



**GOVERNMENT OF LIBERIA**

**Ministry of Commerce and Industry  
Ministerial Complex  
Congo Town, Monrovia**



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**Liberia Investment, Finance, and Trade (LIFT) Project**

Loan No./Credit No./ Grant No.: **(P171997)**

**LABOR MANAGEMENT PROCEDURES (LMP)**

December 7, 2021

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## **LIST OF ACRONYMS**

AS	Analytical Study
CBL	Central Bank of Liberia
CCB	Climate Co-Benefit
CERC	Contingent Emergency Response Component
CPF	Country Partnership Framework
CoC	Code of Conduct
COVID-19	Corona Virus-19
DFS	Digital Financial Services
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environment and Social Standard
G2D	Government to Business
GBV	Gender based Violence
GoL	Government of Liberia
GRM	Grievance Redress Mechanism
GRP	Government Recovery Program
IFC	International Finance Corporation
IMCC	Inter-Ministerial Concessions Committee
JET	Jobs and Economic Transformation
LBR	Liberia Business Registry
LIFT	Liberia Investment, Finance, and Trade
LMP	Labour Management Procedure
LoC	Line of Credit
IPP	Investment Policy and Promotion
LPRS	Liberian Poverty Reduction Strategy
MoCI	Ministry of Commerce and Industry
MSMEs	Micro Small and Medium Enterprises
NEPS	National Electronic Payments Switch
NGO	Non- Government Organization
NSW	National Single Window
OHS	Occupational Health and Safety
OSS	One-Stop-Shop
PIU	Project Implementation Unit
POM	Project Operating Manual
PPD	Public-Private Dialogue
SBA	Small Business Administration
SEA	Sexual Exploitation and Abuse
SEZ	Special Economic Zone
SH	Sexual Harassment (SH)
SMEs	Small and Medium Enterprises
SOP	Standard Operating Procedures
TA	Technical Assistance
WBG	World Bank Group
WGRMC	Workers Grievance Redress Management Committee

## **EXECUTIVE SUMMARY**

This Labour Management Procedure (LMP) is intended to provide the framework to address the specific labour related risks and impacts that are anticipated to occur as a result of the implementation of the Liberia Investment, Finance, and Trade (LIFT) Project. The development objective of the LIFT Project is to improve the investment climate, expand access to finance, and facilitate trade in Liberia. The project has four (4) components namely:

- Component 1: Trade and Investment-Enabling Environment
- Component 2: SME Access to Markets and Finance
- Component 3: Digital Financial Services Infrastructure
- Component 4: Project Implementation, M&E and CERC

The LMP has been developed with the purpose of protecting the health, safety, rights and wellbeing of project workers who will be engaged during the implementation of the LIFT Project. It is also intended to promote equal opportunity and non-discrimination in the management of the workforce taking into consideration both national and international labour requirements including the World Bank's Standard on Labour and Working Conditions (Environment and Social Standard: ESS 2).

The scope of the LMP covers all aspects of the project that will require the hiring of the workforce to execute the project activities. It is applicable to all types of project workers: skilled and unskilled: full-time, part-time, temporary, seasonal or migrant workers; and deals with all aspects relating to recruitment, labour and working conditions, remuneration, management of worker relationships and Occupational Health and Safety (OHS) as well as work-based grievance redress mechanisms. The LMP is applicable, as per ESS2, to the Project in the following manner:

- People employed or engaged directly by PIU to work specifically in relation to the Project;
- People employed or engaged by third parties, such as contractors and SMEs, to perform work related to core function of the project, regardless of location;
- People employed or engaged by the primary suppliers under this project

The objectives of the labour management procedures are to:

- Promote safety, good health and employee welfare of project workers;
- Protect project workers, including vulnerable workers such as women, persons with disabilities, children, migrant workers, contracted workers, and primary supply workers as appropriate;
- Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national laws;
- Provide project workers with accessible means to raise workplace concerns.

The project workers will be categorized as direct workers, contract workers, community workers, marginalized workers, and primary supply workers in accordance with the ESS 2.

The anticipated labour risks of the project include:

- Occupational risks and hazards (incidents and accidents);
- Risk of Contracting COVID-19;
- Labour influx and associated Gender-Based Violence (GBV);
- Risk of contracting HIV and AIDS and other STIs -Risk extended to both workforce and local community;
- Child labour;
- Noncompliance with labour laws;
- Poor conditions of service; and
- Discrimination and exclusion of women and other vulnerable groups.

The main procedures for the project labour management will focus on:

- Terms and Conditions of Employment
- Non-discrimination and Equal Opportunity for workers
- Workers organization
- Age of employment
- Occupation health and safety
- Contractor management
- Primary supply management
- Workers and Working condition-based Grievance Redress Mechanisms

The LMP includes detailed descriptions of how project related grievances will be resolved. The grievance redress mechanism shall contribute to the efficient running of the project activities as it shall assist to investigate complaints and provide a fair and speedy redress to affected parties. There will be specific procedures for addressing GBV/SEA/SH including confidential reporting with safe and ethical documentation of GBV cases guided by the SL GBV Referral Protocol. Multiple channels will be put in place for lodging a complaint in connection to GBV/SEA/SH.

The LMP includes labour monitoring mechanism that will track and keep records on key performance indicators to demonstrate the extent to which various aspects of the LMP has been implemented. The PIU at MoCI shall have oversight responsibility towards the implementation of the LMP.

## **1.0 INTRODUCTION**

This Labour Management Procedure (LMP) is intended to provide the framework to address the specific labour related risks and impacts that are anticipated to occur as a result of the implementation of the Liberia Investment, Finance, and Trade (LIFT) Project. This LMP sets out a formal system by which the Ministry of Commerce and Industry (MoCI), together with other stakeholders and sub project contractors, will manage labour related risks and implement mitigation measures that will avoid or reduce the significance of labour related impacts on workers, community health, safety and security. This LMP will further be updated into a plan by the Sub Project Contractors during implementation.

### **1.1 Purpose and Scope of the Labour Management Procedure (LPM)**

The LMP has been developed with the purpose of protecting the health, safety, rights and wellbeing of project workers who will be engaged during the implementation of the LIFT Project. It is also intended to promote equal opportunity and non-discrimination in the management of the workforce taking into consideration both national and international labour requirements including the World Bank's Standard on Labour and Working Conditions (Environment and Social Standard: ESS 2).

