate classification, referral, investigation, resolution, and closure.
- **Right to seek further remedy:** If a complainant is not satisfied with the outcome of the GRM or amicable resolution process, they will retain the right to pursue judicial or other legally available remedies at any stage, in accordance with applicable law.

The PMU will ensure that the worker GRM is designed and implemented in a manner that responds to the needs of all workers, including those who may face barriers to accessing conventional grievance channels. Where necessary, reasonable measures will be taken to assist workers with limited literacy, language barriers, disabilities, or other circumstances that may restrict their ability to submit or follow up on a grievance. Worker representatives, supervisors, and other appropriate intermediaries may assist workers in accessing the GRM, provided that confidentiality and the worker's wishes are respected.

10.2 Grievance Channels

The grievance can be submitted by e- mail, website, online platform, telephone, mail, grievance box on the site, etc. The template for grievances will be provided. To make grievance mechanisms accessible to all stakeholders, it is helpful to make the procedures to submit grievances simple and easy to understand and provide an opportunity to submit grievances anonymously. The channels for filing complaints will be listed and communicated to the public during the consultations. The PMU intends to establish the following channels through which project workers can make complaints/suggestions/compliments regarding project activities:

- In writing: addressed to Project Manager at PMU Office – Caicoli, Dili
- by email: environmentpmu2@gmail.com
- Oral/verbal (which should be recorded in writing by the receiver): to Mrs. Adelina do Rego (National Environmental Specialist/GRM Focal Point)
- by phone: +670 7715 1444

For GBV, and particularly for SEA/SH complaints, there are risks of stigmatization, rejection and reprisals against survivors. The GRM therefore has multiple channels through which complaints can be registered in a safe and confidential manner.

10.3 Grievance Redress Procedures

The following worker grievance resolution hierarchy will be followed in case a grievance is raised. This means that, whenever possible, grievances will be resolved at the lower level before escalating them to the upper level. It provides stages to address potential complexity and ensure the right level of management is involved. It aims to address concerns promptly through an understandable, transparent process that provides timely feedback to those concerned, without redistribution.

Grievances are received and resolved at the lowest possible level before escalation, following the tiered procedure below, so that concerns are addressed promptly through a transparent process with

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timely feedback to the worker concerned.

Tier 1: Direct Line Manager/ Supervisor

- A worker raises the grievance with their direct line manager/ supervisor, verbally or in writing; if the grievance concerns that manager/supervisor, it is raised instead with their superior or directly with the E&S Specialists.
- The line manager reports the grievance to the E&S Specialists on site (or via Construction Supervision Consultant at project sites), who responds within 2 working days with a full written explanation of the resolution and, if the worker remains aggrieved, the follow-up/appeal route.
- The grievance is recorded in the Complaints Registry and tracking system; if resolved at this tier, it is marked resolved/closed.

Tier 2: Appeal to Human Resources (HR) and the Next-Level Manager

- If unresolved, the worker may appeal in writing – including via a grievance box or labor union, which forwards the complaint to HR – within 10 working days of the Tier 1 response.
- The next level manager, HR and the E&S Specialists jointly review the appeal and provide a full written response within 7 working days.
- Where the next-level manager at this stage is the PMU Project Manager, the grievance proceeds directly from Tier 1 to Tier 3.
- The tracking system is updated with the outcome of this tier.

Tier 3: Appeal to the PMU Project Manager (with Investigation)

- If still unresolved, the worker may appeal in writing to the PMU Coordinator, copying the E&S Specialists and enclosing the record of prior appeals, within 10 working days of the Tier 2 response.
- The E&S Specialists assigns an investigator or team free of conflict of interest with any party involved; the PMU Project Manager , E&S Specialists and investigation team hear the appeal and provide a full written response within 20 working days.
- On completion, the E&S Specialists finalizes the GRM records and updates the tracking system.

Tier 4: Referral Beyond PMU Competence

- Where a grievance (or a pattern of related grievances) falls outside the PMU's competence to resolve, or remains unresolved after Tier 3, the E&S Specialists compiles the case file and any recommendations for the MPW.
- The Ministry may decide to close the matter, keep it under review pending further information, or refer it to another competent government institution for resolution.

Timeframes at any tier may be extended where genuinely needed, as agreed by both parties. A worker may bring a support person to any meeting and may withdraw a complaint at any time. A confidential channel routes sensitive complaints (harassment, GBV/SEA/SH involving a co-worker) directly to the designated GBV-SEA/SH focal point (Gender Specialist at PMU) rather than the standard line-manager channel.

Grievance Log and Reporting

All stages of every grievance are documented in the grievance Log/ tracking system, and a monthly summary is reported to the PMU. All complaints, including anonymous ones, must be recorded in writing and stored in a database. Complaints received should be assigned a number that will help the assigned specialist to track progress via the database. The database should include at least the date of submission, sphere of issue, responsible party, deadline for problem-solving, and feedback (positive or negative). SEA/ SH related grievances are reported only as aggregate, non-identifying statistics.