The scope of this LMP will cover all aspects of the project that will require the hiring of workforce to execute the project activities. It is applicable to all types of project workers, skilled and unskilled, and deals with all aspects relating to recruitment, labour and working conditions, remuneration, management of worker relationships and Occupational Health and Safety (OHS) as well as work-based grievance redress mechanisms. The LMP also includes measures related to the management of workers engaged by third parties or contractors and sub-contractors, and also the management of workforce-related risks within the supply chain.

### **1.2 Objectives of the LMP**

This LMP is developed taking into consideration ESS 2 which specifies the requirements for the management of labour and working conditions. The LMP seeks to achieve the following specific objectives;

- i. Promote safety, good health and employee welfare at work by:
  - Establishing a system to appropriately manage and protect the OHS and welfare of workers including both employees and contractors and others who may be exposed to the risks associated with the project activities;
  - Ensuring that employees understand their rights in relation to labour and working conditions;
  - Allowing employees to exercise their right to freedom of association and collective bargaining;

- Providing project workers avenues to raise concerns and seek information and receive feedback and any associated corrective action;
  - Preventing discrimination in hiring, remuneration, access to training, on the grounds of race, nationality or social origin, birth, religion, disability, gender, sexual orientation, union membership, political opinions and age and promote equal opportunities;
  - Managing disciplinary practices and grievances in a manner that treats those affected individuals with respect and dignity and without threat, abuse or ill-treatment; and
  - Banning the use or support of child, forced or compulsory labour in direct operations and in the supply chain of the Project.
- ii. Preventing Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) as well as Gender Based Violence (GBV) that may arise as a result of implementing activities or sub projects. Protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with World Bank ESS2 on Labour and Working Conditions) and migrant workers, contracted workers, and primary supply workers, as appropriate.
- iii. Supporting the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; and
- iv. Providing project workers with accessible means to raise workplace concerns.

This LMP applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers. The LMP is applicable, as per ESS2, to the Project in the following manner:

- People employed or engaged directly by the PIU to work specifically in relation to the Project;
- People employed or engaged by contractors to perform work related to the core function of the project, regardless of location; and
- People employed or engaged by the primary suppliers under this project

## **2.0 OVERVIEW OF THE LIBERIA INVESTMENT, FINANCE, AND TRADE (LIFT) PROJECT**

The development objective of the LIFT Project is to improve the investment climate, expand access to finance, and facilitate trade in Liberia. The project seeks to support the Jobs and Economic Transformation (JET) framework for Liberia and its two pillars which anchor the outcomes of the project: better market functioning and improved firm capabilities. In doing so, the project targets six of the ten-building blocks in this framework as a complement to other parallel activities under the Liberia Country Partnership Framework (CPF) supporting macroeconomic management, infrastructure services, employment policy and human capital.

The project takes account of the Government Recovery Program (GRP) that seeks to support otherwise viable growth-oriented private enterprises that were adversely impacted by the effects of the COVID-19 pandemic. As the mechanism for firm level support is structured, guardrails will be established to prevent adversely impacting financial discipline and commercial credit underwriting needed for a sustained recovery. At the same time, with various indicators highlighting access to finance as an issue, attention to expanding Digital Financial Services (DFS) is needed.

The project incorporates features, in its design of project activities, that seek to address the identified gaps between men and women with respect to their participation in economic activity in the country, especially around differential constraints and performance between women-owned and men-owned firms. These include the reforms to the business environment (e.g., registration, permits and access to finance), as well as activities to support Small and Medium Enterprises (SMEs) and entrepreneurs. The project will monitor the extent to which activities are contributing towards closing gender gaps by measuring, among other things: (i) the number of women-led Micro, Small, and Medium Enterprises (MSMEs) with a loan through the project; and (ii) the percentage of women that are covered by the credit registry.

The project components are described as follows:

### **Component 1. Trade and Investment-Enabling Environment**

As the lead Government agency for fostering and maintaining a conducive environment for trade, industry and investment, the Ministry of Commerce and Industry (MOCI) is uniquely situated in the nexus of regulatory and business services.

This component supports transformational improvements in Liberia's business environment by strengthening critical Government to Business (G2B) services covering international trade, business licensing and private investment. This component builds on, and complements, the extensive advisory work that has been carried out in recent years by International Finance Corporation (IFC) and others which will continue through the initial implementation stages of the project. Given the project's emphasis on institution building in a capacity-challenged

environment, the ongoing IFC Analytical Study (AS) is deemed critical in fostering complementary reforms, buttressing capacity building efforts and in key strategic areas, to support Government of Liberia (GoL) to rapidly implement the project's activities.

### ***C.1.1: Support for the National Single Window for Trade***

The program seeks to establish a National Single Window (NSW) for regulatory compliance and reflects GoL's transformational aspirations for Liberia's trade orientation. Therefore, the GOL has committed to further trade facilitation reform by considering various NSW solutions available on the market, including proprietary Public- Private Partnership (PPP) and open-source solutions. Based on the NSW option chosen by the Authorities, the project will support the design, purchase, and implementation of Liberia's NSW.

### ***C.1.2: Support for Automated Business Licensing***

The project joins an IFC analytical study operation to support a modern business registration process that incorporates business licensing. The objective of the project is to enable Liberia Business Registry (LBR) to eventually function as an effective, automated One-Stop-Shop (OSS) for businesses, and to use its regulatory function to provide a robust, information management system available to the policy makers, lenders and creditors, and potential business partners.

### ***C.1.3: Support for Private Investment***

The project will support Special Economic Zone (SEZ) development and other related priority investment work. The areas of specific support for private sector-led investment include the following: legal and regulatory support; operations manual; Investment Policy and Promotion (IPP) work; strategic review; operational support to the Inter-Ministerial Concessions Committee (IMCC)'s secretariat; and capacity building. support to the Business Climate Working Group and its secretariat; regulatory review of needed near-term business climate reforms; facilitation of Public-Private Dialogue (PPD) between the Government and the private sector.

## **Component 2. SME Access to Markets and Finance**

This component seeks to increase private sector capabilities, competitiveness, access to finance and climate co-benefit investments at the firm level, especially of women-led SMEs. This component aims to support the growth of formal firms with high potential to contribute to job creation and productivity growth in Liberia, creating a more dynamic and resilient private sector, as well as a more robust and sustainable entrepreneurship SME support ecosystem. It aims to create a sustainable platform around entrepreneurship by: (i) launching a program delivering technical assistance (soft and hard skills training, tailored advice); (ii) the strengthening of business development services (BDS) offerings as well as institutional strengthening of the Small Business Administration (SBA), the main government agency coordinating SME policies and support; (iii) improving access to finance through capacity building of financial institutions to better serve underserved SMEs and a line of credit.