The Grievance Focal Point(s), register submitted grievances in the Grievance Log, review them within 15 (fifteen) calendar days (including information verification, cross-checking, and analysis), and follow

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up with the applicant as needed. As necessary, the Grievance Focal Point(s) will involve specialists from other relevant units in this activity. The grievance log will be submitted to the World Bank on a six-monthly basis for review as part of the LMP Implementation report.

10.4 Disclosure and Dissemination of GRM

As part of the LMP, the GRM will be disseminated during the induction program and disclosed through a written poster/flyer posted in a visible and accessible area for all workers, including contractors. The information about the GRM will be included in the communications conducted with the project stakeholders through the communications methods and tools that are part of this stakeholder engagement plan and communications plan under the project, including emails, website, workshops, meetings, Focus Group Discussions (FGDs), etc. Documentation of GRM disclosure and dissemination activity shall be included in the regular LMP Implementation Report.

10.5 Roles and Responsibilities for GRM

The responsibilities for managing the GRM system include the following and may be updated from time to time in consultation with PMU and MPW.

- Overall management of the GRM system: Mrs. Adelina do Rego (National Environmental Specialist)
- Developing and maintaining awareness-building: Mrs. Adelina do Rego (National Environmental Specialist)
- Collection of complaints: Mrs. Adelina do Rego (National Environmental Specialist)
- Recording complaints: Mrs. Adelina do Rego (National Environmental Specialist)
- Notification to the complainant on the receipt and timeline to review a complaint: Mrs. Adelina do Rego (National Environmental Specialist)
- Sorting/categorization of complaints: Mrs. Adelina do Rego (National Environmental Specialist)
- Thorough review of the issues, including the causal link between project activities and alleged damage/harm/nuisance: depending on the issues (to involve relevant parties, i.e., technical/design, E&S, etc.)
- Decision-making based on such examination: Amilcar Victor (Project Manager)
- Processing appeals or continuous communication with complainants with the purpose of resolving issues amicably: Mrs. Adelina do Rego (National Environmental Specialist)
- Publishing responses to complaints, unless otherwise is requested by complainants due to privacy or other concerns: Mrs. Adelina do Rego (National Environmental Specialist)
- Organization and implementation of information materials and awareness campaigns: Mrs. Adelina do Rego (National Environmental Specialist)
- Reporting and feedback on GRM results: Mrs. Adelina do Rego (National Environmental Specialist)

10.6 Monitoring and reporting on GRM implementation

The PMU will regularly track and monitor the status of complaints to ensure that all grievances are resolved within the established timeframe and publish reports available to relevant stakeholders that will contain the following information:

- Status of establishment of the GRM (procedures, staffing, awareness building, etc.), aggregated data on the number of grievances received, the number that were relevant, and the number resolved.
- Qualitative data on the type of complaints and answers provided, issues that are unresolved and time taken to resolve complaints.
- Any issues faced with the procedures/ staffing or use or factors that may be affecting the use

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of the GRM/ beneficiary feedback system.
- Any corrective measures suggested/ adopted.

The PMU will compile a report summarizing GRM results on a six-monthly basis. The GRM will be revised and updated, supplemented as needed with project-specific arrangements, and publicly disclosed.

11. SEA/ SH Prevention and Response

This section expands the project's approach to SEA/SH beyond the general Code of Conduct. This section will be linked to the project's stand-alone SEA/SH Action Plan in the ESMP.

SEA refer to actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another; sexual abuse is actual or threatened physical intrusion of a sexual nature, including inappropriate touching, by force or under unequal/coercive conditions. SH is unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature between co-workers or between a worker and a community member.

Behaviors Constituting SEA/SH: The following non-exhaustive list is intended to illustrate types of prohibited behaviors. Examples of SEA include, but are not limited to:

- A worker tells a member of the community that he/she can get them jobs related to the work site (e.g. cooking and cleaning) in exchange for sex.
- A worker that is connecting water supply to households says that he can connect women headed households to the water supply in exchange for sex.
- A worker rapes, or otherwise sexually assaults a member of the community.
- A worker denies a person access to the site unless he/she performs a sexual favor.
- A worker tells a person applying for employment under the Project contract that he/she will only hire him/her if he/she has sex with him/her.
- Examples of sexual harassment in a work context:
  - workers comment on the appearance of another worker (either positive or negative) and sexual desirability.
  - When a worker complains about comments made by another worker on his/her appearance, the other worker comments that he/she is “asking for it” because of how he/she dresses.
  - Unwelcome touching of a worker by another worker.
  - A worker tells another worker that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.

Codes of Conduct: There are three forms of Code of Conduct to prevent SEA/SH cases include Company/ Firm, Manager, and Individual Code of Conducts . All Code of Conducts are annexed to worker and company contracts respectively and enforced through the disciplinary and grievance procedures in the above sections.