Particular attention will be paid to firms making their production process more sustainable, go ‘green’ and address the needs of women-led SMEs.

### ***C.2.1: SME Access to Markets***

The project will finance Technical Assistance (TA) to upgrade the capabilities of SMEs operating in supply chains/clusters to meet the purchasing needs of larger buyers. A private consulting firm with international experience and strong knowledge of the Liberian market will be hired through a competitive process to administer the TA. Eligible supply chains include all productive sectors that can generate high job multipliers and SME increase in sales from invested resources, with an initial focus on agriculture/agro-processing, light manufacturing, and logistics services. Supply chains/clusters in the sectors of mining, fisheries, forestry, tourism, and tradeable digital services will also be considered. The Bank is currently working with MOCI to ensure that the optimal sectors/clusters are chosen for support; two trust funds (infoDEV, C-JET) and the US\$4 million TA money will inform national priorities with firm-level potential. In addition, the Government has already hired a firm to assist with this initial screening work. It is expected that the TA will pay for skills upgrading and training.

### ***C.2.2: SME Line of Credit***

The project will fund a line of credit (LOC) for on-lending to participating financial institutions (PFIs) for loans to SMEs. The TA of Component 2.1 will be designed to ‘graduate’ SMEs to become more eligible for financing through the LOC facility. CBL will provide oversight of the FIs in this sub-component. US\$1 million in TA will also support this sub-component to help reach the project objectives. Given the reluctance of FIs to lend to SMEs in Liberia due to several factors including a lack of long-term local currency liquidity and deficiencies in SME capabilities, the LOC and TA, along with the firm capability's component (2.1 above), will provide critical access to finance for SMEs.

## **Component 3: Digital Financial Services Infrastructure**

Digital Financial Services (DFS) help governments quickly and securely reach people with cash transfers and reach businesses with emergency liquidity. It allows people to transfer and receive funds and to pay bills from their home, or in a market or store setting, with limited physical contact. Limited physical networks of access points including nascent agent banking and digital access points, contribute to reduced financial access and limited uptake and usage of DFS. Interoperability between payment systems, and the expansion of commercially viable agent networks and digital access points into rural areas play an essential role in building DFS at scale by getting more people to use and become familiar with DFS products. Support for the country’s financial infrastructure/DFS include support for two critical items: (i) the national electronic payments switch (NEPS); and (ii) an update of the credit registry. While the NEPS activities are expected to primarily help advance financial inclusion of individuals and micro-enterprises, the modern credit registry is expected to benefit individuals as well as SMEs.

### ***C.3.1: National Electronic Payments Switch (NEPS)***

This sub-component will facilitate the operationalization and implementation of the NEPS in line with the findings of the NEPS assessment requested by CBL and already provided by the World Bank Group (WBG).

### ***C.3.2: Credit Registry***

This sub-component aims to facilitate the establishment and operationalization of a modern credit reference system covering individuals and firms through a combination of TA and investments.

### **Component 4. Project Implementation, M&E and CERC**

This component will support: (i) Government and other actors capacity strengthening for coordination, design, and implementation; (ii) the administrative, technical, procurement of goods and services, and financial management of the project by the Project Coordination Unit (PIU) under the oversight of Project Steering Committee; (iii) the coordination among all institutional partners to ensure the efficient flow of information among all actors and coordination with the private sector; (iv) the establishment of monitoring and evaluation (M&E) mechanism of the project's results and impact; (v) the development of communication activities to publicize and disseminate project results, best practices, and success stories; (vi) impact evaluations. Communications, citizen engagement, and stakeholder coordination activities during the project will also be financed by this sub-component and managed by the PIU.

### **3.0 ANTICIPATED LABOUR USE FOR THE PROJECT**

#### **3.1 Number of Project Workers**

The precise number of contracted workers who will be employed are not known as of now. This will become known as and when implementation begins. The total number of direct workers are employees of the MOCI and therefore dedicated to this project. These are persons hired under the Project Implementation Unit (PIU) to ensure the successful implementation of the project. All other workers to be involved in the project from the other institutions will not be classified as direct workers.

For Civil Works Contractors and Workers, the project will support subproject investments to rehabilitate/ renovate existing structures in Monrovia to house heavy and sensitive electronic equipment. The number of workers (artisans, casual labourers) to be associated with the renovation works is not known but not expected to be more than thirty (30).

#### **3.2 Characteristics of Project Workers**

Given the nature of the project workforce (mostly unskilled and semiskilled construction labour) and characteristics of the labour force market in Liberia, it is likely the workforce, especially the lower-skilled workers, will be predominantly male. Female workers are expected in the PIU. The expectation is that the majority of labour will be locally hired with the exception of a few skilled workers. The project will encourage the training and hiring of as many local people from the neighbouring community as possible where the activities may take place.

Workers may be categorized into direct workers, contract workers, community workers and primary supply workers in accordance with ESS 2. This section includes project worker definitions of all workers (both governmental and contractors, etc., who will work or provide services during construction and operational phases of the project.

##### **3.2.1 Direct Project Workers (Government workers)**

The project will be implemented by the Ministry of Commerce and Industry and other implementing ministries will include Ministry of Finance and Development Planning. These will provide direct workers to be drawn also from such implementing agencies such as the Small Business Administration (SBA). These are also public and civil servants who are involved in the implementation of other national development projects.

Direct workers may also be deployed as ‘technical consultants’ by the project and will be governed by mutually agreed contracts. The direct workers will generally be required full time and all year round for the project duration.

### **3.2.2 Contracted Workers**

Contracted workers are expected from non-government organizations (NGOs) who will provide local government capacity building, as well as implementation support services to the Project. Contract workers will be employed as deemed appropriate by contractors, sub-contractors and other intermediaries. The details of such agreements will be known as and when activities implementation begin. Civil works contract workers will be required as needed. So, it will be up to the contractor to mobilize the labour force to match the type of work and the contract duration.

### **3.2.3 Foreign Workers**

The project does not expect to hire foreign workers as part of its implementation. The project shall require the contractors to engage workers from the locality of the project's impact area. However, where skilled workers are not available in the locality, it is expected that workers from nearby communities or other parts of the country or other country in case of expatriate labour will be involved in both construction and operation phases of the project.