- Individual Code of Conduct: signed by every worker before starting work, setting out prohibited behavior (SEA/SH, any sexual contact with a person under 18 regardless of local age of majority or consent, and use of project resources/position to solicit sexual favors), reporting obligations, and consequences of breach.
- Manager's Code of Conduct: signed by all managers and supervisors, committing them to uphold and enforce the Code of Conduct, ensure all workers under their supervision sign the individual Code of Conduct and receive SEA/SH training, provide a safe and confidential environment for reporting, report and act on any suspected or reported SEA/SH incident in line with the GRM and referral procedures, protect survivors and whistle-blowers from retaliation, and apply disciplinary measures for breaches.
- Company/Firm Code of Conduct: signed by the Contractor (and subcontractors/ primary suppliers as applicable) at company level, committing to a zero-tolerance policy on SEA/SH,

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implementation of the GBV-SEA/SH Action Plan, appointment of a GBV-SEA/SH/social Focal Point, budget allocation for GBV prevention and response measures, and cooperation with PMU/ Construction Supervision Consultant monitoring.

Roles and Responsibilities:

- Contractor GBV-SEA/SH/ Social Focal Point: day-to-day implementation of Code of Conduct training and awareness, first point of contact for SEA/SH-related concerns raised by workers, liaison with the community GRM and any SEA/SH Service Provider.
- PMU GBV-SEA/SH Focal Point (Gender Specialist): oversight of Contractor performance on SEA/SH prevention, receipt of serious-incident reports, liaison with municipal social welfare and health authorities and the national GBV referral network
- Construction Supervision Consultant: verification that Code of Conduct training, signage and reporting channels are functioning as part of routine site supervision.
- SEA/SH Service Provider(s): where engaged, provide survivor support services (health, psychosocial, legal, safety) and receive referrals; the project will identify and formalize links with the nearest available providers given the distances noted in Section 4.

Prevention Measures and Training:

- Mandatory SEA/SH and GBV awareness training for all workers at induction, with periodic refresher toolbox talks throughout the work.
- Community-facing awareness sessions, delivered with local women's representatives/ leaders present, on worker conduct expectations and how to report a concern.
- Siting and lighting of any worker accommodation away from residential areas, with separate, lockable sanitation facilities for women.
- Restrictions on worker interaction with children built into the Individual Code of Conduct.

Reporting and Referral Pathway: Reporting follows a survivor-centered approach: the safety, confidentiality, dignity and wishes of the survivor take precedence over any other consideration, including proof for disciplinary action. Multiple entry points are available so a survivor or witness can choose the channel they are most comfortable with, such as directly to the Contractor's GBV-SEA/SH/ Social Focal Point or PMU GBV- SEA/SH Focal Point (Gender Specialist) or through the worker grievance mechanism or the community GRM, both of which route sensitive complaints to the designated focal point rather than the standard channel, or directly to a SEA/SH service providers. All reports are handled confidentially, with information shared only on a need-to-know basis and never disclosed publicly; no survivor is required to confront the alleged perpetrator or provide details beyond what they are comfortable sharing to receive support and referral

Sanctions and Accountability: Breaches of the Code of Conduct are addressed through a proportionate disciplinary matrix that will be included in the SEA/SH Action Plan, ranging from verbal/ written warning for minor breaches (e.g., inappropriate language) to immediate dismissal and referral to police for serious breaches (SEA/SH any sexual contact with a minor). Dismissal for a serious breach does not depend on a survivor pursuing a formal complaint or criminal case. The PMU and Contractor's disciplinary process operates independently of, and does not substitute for, any criminal justice processes the survivor may choose to pursue.

Monitoring: Monitoring of SEA/SH prevention and response measures will include tracking the percentage of workers who have signed the Individual Code of Conduct prior to commencing work, the number and topics of SEA/SH training and awareness sessions provided to workers and host communities, the number and status of SEA/SH related reports received through any channel, recorded without identifying survivors, and periodic verification of the functionality of the referral pathway, including confirmation of contact with the nearest qualified SEA/SH service provider.

12. Contractor and Primary Supply Management

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Third parties or firms will be required to follow the national legislation requirements and measures described in the LMP and shall submit a six-monthly report on the implementation to the E&S Specialists. This requirement will be explicitly stated in the bidding documents, with the expectation that the Contractor/Primary Supplier should include budgeting for implementing, monitoring, and reporting of Labor Management-related activities, including OHS incident compensation and referral services for SEA/SH cases.

This project will select third parties or firms using the procedures identified and agreed in the Procurement Plan and will include in their contract references regarding general labor policies (wages and benefits, working hours, overtime, termination) relevant to their roles and positions, as well as provisions of occupational health and safety procedures and access to grievances management system identified in the above sections. These terms and conditions will be in line, at a minimum, with the LMP and the national labor law, and specified in the standard contracts to be used by the third parties/ firms under the project.

Regarding primary supply workers, contractor to identify primary suppliers of core project materials (aggregate/quarry, batching/asphalt plant, fuel) prior to mobilization and ensure basic due-diligence screening of primary suppliers for child labor, forced labor and fundamental OHS practice, using a simple checklist appended to the CESMP. Where significant risks are identified, contractor to require corrective action from the supplier or, if uncorrected, change supplier.

PMU will manage and monitor contractors' performance in relation to contracted workers, focusing on contractors' compliance with their contractual agreements in line with their responsibilities in this LMP (Section 6.3). All queries related to LMP from contractor/ primary supplier can be addressed to the PMU E&S Specialists, Construction Supervision Consultant, or PMU Project Manager .

13. Monitoring and Reporting

The purpose of monitoring and reporting under this LMP is to ensure that labor and working conditions are managed in accordance with national legislation and the project's E&S requirements.

11.1 Monitoring Arrangements

Monitoring will focus on verifying compliance with labor standards, identifying emerging issues, and ensuring that corrective measures are implemented in a timely manner. Monitoring of LMP implementation will be carried out at multiple levels.

At the Project site level, contractors and primary suppliers are responsible for the day-to-day implementation and monitoring of labor management measures, including OHS, worker conditions, and Code of Conduct compliance of their own workers, subcontractors, and other personnel under their authority. The Construction Supervision Consultant will conduct routine site inspections and oversee the implementation of labor management measures by contractors and primary suppliers. This includes verifying compliance with contractual requirements, LMP provisions, and applicable E&S instruments (e.g., CESMP). At the Project level, the E&S Specialists within the PMU will oversee overall LMP implementation, including reviewing monitoring information, identifying non-compliance issues, and ensuring corrective actions are taken.

11.2 Reporting Requirements

Contractors and primary suppliers are required to provide regular information on labor management to the Project, through the Construction Supervision Consultant. This includes:

- Number and type of workers employed (including local and non-local workers);
- OHS performance, including incidents and accidents;
- Implementation of Code of Conduct (including SEA/SH provisions);
- Worker accommodation and welfare conditions (where applicable); and

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- Grievance log and summary of worker grievances and their resolution status. Sensitive grievances, particularly those related to SEA/SH, will be handled confidentially and reported in aggregated form.

Reports will be submitted periodically every six months, and immediately in the case of serious incidents or accidents (fatality, lost-time injury, major spill) reported to PMU and the World Bank within 24 - 48 hours). The Construction Supervision Consultant will review and consolidate this information and submit regular reports to the PMU E&S Specialists.

The E&S Specialists within the PMU are responsible for compiling all labor-related information received from contractors, primary suppliers, and the Construction Supervision Consultant. This information will be used to prepare periodic summaries of LMP implementation, which will form part of the Project E&S Implementation Progress Reports. The reports will include the status of LMP implementation, key labor-related risks and issues identified, a summary of grievances and resolutions, OHS performance, and corrective actions taken or required. LMP monitoring results will be reported as part of the Project's regular E&S Implementation Progress Reports from PMU to the World Bank and use as internal monitoring updates as required during construction.

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ANNEX 1: Incident Reporting Procedure and Form

This annex summarizes the incident reporting steps, the full incident report form, and category definitions.

A. Incident Reporting Procedure:

- Immediate notification: the contractor notifies the PMU E&S Specialists and Construction Supervision Consultant as soon as a reportable incident occurs or becomes known, by the fastest available means (phone/email).
- Formal reporting within 24 - 48 hours: the PMU completes and submits the incident report form to the World Bank within 24 - 48 hours of the incident occurring or of the PMU becoming aware of it, covering incident type, date/time, parties involved and an initial description.
- Follow-up investigation and corrective action: the PMU E&S Specialists coordinates an incident investigation and, where required by the World Bank, a corrective action plan with defined timeframes and responsibilities.
- Monthly summary: all reportable incidents (open and closed) are included in the monthly PMU report to the World Bank alongside the grievance summary, with SEA/SH incidents reported only as aggregate, non-identifying statistics.

B. Incident Form:

B1: Incident Details			
Date of Incident:	**Time:**	**Date Reported to PIU:**	**Date Reported to WB:**
Reported to PIU by:	**Reported to WB by**:	**Notification Type**: Email/phone call/media notice/other	
Full Name of Main Contractor:		**Full Name of Subcontractor**:	

B2: **Type of incident (please check all that apply)**[1]
Fatality ☐ Lost Time Injury ☐ Displacement Without Due Process ☐ Child Labor ☐ Acts of Violence/Protest ☐ Disease Outbreaks ☐ Forced Labor ☐ Unexpected Impacts on heritage resources ☐ Unexpected impacts on biodiversity resources ☐ Environmental pollution incident ☐ Dam failure ☐ Other ☐

[1]See Incident type below for definitions

B3: Description/Narrative of Incident
Please replace text in italics with brief description, noting for example: *I. What is the incident?* *II. What were the conditions or circumstances under which the incident occurred (if known)?* *III. Are the basic facts of the incident clear and uncontested, or are there conflicting versions? What are those versions?* *IV. Is the incident still ongoing or is it contained?* *V. Have any relevant authorities been informed?*

B4: Actions taken to contain the incident			
Short Description of Action	**Responsible Party**	**Expected Date**	**Status**
For incidents involving a contractor: Have the works been suspended (for example, under GCC8.9 of Works Contract)? Yes ☐; No ☐; Trading name of Contractor (if different from B1):			

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Please attach a copy of the instruction suspending the works.