### **3.2.4 Women Workers and Marginalized Workers**

Even though the project anticipates fewer women employees on the civil and other construction related jobs, the MoCI will endeavor to employ as many as possible women into the project. The project will also make conscious efforts to recruit other marginalized and vulnerable segments of the population into the project. It is recommended that efforts be made to achieve at least a 20 percent marginalized worker ratio of the total workforce of the project by encouraging the PIU and other contractors to reserve certain jobs identified for persons with disabilities to ensure inclusive labour management processes.

### **3.2.5 Primary supply workers**

Primary supply workers are individual and groups who will be employed by formal businesses who are required to supply procured materials and/or produce materials to the project based on agreed procurement standards. As part of the environmental and social assessment, any new supplier will be vetted regarding compliance with taxes, certification, licensing, and Public Liability Certificate. In recruitment policy, consideration of primary suppliers will also be attached to meeting the relevant requirements of this LMP including identifying potential risks of child labour to ensure that all workers are at least 18 years old. Issues of forced labour and safety which may arise in relation to primary suppliers will also be monitored and avoided in both construction and operation phases of the project.

Where there is a significant risk of child labour or forced labour related to primary supply workers, the Government of Liberia through the MoCI will require the primary supplier to identify those risks. The labour management procedures will set out roles and responsibilities for monitoring primary suppliers. If child labour or forced labour cases are identified, the MoCI will require the primary supplier to take appropriate steps to remedy them. Furthermore, where there is a significant risk of serious safety issues related to primary supply workers, the MOCI will require the relevant primary supplier to introduce procedures and mitigation measures to

address such safety issues. Such procedures and mitigation measures will be reviewed periodically to ascertain their effectiveness.

### **3.2.6 Community Workers**

The project facilities will be located in Monrovia and therefore community involvement in construction work and other such activities is not foreseen. Community members are therefore not expected to be employed as community labour.

#### 4.0 POTENTIAL LABOUR RISKS

Given the small-scale investments, no major labour risks are envisaged. Typical interventions expected from the project are summarized in the table below:

**Table 1. Summary of proposed project interventions**

No.	Project Component	Description	Type of proposed investment/ sub- projects
1.	C1	Business climate reforms and capacity building	<ul style="list-style-type: none"> <li>Provision of electronic hardware, e.g., computers, scanners, servers to the SEZ Authority</li> </ul>
2.	C 2	SME Support	<ul style="list-style-type: none"> <li>Small equipment purchases and usage, e.g., packaging tools</li> <li>Minimum civil works, e.g., rehabilitation of sheds, storage rooms, etc.</li> <li>Operations of SMEs (agriculture, agro-processing, light manufacturing, logistics service. Supply chain/ clusters in the mining, fisheries, forestry, tourism and tradable digital services)</li> </ul>
3.	C3	Financial Infrastructure	<ul style="list-style-type: none"> <li>Provision of electronic software and hardware</li> <li>Refurbishment of store room for electronic hardware equipment</li> <li>Screening of SMEs for their capacity to carry out E&amp;S actions</li> </ul>

From the anticipated project activities, potential labour risks have been identified which must be monitored closely by the PIU and project contractors during project implementation to avoid any escalation. These are summarized in Table 2 below.

**Table 2: Potential Labour Risks and Mitigation Measures**

S/No.	Potential Labour Risk	Mitigation Measures
1.	Occupational risks and hazards (incidents and accidents)	<ul style="list-style-type: none"> <li>Ensure full compliance with the OHS Management plan</li> <li>Provide regular OHS training to staff</li> <li>Ensure appropriate use of PPE</li> <li>Put appropriate safety warning signs</li> <li>Develop Standard Operating Procedures (SOPs) for all major tasks</li> </ul>

S/No.	Potential Labour Risk	Mitigation Measures
2.	Risk of Contracting COVID-19	<ul style="list-style-type: none"> <li>• Continue to raise awareness on COVID-19 best practices for construction sites to workers</li> <li>• Use shift system to decongest workers from highly congested areas/ rooms</li> <li>• Enforce national COVID-19 protocols are adhered to</li> <li>• Provide appropriate nose masks and PPEs</li> <li>• Encourage vaccination of all staff</li> </ul>
3.	Gender-Based Violence (GBV)	<ul style="list-style-type: none"> <li>• Hire more local labour</li> <li>• Sensitize workforce and community on the GBV action plan and implement it</li> <li>• Provide robust grievance redress mechanism for GBV/SEA/SH risks management</li> </ul>
4.	Risk of contracting HIV and AIDS and other STIs; risk extended to both workforce and the local community	<ul style="list-style-type: none"> <li>• Continuous awareness about HIV and AIDS and other STIs</li> <li>• Provide condoms for workers</li> <li>• Provide flexible shift system to enable workers visit their spouses regularly</li> <li>• Provide Information, Education and Communication materials to workers</li> </ul>
5.	Child labour	<ul style="list-style-type: none"> <li>• Sensitize workers and surrounding communities on issues of child marriage</li> <li>• Restrict under-aged from doing business on the project site</li> <li>• Restrict workers from buying merchandise from children</li> <li>• Put in place and make known reporting mechanisms for child marriage</li> <li>• Strengthen pre-employment screening systems to prevent hiring of children</li> <li>• Routine monitoring of project sites to confirm no underage is hired and involved in the work on the project site</li> </ul>
6.	Noncompliance with labour laws	<ul style="list-style-type: none"> <li>• Intensive monitoring to ensure compliance to labour laws</li> <li>• Include clauses in contracts to ensure contractors comply with labour laws</li> </ul>
7.	Poor conditions of service	<ul style="list-style-type: none"> <li>• Specify conditions of service to all workers in their contracts</li> <li>• Ensure contractors implement conditions of services of workers.</li> <li>• Ensure non-discrimination of workers</li> </ul>

S/No.	Potential Labour Risk	Mitigation Measures
8.	Discrimination and exclusion of Women and other vulnerable groups	<ul style="list-style-type: none"> <li>• Development of Grievance Redress Mechanism (GRM)</li> <li>• Implement a deliberate policy for gender equality.</li> <li>• Develop deliberate mechanisms to monitor participation of vulnerable groups in all activities</li> </ul>
	Labor influx	<ul style="list-style-type: none"> <li>• Reduce labor influx by hiring more local labor</li> <li>• Provide systems to ensure equal opportunity for all regardless of gender, ethnic and social status.</li> </ul>

## **5.0 OVERVIEW OF LABOUR POLICY AND LEGISLATION**

### **5.1 Legislation on Terms and Conditions of Work**

#### *Constitution of the Republic of Liberia*

The 1986 Constitution is the main legal framework which provides for the rights, equal treatment, and protection of all Liberian citizens and those residing within the borders of Liberia. It ensures that no citizen is discriminated against on the basis of sex, age, ethnic background, religious belief, political affiliation, social and economic status.