B5: What support has been provided to affected people

C. Incident Types

The following are incident types to be reported using the environmental and social incident response process:

Fatality: Death of a person(s) that occurs within one year of an accident/incident, including from occupational disease/illness (e.g., from exposure to chemicals/toxins).

Lost Time Injury: Injury or occupational disease/illness (e.g., from exposure to chemicals/toxins) that results in a worker requiring 3 or more days off work, or an injury or release of substance (e.g., chemicals/toxins) that results in a member of the community needing medical treatment.

Acts of Violence/Protest: Any intentional use of physical force, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, deprivation to workers or project beneficiaries, or negatively affects the safe operation of a project worksite.

Disease Outbreaks: The occurrence of a disease in excess of normal expectancy of number of cases. Disease may be communicable or may be the result of unknown etiology.

Displacement Without Due Process: The permanent or temporary displacement against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection and/or in a manner that does not comply with an approved resettlement action plan.

Child Labor: An incident of child labor occurs: (i) when a child under the age of 14 (or a higher age for employment specified by national law) is employed or engaged in connection with a project, and/or (ii) when a child over the minimum age specified in (i) and under the age of 18 is employed or engaged in connection with a 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.

Forced Labor: An incident of forced labor occurs when any work or service not voluntarily performed is exacted rom an individual under threat of force or penalty in connection with a project, including any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. This also includes incidents when trafficked persons are employed in connection with a project.

Unexpected Impacts on heritage resources: An impact that occurs to a legally protected and/or internationally recognized area of cultural heritage or archaeological value, including world heritage sites or nationally protected areas not foreseen or predicted as part of project design or the environmental or social assessment.

Unexpected impacts on biodiversity resources: An impact that occurs to a legally protected and/or internationally recognized area of high biodiversity value, to a Critical Habitat, or to a Critically Endangered or Endangered species (as listed in IUCN Red List of threatened species or equivalent national approaches) that was not foreseen or predicted as part of the project design or the environmental and social assessment. This includes poaching or trafficking of Critically Endangered or Endangered species.

Environmental pollution incident: Exceedances of emission standards to land, water, or air (e.g., from chemicals/toxins) that have persisted for more than 24 hrs or have resulted in harm to the environment.

Dam failure: A sudden, rapid, and uncontrolled release of impounded water or material through overtopping or breakthrough of dam structures.

Other: Any other incident or accident that may have a significant adverse effect on the environment, the affected communities, the public, or the workers, irrespective of whether harm had occurred on that occasion. Any repeated non-compliance or recurrent minor incidents which suggest systematic failures that the task team deems needing the attention of Bank management.

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ANNEX 2. Code of Conduct

1. Company/ Firm Code of Conduct *[This is an example for Company CoC, it will be adjusted as needed to be aligned with existing PMU Code of Conduct for Manager and Individual]*

Company/Firm Code of Conduct
Preventing Sexual Exploitation, Abuse, and Harassment

The company _____(name) is committed to creating and maintaining an environment in which Gender based Violence/Sexual Exploitation and Abuse and Sexual Harassment (GBV/SEA/SH) have no place, and where they will not be tolerated by any employees engaged by the company.

Therefore, to ensure that all those engaged in the project are aware of this commitment, the company commits to the following core principles and minimum standards of behavior that will apply to all company employees, associates, and representatives without exception:

General

1. The company – and therefore all employees, associates, and representatives – commit to complying with all relevant national laws, rules and regulations.
2. The company commit to treating 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, births or other status. Acts of SEA/SH are in violation of this commitment.
3. The company shall ensure that interactions with peers and other project workers are carried out with respect and non-discrimination.
4. Demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behavior are prohibited among all company employees, associates, and representatives.
5. The company will follow all reasonable work instructions in line with the national law and the Labor Management Procedure (LMP), including Environmental, Social, Health and Safety (ESHS) and Occupational Health and Safety (OHS) standards for the project.

Sexual Exploitation and Abuse, and Sexual Harassment (SEA/SH)

1. Acts of SEA/SH constitute gross misconduct and are therefore grounds for sanctions, which may include penalties and/or termination of employment, and if appropriate referral to the police for further action.
2. All forms of SEA/SH, including grooming, are unacceptable, regardless of whether they take place on the work site, the work site's surroundings, at workers' camps or within the local community.
   I. Sexual Harassment – 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 – is prohibited.
   II. Sexual favors – for instance, making promises or favorable treatment dependent on sexual acts – or other forms of humiliating, degrading or exploitative behavior, are prohibited.
   III. Sexual contact or activity with children under the age of 18 – including through digital media – is prohibited. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
3. Unless there is full consent[3] by all parties involved in the sexual act, sexual interactions between the company's employees (at any level) and members of the communities surrounding the workplace are prohibited. This includes relationships involving the withholding/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.
4. In addition to company sanctions, legal prosecution of those who commit acts of SEA/SH will be pursued if appropriate.
5. All employees, including volunteers and sub-contractors, are highly encouraged to report suspected or actual acts of SEA/SH by a fellow worker, whether in the same company or not. Reports must be made

[3] Consent is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the Project considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

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in accordance with project's SEA/SH Allegation Procedures.
6. Managers are required to report and act to address suspected or actual acts of SEA/SH as they have a responsibility to uphold company commitments and hold their direct reports responsible.

Implementation

To ensure that the above principles are implemented effectively the contractors commit to ensuring that:

1. All managers sign the Project's 'Manager's Code of Conduct' detailing their responsibilities for implementing the company's commitments and enforcing the responsibilities in the 'Individual Code of Conduct'.
2. All employees sign the Project's 'Individual Code of Conduct' confirming their agreement to comply with OHS standards, and not to engage in activities resulting in SEA/SH.
3. Displaying the Company and Individual Codes of Conduct prominently and in clear view.
4. Ensure that posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language as well as for any international staff in their native language.
5. An appropriate person is nominated as the company's 'Focal Point' for addressing SEA/SH issues.
6. Ensuring that the SEA/SH Codes of Conduct are effectively implemented and revised as needed.
7. That the company/firm effectively implement the agreed final SEA/SH Codes of Conduct, providing feedback to the PMU Project Manager or other function(s) as applicable for improvements and updates as appropriate.
8. All employees attend an induction training course prior to mobilization to ensure they are familiar with the Project's SEA/SH Codes of Conduct as well as refresher training as relevant.

I do hereby acknowledge that I have read the foregoing Company/Firm Code of Conduct, and on behalf of the company agrees to comply with the standards contained therein. I understand my role and responsibilities to prevent and respond to SEA/SH. I understand that any action inconsistent with this Company/Firm Code of Conduct or failure to act mandated by this Code of Conduct may result in disciplinary action.

Company name: _____
Signature: _____
Printed Name: _____
Title: _____
Date: _____

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2. Manager Code of Conduct

Manager's Code of Conduct
Implementing Environmental, Social, Health, and Safety (ESHS) and Occupational, Health, and Safety (OHS) Standards
Preventing Sexual Exploitation and Abuse, and Sexual Harassment (SEA/SH)

The Institution of Project Management Unit (PMU), is committed to ensuring that the project is implemented in such a way which minimizes any negative impacts on the PMU staff, local environment, communities, and its workers. This will be done by respecting the ESHS standards, and ensuring appropriate OHS standards are met. PMU is also committed to creating and maintaining an environment where children under the age of 18 will be protected, and where SEA/SH have no place. Improper actions towards children, SEA/SH are acts of Gender Based Violence (GBV) and as such will not be tolerated by any employee, sub-contractors, supplier, associate, or representative of the company.

Managers at all levels have a responsibility to uphold the company's commitment. Managers need to support and promote the implementation of the Company Code of Conduct. To that end, managers must adhere to this Manager's Code of Conduct and to sign the Individual Code of Conduct. This commits them to supporting the implementation of the Contractor Environmental and Social Management Plan (CESMP), the OHS Management Plan, and developing systems that facilitate the implementation of the SEA/SH Action Plan.

Managers need to maintain a safe workplace, as well as a SEA/SH free environment at the workplace and in the local community. Their responsibilities to achieve this include but are not limited to:

Implementation

1. To ensure maximum effectiveness of the Company and Individual Codes of Conduct:
    - Prominently displaying the Company and Individual Codes of Conduct in clear view at workers' camps, offices, and in public areas of the workspace. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.
    - Ensuring all posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.
2. Verbally and in writing explain the Company and Individual Codes of Conduct to all staff.
3. Ensure that:
    - All direct reports sign the 'Individual Code of Conduct', including acknowledgment that they have read and agree with the Code of Conduct.
    - Staff lists and signed copies of the Individual Code of Conduct are provided to the OHS Manager, Contractor's SEA/SH Focal Point, and the PMU.
    - Participate in training and ensure that staff also participate as outlined below.
    - Put in place a mechanism for staff to:
        a) report concerns on ESHS or OHS compliance; and,
        b) confidentially report SEA/SH incidents through the Grievance Redress Mechanism (GRM)
    - Staff are encouraged to report suspected or actual ESHS, OHS, GBV issues, emphasizing the staff's responsibility to the Company and the country hosting their employment, and emphasizing the respect for confidentiality.
4. In compliance with applicable laws and to the best of your abilities, prevent perpetrators of SEA/SH from being hired, re-hired or deployed. Use background and criminal reference checks for neither employees nor ordinarily resident in the country where the works are taking place.
5. Ensure that when engaging in partnership, sub-contractor, supplier or similar agreements, these agreements:
    - Incorporate the ESHS, OHS, and SEA/SH Codes of Conduct as an attachment.
    - Include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers, to comply with the Individual Codes of Conduct.
    - Expressly state that the failure of those entities or individuals, as appropriate, to ensure compliance with the ESHS and OHS standards, take preventive measures against GBV, to investigate allegations thereof, or to take corrective actions when GBV has occurred, shall not only constitute grounds for sanctions and penalties in accordance with the Individual Codes of Conduct but also termination of agreements to work on or supply the project.
6. Provide support and resources to the Contractor's SEA/SH Focal Point to create and disseminate internal sensitization initiatives through the awareness-raising strategy under the GBV Action Plan.