Article 8. The Republic shall direct its policy towards ensuring for all citizens without discrimination, opportunities for employment and livelihood under just and humane conditions, and towards promoting safety, health and welfare facilities in employment.

Article 18. All Liberian citizens shall have equal opportunity for work and employment regardless of sex, creed, religion, ethnic background, place of origin or political affiliation, and all shall be entitled to equal pay for equal work.

#### *Labour Laws of Liberia*

The law provides the conditions within which labour contracts shall be mutually agreed upon by employer and employee, and every contract of employment, whether written or oral, express or implied, shall comply with the requirements of the law.

#### *Decent Work Act, 2015*

The Decent Work Act, 2015 of the Republic Liberia, provides the legislative framework and law governing all aspects of labour and working conditions, which covers the contract of employment, terms and condition, remuneration, and occupational health and safety, trade unions and labour authorities. The provisions of law apply to all employers and employees that will be associated with the project. The Labour Code is broadly consistent with the ESS2.

The guiding principles reside on the prohibition of forced labour, discrimination, equal pay for equal works, as well as, remedies for infringements of rights. The Act makes it mandatory for employers to furnish employees with written particulars of employment, stating hours of work, wages, leave entitlements, job description, grievance procedures, and benefits if any among others.

Specifically, Chapter 17 deals with the matter of hours of work and continuity of employment and will apply to the risk of extended hours of work as perceived as a minor risk to the project. Part V speaks to Protection and Regulation of wages, Chapter 18, Section 18.1 - Leave

entitlements and other benefits and Chapter 14, Section 14.2 termination of employment in general.

The Employment Act of Liberia strictly prohibits discrimination of employees based on race colour, national extraction, ethnicity, social origin, religion, political opinion, sex, marital status, family responsibilities or disability. An employee also has the right, by law, to remove himself or herself from a work situation which he or she reasonably believes presents an imminent or serious danger to life or health.

Below is the summary of relevant provisions of the Decent Work Act, 2015

## **2.2 Freedom from forced or compulsory labour**

- a) No person in Liberia shall be subjected to forced or compulsory labour, provided however that this does not prohibit work or service:
  - i. exacted in consequence of compulsory military service laws of general application, provided that the work or service in question is of a purely military character;
  - ii. which forms part of the normal civic obligations of a citizen;
  - iii. exacted as a consequence of a conviction in a court of law, provided that:
    - it is carried out under the supervision and control of a public authority; and
    - no person is hired to or placed at the disposal of private individuals, companies or associations; exacted in cases of emergency, that is to say, in the event of war or of a calamity or threatened calamity, such as fire, flood, famine, earthquake, violent epidemic or epizootic diseases, invasion by animal, insect or vegetable pests, and in general any circumstance that would endanger the existence or the well-being of the whole or part of the population; or
  - iv. which is in the nature of minor communal services of a kind which, being performed by the members of the community in the direct interest of the said community, can therefore be considered as normal civic obligations incumbent upon the members of the community, provided that the members of the community or their direct representatives shall have the right to be consulted in regard to the need for such services.
  
- b) A person shall not directly or indirectly cause, permit or require any person to perform forced labour.

## **2.3 Freedom from the worst forms of child labour**

- a) Except as elsewhere provided in this Act, no person shall employ or cause a child to be employed.
- b) Without limiting the scope of the preceding provision, the following forms of work by children are absolutely prohibited:

- i. all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict;
  - ii. the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances;
  - iii. the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties; and
  - iv. Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or welfare of children.
- c) The Minister may make regulations which identify work prohibited under paragraph b) iv), and other forms of work for children that shall be absolutely prohibited.
  - d) A person shall not directly or indirectly cause, permit or require a child to participate in a form of work which is absolutely prohibited by or pursuant to this section.

### **21.2 Minimum Age for Employment in Liberia**

No person shall employ or allow a child under the age of 15 years to be employed in full time employment.

### **21.3 Light work for children under the age of 15**

- a) A child who is at least 13 years old may be employed to perform light work, provided that they:
  - i. may only work for a maximum of two hours in a day and fourteen hours in a week; and
  - ii. are employed in compliance with any prescribed procedures.
- b) For the purposes of this Act, light work means work or any other activity that:
  - i. is not likely to be harmful to a child's health or safety, moral or material welfare or development; and
  - ii. is not such as to prejudice the child's attendance at school or their capacity to benefit from instruction.

### **21.4 Types of hazardous work that are prohibited for children**

- a) The following types of work are prohibited for children:
  - i. work which exposes children to physical, psychological or sexual abuse;
  - ii. work underground, under water, at dangerous heights or in confined spaces;
  - iii. work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads;
  - iv. work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health; or
  - v. work under particularly difficult conditions such as work for long hours or during the night, or work where the child is unreasonably confined to the premises of the employer.

### **21.5 Particular working conditions for children over the age of 15**

- b) A child who has not yet attained the age of 16 years may not be employed for more than 7 hours in any day, or for more than 42 hours in any working week.
- c) Daily hours of work for children shall include one or more rest periods totalling at least one hour, with rest periods so arranged that a child does not work for more than four consecutive hours.
- d) Children shall be entitled to annual leave in accordance with Part Three of this Chapter, and in addition to a further period of annual leave equivalent to the number of working days in one (1) week.
- e) An employer shall keep a register of all employed children, which shall clearly show their names, and also their ages and their dates of birth, duly certified wherever possible. An employer shall keep the records required under this section throughout the
- f) employment of any child, and for a period of five years following the termination of their employment.