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7. Ensure that any SEA/SH complaint warranting Police action is reported to the police, the PMU and the World Bank immediately.
8. Report and act in accordance with the agreed response protocol any suspected or actual acts of SEA/SH.
9. Ensure that any major ESHS or OHS incidents are reported to the PMU and the supervision engineer immediately, non-major issues in accordance with the agreed reporting protocol.
10. Ensure that children under the age of 18 are not present at the construction site or engaged in any hazardous activities.

Training

11. The managers are responsible for:
    - Ensuring that the OHS Management Plan and SEA/SH Action Plan is implemented, with suitable training required for all staff, including sub-contractors and suppliers; and,
    - Ensuring that staffs have a suitable understanding of the CESMP and are trained as appropriate to implement the CESMP requirements.
12. All managers are required to attend an induction manager training course prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding the GBV elements of these Codes of Conduct. This training will be separate from the induction training course required of all employees and will provide managers with the necessary understanding and technical support needed to begin to develop the SEA/SH Action Plan for addressing GBV issues.
13. Managers are required to attend and assist with the project facilitated monthly training courses for all employees. Managers will be required to introduce the training and announce the self-evaluations, including collecting satisfaction surveys to evaluate training experiences and provide advice on improving the effectiveness of training.
14. Ensure that time is provided during work hours and that staff prior to commencing work on site attend the mandatory project facilitated induction training on:
    I. OHS and ESHS; and,
    II. Preventing and addressing SEA/SH and required of all employees.
15. During civil work, ensure that staff attend ongoing OHS and ESHS training, as well as the monthly mandatory refresher training course required of all employees on SEA/SH.

Response

16. Managers will be required to take appropriate actions to address any ESHS or OHS incidents.
17. Regarding SEA/SH:
    I. Provide input to the SEA/SH Action plan.
    II. Once adopted by the Company, managers will uphold the accountability measures set forth in the SEA/SH Action Plan to maintain the confidentiality of all employees who report or (allegedly) perpetrate incidences of SEA/SH (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law).
    III. If a manager develops concerns or suspicions regarding any form of SEA/SH by one of his/her direct reports, or by an employee working for another contractor on the same work site, he/she is required to report the case using the GRM.
    IV. Once a sanction has been determined, the relevant manager(s) is/are expected to be personally responsible for ensuring that the measure is effectively enforced, within a maximum timeframe of 14 days from the date on which the decision to sanction was made by the company (Company's Director with the consultation to SEA/SH Focal Point, PMU and Service Provider).
    V. If a manager has a conflict of interest due to personal or familial relationships with the survivor and/or perpetrator, he/she must notify the Company and the SEA/SH Focal Point and PMU. The Company will be required to appoint another manager without a conflict of interest to respond to complaints.
    VI. Ensure that any SEA/SH issue warranting police action is reported to the police, the PMU and the World Bank immediately.
18. Managers failing to address ESHS or OHS incidents or failing to report or comply with the GBV provisions may be subject to disciplinary measures, to be determined and enacted by the Company's Director or equivalent highest-ranking manager. Those measures may 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

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maximum of 6 months.
- Termination of employment.

19. Ultimately, failure to effectively respond to ESHS, OHS, and SEA/SH cases on the work site by the company's managers or the Director may provide grounds for legal actions by authorities.

I do hereby acknowledge that I have read the foregoing Manager's Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, and GBV requirements. I understand that any action inconsistent with this Manager's Code of Conduct or failure to act mandated by this Manager's Code of Conduct may result in disciplinary action.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

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3. Individual Code of Conduct

Individual Code of Conduct
Implementing Environmental, Social, Health, and Safety (ESHS) and Occupational, Health, and Safety (OHS) Standards
Preventing Sexual Exploitation and Abuse, and Sexual Harassment (SEA/SH)

I, _____, acknowledge that adhering to ESHS standards, following the project's OHS requirements, and preventing Gender Based Violence (GBV) is important.
The institution of, Project Management Unit (PMU), considers that failure to follow ESHS and OHS standards, or to partake in activities constituting GBV—be it on the work site, the work site surroundings, at workers' camps, or the surrounding communities—constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution by the police of those who commit SEA/SH may be pursued if appropriate.