### **2.4 Equal Protection**

- a) All women and men are entitled, without distinction, exclusion or preference to enjoy and to exercise the rights and protections provided in this Act.
- b) Without limiting the scope of the preceding provision, all persons who work or who seek to work in Liberia are entitled to enjoy and to exercise the rights and protections conferred by this Act irrespective of:
  - i. race, tribe, indigenous group, language, colour, descent, national, social or ethnic extraction or origin, economic status, community or occupation;
  - ii. immigrant or temporary resident status;
  - iii. sex, gender identity or sexual orientation;
  - iv. marital status or family responsibilities;
  - v. Previous, current or future pregnancy or breastfeeding;
  - vi. age;
  - vii. Creed, religion or religious belief;
  - viii. Political affiliation or opinion, or ideological conviction; ix) physical or mental disability;
  - ix. health status including HIV or AIDS status, whether actual or perceived; xi) irrelevant criminal record, acquittal of a crime or dismissal of a criminal prosecution against them; or
  - x. personal association with someone possessing or perceived to possess one or more of these attributes.

### **2.5 Right to Equal Remuneration**

- a) All women and men are entitled, without distinction, exclusion or preference, to receive equal remuneration for work of equal or comparable value.
- b) Equal remuneration refers to rates of remuneration established without discrimination based on sex.

## **2.6 Rights to Form Organizations and to Bargain Collectively**

- a) All employers and workers in Liberia, without distinction whatsoever, may establish and join organizations of their own choosing, without prior authorization, and subject only to the rules of the organization concerned.
- b) Subject to this Act:
  - i. an organization of employers or workers may draw up its own constitutions and rules, elect its representatives in full freedom, and formulate its own programme of lawful activities; and
  - ii. employers and workers and their organizations may: (1) bargain collectively; and (2) engage in strike or lockout action in accordance with Chapter Forty-One.

## **2.7 Prohibition of Discrimination**

- a) No person shall discriminate against a person who works or who seeks to work in Liberia in an employment practice.
- b) No person shall discriminate against another in an employment practice because the person has exercised or attempted to exercise any of their rights in this Act.
- c) Discriminate means to apply any distinction, exclusion or preference which has the effect, whether directly or indirectly, of nullifying or impairing equality of opportunity or treatment, including the provision of remuneration or other benefits:
  - i. on a ground identified in section § 2.4; or
  - ii. because a person has exercised or sought to exercise, or is entitled to the enjoyment of any right conferred by this Act.
- d) It is not unlawful by virtue of this section:
  - i. to distinguish, exclude or prefer any individual: (1) on the basis of an inherent requirement of a particular job; or (2) in the course of implementing affirmative action measures consistent with the purposes of this Act;
  - ii. in the case of an employee who is pregnant, temporarily to reassign her to different duties or functions that are suitable to her pregnant condition, provided that the reassignment does not lead to reduction in remuneration or any other benefits in respect of her employment.
- e) Affirmative action measures means measures to redress the disadvantages in employment experienced by persons, or groups, or categories of persons, in order to ensure their equitable representation in all occupational categories and levels in the workforce.

## **2.8 Prohibition of sexual harassment**

- a) A person shall not directly or indirectly sexually harass a worker:
  - i. in any employment practice; or
  - ii. in the course of a person's employment.
- b) Sexual harassment means:

- i. sexual conduct, which is unwelcome, unreasonable, or offensive to the recipient, and which occurs in circumstances where a person's rejection of, or submission to, such conduct is used explicitly or implicitly as a basis for a decision which affects that person's job; or
  - ii. sexual conduct that creates an intimidating, hostile or humiliating working environment for the person that is subject to that conduct.
- c) Sexual conduct means: i) conduct of a sexual nature, whether physical, verbal or non-verbal; or ii) conduct based on sex affecting the dignity of women or men.

## **5.2 Legislation on Occupational Health and Safety**

### **Labour Law of Liberia on Workmen's Compensation**

Chapter 36 of the Labour Law of Liberia on Workmen's Compensation among others provides (a) that every person in Liberia who works for a living shall be entitled to maintain his independence and self-respect through self-support even when physically handicapped by injury or disease; (b) that an employee who suffers injury or disease as a consequence of his employment shall be entitled to compensation during his disability and to the extent of this disability as a right arising out of his employment; and (c) that the rehabilitation of an employee who suffers an occupational injury or disease shall be the joint obligation of his employer, the employee himself; and the government, according to the capacity of each.

### **Decent Work Act, 2015**

The Liberia Decent Work Act, 2015 set out framework for promoting occupation health and safety at work places. Below is the outline of some key provisions on occupational health and safety:

#### **25.1 General duties of employers**

- a) Every employer shall ensure so far as is reasonably practicable the safety and health at work of all workers they have engaged.
- b) Without limiting the scope of the preceding provisions, an employer contravenes their obligation under this section by failing:
  - i. to provide and maintain plant and systems of work that are safe and 70 without risks to health;
  - ii. to make arrangements for ensuring safety and absence of risks to health in connection with the use or operation, handling, storage or transport of plant and substances;
  - iii. to provide, in appropriate languages, such information, instruction, training and supervision as may be necessary to ensure the safety and health of workers they have engaged and to take such steps as are necessary to make available in connection with the use at work of any plant or substance adequate information in appropriate languages:

- about the use for which the plant is designed and about any conditions necessary to ensure that, when put to that use, the plant will be safe and without risks to health; or
  - about any research, or the results of any relevant tests which have been carried out, on or in connection with the substance and about any conditions necessary to ensure that the substance will be safe and without risks to health when properly used;
- iv. as regards any workplace under the employer's control to maintain it in a condition that is safe and without risks to health; or
  - v. as regards any workplace under the employer's control to provide and maintain means of access to and egress from it that are safe and without any such risks; and
  - vi. to provide and maintain a working environment for workers they have engaged that is safe and without risks to health, and adequate as regards facilities for their welfare at work.
- c) For the purposes of this section, any plant or substance is not to be regarded as properly used by a person where it is used without regard to any relevant information or advice relating to its use, which has been made available by the person's employer.

## **25.2 Duty of employer to formulate safety and health policy**

- a) It shall be the duty of every employer or self-employed person to develop, as appropriate in consultation with workers of the employer, and with such other persons as the employer considers necessary, a policy relating to occupational safety and health.
- b) The policy shall enable effective cooperation between the employer and the workers in promoting and developing measures to ensure the workers' safety and health and the organization and arrangements for the time being in force for carrying out that policy.

Other key national policies and labour legislation with regards to occupational health and safety include:

### ***The Public Health Law – Title 33 of the Liberian Code of Law Revised of 1976***

This Act provides comprehensive legislation on matters relating to public health, including control of diseases, environmental sanitation and regulation of health issues.

***The National Health Policy and Plan 2011*** builds on the 2007 version of the National Health Policy, the 2008 Governance Commission Report, the 2009 National Decentralization Policy, the 2009 National Social Welfare Policy as well as the 2011 Country Situational Analysis Report.

**The Employment Policy, 2009** refers to the Liberian Poverty Reduction Strategy (LPRS) which provides the framework for addressing poverty. The LPRS prioritises (1) enhancing peace and security, (2) revitalizing the economy, (3) strengthening governance and the rule of law, and (4) rehabilitating infrastructure and delivering basic needs.

Productive and decent employment is a core element of each of these four strategic areas.. The Policy seeks to address the question of how more and better jobs can be created. A two-prong approach is suggested including emergency employment on the one hand and on the other actions geared towards generating medium term sustainable jobs.

### **5.3 International Laws and Conventions**

A total of 25 of International Labour Organization (ILO) Conventions have been ratified by Liberia.

- i. Fundamental Conventions: 6 of 8
- ii. Governance Conventions (Priority): 2 of 4
- iii. Technical Conventions: 17 of 178

### **5.4 Environment and Social Standards (ESS2): Labour and Working Conditions**

The World Bank Environment and Social Standard 2: Labour and Working Conditions (ESS2) recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. It requires projects to promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. ESS2 seeks to ensure a safe, healthy conducive working environment for workers and ensure that the working environment is non-discriminatory, free of forced and child labour as well as other forms of intimidation and harassment. ESS2 also ensures that workers have channels for grievance redress, freedom of association and access to collective bargaining rights as prescribed by national law.

Even though the Constitution of Liberia and other national laws such as the Decent Work Act of 2015 seek to promote the labour and working conditions of employees, there will still be need to provide capacity training on ESS2 and the new ESF so that project staff and other stakeholders involved in the project will be well equipped with the required skills and knowledge to manage the project Environment and Social (E&S) activities in accordance with ESS2 and other relevant standards and national laws.

## 6.0 RESPONSIBILITIES

The PIU will oversee and guide all the workers associated with the project. The PIU will be responsible for the following:

- i. implement this labour management procedure;
- ii. ensure that civil works contractors comply with these labour management procedures, and also prepare occupational health and safety plans before starting work;
- iii. ensure the contracts with the contractors are developed in line with the provisions of this LMP and the project's ESMF, as detailed in the Project Operations Manual;
- iv. monitor to verify that contractors are meeting labour and OHS obligations toward contracted and subcontracted workers as required by Liberian law and respective contracts between the Ministry of Commerce and Industry and the contractors;
- v. monitor contractors and subcontractors' implementation of labour management procedures;
- vi. monitor compliance with occupational health and safety standards at all workplaces in line with Liberian occupational safety and health legislation;
- vii. monitor and implement training on LMP and OHS for project workers;
- viii. ensure that the grievance redress mechanism for project workers is established and implemented and that workers are informed of its purpose and how to use it;
- ix. Monitor how the GRM is working including what are the most common complaints, and how successful the GRM is in resolving these;
- x. have a system for regular monitoring and reporting on labour and occupational safety and health performance; and
- xi. monitor implementation of the Worker Code of Conduct include clause on Sexual Exploitation and Abuse/Sexual Harassment.

The Project Operating Manual (POM) will include standard templates of contracts which include LMP, OHS aspects, and the civil contractors' commitment to them. LMP and OHS responsibilities of the Contractors include the following:

- i. Follow the labour management procedures and occupational health and safety requirements in line with the ESMF provisions and stated in the contracts signed with Implementing Agency. If the number of workers (direct plus contracted) is above 50, then Contractors will develop their own LMPs and OHS plans.
- ii. Supervise the subcontractors' implementation of labour management procedures and occupational health and safety requirements.
- iii. Maintain records of recruitment and employment of contracted workers as provided in their contracts.
- iv. Communicate clearly job descriptions and employment conditions to all workers.
- v. Make sure every project worker hired by contractor/subcontractor is aware of the PIU dedicated phone number, email address, and web portal through which anyone

can submit grievances and structure of worker Grievance Redress Mechanism (GRM).

- vi. Provide induction (including social induction) and regular training/briefing to employees in labour protection requirements, including training on their rights on safe labour under Liberian law, on the risks of their jobs, and on measures to reduce risks to the acceptable levels
- vii. In collaboration with PIU Social Safeguard Specialists and contractor's manager, conduct training on labour management procedures and occupational safety to manage subcontractor performance.
- viii. Ensure that all contractor and subcontractor workers understand and sign the Code of Conduct prior to the commencement of works and supervise compliance with the Code.

The Financial Intermediaries (FIs) will implement this labour management procedure and further

- i. liaise with the PIU to ensure the contracts with the credit line beneficiaries are developed in line with the provisions of this LMP and the project's ESMF, as detailed in the Project Operations Manual;
- ii. ensure compliance with occupational health and safety standards at all workplaces in line with Liberian occupational safety and health legislation;
- iii. ensure that the grievance redress mechanism for project workers is established and implemented and that workers are informed of its purpose and how to use it;
- iv. have a system for regular monitoring and reporting on labour and occupational safety and health performance; and
- v. implement the Worker Code of Conduct include clause on Sexual Exploitation and Abuse/Sexual Harassment.

The credit line beneficiaries will implement the labour management procedure which will include:

- i. ensuring compliance with these labour management procedures, and also prepare occupational health and safety plans before starting work;
- ii. meeting labour and OHS obligations toward contracted and subcontracted workers as required by Liberian law and respective contracts between the Ministry of Commerce and Industry and the contractors;
- iii. compliance with occupational health and safety standards at all workplaces in line with Liberian occupational safety and health legislation;
- iv. ensuring that the grievance redress mechanism for project workers is established and implemented and that workers are informed of its purpose and how to use it;
- v. have a system for regular monitoring and reporting on labour and occupational safety and health performance; and
- vi. implementation of the Worker Code of Conduct to include clause on Sexual Exploitation and Abuse/Sexual Harassment.