I agree that while working on the project I will:

1. Consent to Police background check.
2. Attend and actively partake in training courses related to ESHS, OHS, and SEA/SH as requested by my employer.
3. Wear my personal protective equipment (PPE) at all times when at the work site or engaged in project related activities.
4. Take all practical steps to implement the Project Environmental and Social Management Plan (ESMP).
5. Implement the OHS Management Plan.
6. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties at all times.
7. 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.
8. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
9. Not sexually exploit or abuse project beneficiaries and members of the surrounding communities.
10. Not engage in sexual harassment of work personnel and staff —for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature is prohibited, e.g., looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; send/ upload sexual chats/ pictures through phone or digital media; in some instances, giving personal gifts for sexual activities.
11. Not engage in sexual favors, for instance, making promises of favorable treatment (e.g. promotion), threats of unfavorable treatment (e.g. loss of job) or payments in kind or in cash, dependent on sexual acts or other forms of humiliating, degrading or exploitative behavior.
12. Not use prostitution in any form at any time.
13. Not participate in sexual contact or activity with children under the age of 18, 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.
14. 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 (including prostitution). Such sexual activity is considered "non-consensual" within the scope of this Code.
15. Consider reporting through the grievance redress mechanism (GRM) or to my manager any suspected or actual SEA/SH 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:

16. Bring to the attention of my manager the presence of any children on the construction site or engaged in hazardous activities.
17. Wherever possible, ensure that another adult is present when working in the proximity of children.
18. Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or physical danger.
19. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also "Use of children's images for work related

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purposes" below).

20. Refrain from physical punishment or discipline of children.
21. Refrain from hiring children for domestic or other labor below the minimum age of 14 unless national law specifies a higher age, or which places them at significant risk of injury.
22. Comply with all relevant local legislation, including labor laws in relation to child labor and World Bank's safeguard policies on child labor and minimum age.
23. Take appropriate caution when photographing or filming children.

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

24. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
25. 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.
26. Ensure photographs, films, and videos 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.
27. Ensure images are honest representations of the context and the facts.
28. 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:

1. Informal warning.
2. Formal warning.
3. Additional Training.
4. Loss of up to one week's salary.
5. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
6. Termination of employment.
7. Report to the police if warranted.

I understand that it is my responsibility to ensure that the ESHS standards are met. That I will adhere to the OHS Management Plan. That I will avoid actions or behaviors that could be construed as GBV. Any such actions will be a breach of 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 ESHS, OHS, GBV issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____
Printed Name: _____
Title: _____
Date: _____

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ANNEX 3. Grievance Registry Form

Below is an example of grievance registry form:

GRIEVANCE FORM

Grievance Number	:
Name of Project Worker/ Initial	:
Gender	:
Position/ Affiliation (PMU staff/ construction supervision consultant/ Contractor/ etc.)	:
Contact information (Phone/address/email)	:
Description of Complaint	:
Desired Follow-up	:

……., ……20…
Project Worker

(……)

The settlement form and response will be sent to the project worker according to the address and email included in the report.

CASE COMPLETION FORM

	Complaint Number: ***(Adjust the complaint number with form A. Complaint letter)***
	This form instruction is filled in by PMU E&S Specialist
Complaint/Complaint Completion Date:	Name of the Form Filler Staff:
Completion Descriptio	
Photo/ Documentation (if any):	
Complaints can be received and considered completed by the complainant on the date	
Project worker Name	PMU E&S Specialist/ PMU Project Manager Name

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Grievance Log

Maintained by the PMU E&S Specialist. One row per grievance; duplicate rows as needed. Fields marked confidential (complainant identity) are restricted to the E&S Specialist and, where consented, the investigation team only.

Grievance ID	Date Received / Channel	Category	Brief Description	Action Taken / Responsible / Date	Status

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Annex 4: Primary-Supplier Labor Risk Screening Checklist

Category	Screening Question	Y/N	Evidence / Comments
Child Labor	Does the supplier employ anyone under 18 in hazardous roles, or anyone under 15 in any role?		
Child Labor	Does the supplier have an age-verification process (ID check) at recruitment?		
Forced Labor	Is there any evidence of debt bondage, retained wages, or restricted freedom of movement for workers?		
Forced Labor	Does the supplier retain workers' identity documents?		
Wages & Hours	Are workers paid at or above the national minimum wage, on a regular schedule?		
Wages & Hours	Are working hours reasonable and consistent with national law?		
OHS	Is basic PPE (dust masks, ear protection, hard hats as relevant) provided and used?		
OHS	Are machinery/crushing equipment adequately guarded?		
OHS	Has the supplier had any recent fatal or serious injury incidents?		
Grievance / Communication	Do the supplier's workers have any means to raise concerns about pay or conditions?		

Annex 5: Emergency Contact List Template

To be completed and displayed at the site office, work fronts and any worker camp before mobilization, and kept current throughout construction.

Role / Organization	Name	Phone	Email	Notes
Contractor HSE Manager				
Contractor Site Manager				
Contractor SEA/SH /Social Focal Point				
PMU E&S Specialists				
PMU Project Manager				
Construction Supervision Consultant				
Nearest Health Post/Clinic				
Nearest Referral Hospital				
PNTL (local police post)				
PNTL Vulnerable Persons Unit				
GBV Service Provider / rede referál contact				

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