## **7.0 PROCEDURES FOR LABOUR MANAGEMENT**

### **7.1 Terms and Conditions of Employment**

The Project Implementation Agency will ensure that:

- i. Workers work for 8 hours a day from 8.00 am to 5.00 pm with an hour break six days a week.
- ii. The Conditions of Service and collective bargaining agreements for construction and related workers including artisans, watchmen and waste handlers are in line with the provisions of the constitution and other labour laws.
- iii. Wages negotiated every three years as stipulated in the labour laws.
- iv. Sub Project Contractors and Sub-Contractors provide and sign written employment contracts for all workers upon hiring.
  - v. All contracts are vetted and approved by the Ministry of Labour and Social Security.
  - vi. Sub Project Contractors inform hired workers of all employment related information and ensure that the workers understand the rights and obligations of both parties under the contract.
- vii. Workers know the standards of conduct expected of them. A written policy manual (Code of Conduct) specifying the rules and procedures will be issued and made readily available to all workers as part of the labour contract. The Code of Conduct will be explained to workers who are not literate in English in a Language they understand.
- viii. Employees of Sub Project Contractors, Sub Contractors, Consultants and Primary Suppliers (skilled and unskilled or casual labour) are paid living wages which are not be below the current minimum wage.

### **7.2 Non-discrimination and Equal Opportunity**

The MoCI and its implementing partners shall monitor discriminatory practices not only in hiring procedures but throughout all stages of employment. To avoid any discrimination;

- i. Sub Project Contractors and their Sub Contractors shall treat workers equally and fairly with respect to all policies, conditions and benefits of employment.
- ii. Sub-Project Contractors and their Sub Contractors must ensure that employment decisions are based on relevant and objective factors (merit, experience, tasks, skills, etc.), and that consistent procedures are followed in the decision-making processes.
- iii. The company/employer should also ensure that its workers and suppliers are aware of its policy on non-discrimination and equal treatment in order to promote a culture of respect and zero-tolerance for discrimination.
- iv. The contractors should ensure that adequate mechanisms are in place for workers to report on workplace discrimination, bullying or sexual harassment. These mechanisms

- should be able to promptly investigate all complaints and take appropriate preventive or disciplinary action.
- v. All workers must be informed of their rights and encouraged to use the mechanism without fear of reprisal. MoCI well as Sub Project Contractors and their Sub Contractors shall designate specific staff (e.g. a workers' representative) to act as the workers' focal point on employment discrimination issues. Workers should be able to report discriminatory incidents to the focal point on a confidential basis. At the same time, the focal point should possess adequate knowledge to advice workers on national laws and contractor/employer policies regarding non-discrimination and the various remedies available.

### **7.3 Workers Organization**

- i. MoCI, Consultants, as well as Sub Project Contractors and their Sub Contractors, must not attempt to influence the right of workers to organize or associate with any Trade Union;
- ii. The union workers must be allowed to have access to company/employer premises to carry out their responsibilities therein, as long as they exercise their duties in a reasonable and non-disruptive manner;
- iii. MoCI, Consultants as well as Sub Project Contractors and their Sub Contractors shall not intimidate or harass workers union due to their active participation in collective bargaining or strikes aimed at improving working conditions; and
- iv. MoCI, Consultants as well as Sub Project Contractors and their Sub Contractors must not refuse to recognize the elected representatives of the union members. Thus, the elected representatives of the unionized workers but be recognized and engaged during collective bargaining and other deliberations that border on employee and staff welfare.

### **7.4 Age of Employment**

According to international law, children are entitled to the basic right to education and must not be hired to work (especially hazardous work such as civil works and work. in health care facilities). Therefore,

- i. The minimum age for project workers under the Project will be 18 years.
- ii. No child under the age of 18 years shall be employed either directly or indirectly to work on the project.
- iii. MoCI together with the supervising Consultants must institute a verification system where every worker must have their age verified by a recognized community/opinion leader in addition to presenting a national identity card as a precondition for employment or birth certificate where available prior to employment.
- iv. MoCI Social Safeguards Specialist shall routinely undertake spot checks for issues of child labour.

- v. Where there is any reasonable doubt as to the age of the applicant, requesting and reviewing available documents to verify age (such as a birth certificate, national identification card, medical or school record, or chiefdom tax receipt).
- vi. Person under 18 years found on site or working within the Project will be summarily removed out of the site and sent to the PIU for redress.
- vii. Work on a site involving minors (less than 18 year) will be suspended and Sub Project Contractor will report to the police for investigations and necessary action.
- viii. MoCI and Sub Project Contractors shall be required to undertake a child labour risk assessment for each sub project and activity following the under listed steps:
  - Identify communities and persons vulnerable to child labour risks as well as hazardous activities to children/minors through consultation with relevant Ministries, Non-Governmental Organizations (NGOs) and Community Based Organizations (CBOs) in the Sub Project Catchment, review national legislations and ESS2 requirement on child and forced labour.
  - Evaluate and prioritize risks.
  - Decide on action to prevent or control the identified risks.
  - Put in place the preventive and control measures through a prioritization plan.
  - Monitoring, reviewing and updating the established preventive and control measures daily.
- ix. MoCI, Sub Project Contractors and their Sub Contractors shall create and keep separate record of all project workers

## **7.5 Occupational Health and Safety**

- i. Sub project contractors must provide safe and healthy working facilities and take appropriate precautionary measures to protect workers from anticipated dangers in the workplace.
- ii. They must also have a pre-established action plan designed to respond effectively to workplace accidents and health hazards in the event that all precautions fail.
- iii. The contractor must consult employees and their representatives on health and safety matters in the workplace. Employees must be given adequate information regarding health and safety matters and asked to contribute their input on such issues as the alteration of workplace processes, occupational safety, and the organization of work.
- iv. No employee will be punished for removing him/herself from a working environment that he or she reasonably perceives to be dangerous or harmful.
- v. Employees of MoCI, Sub Project Contractors and Sub-Contractors as well as Project Consultants shall be provided with orientation/training on GBV/SEA/SH and health and safety. OHS training/orientation will be provided prior to beginning a new assignment. All workers will be required to avail themselves for OHS training and subsequent toolbox meetings.
- vi. Sub project contractor/employers/ MoCI must also ensure that workers are fully updated and capable of carrying out their work tasks safely.

- vii. Workers must be provided with the appropriate Personal Protective Equipment (PPE) which must be worn at all time on site as well as during performing any task.
- viii. MoCI, Sub project Contractors and Suppliers shall ensure that regulations on the use of PPEs are enforced on site and within the working premises
- ix. Workers must be provided facilities such as canteens, toilets, first aid kits, potable water, hygiene and, WASH facilities including washing points (clean running water, soap and paper towels) on site and within the work environment.
- x. Work plans and schedules should avoid crowding on site and within the premises while enforcing COVID-19 protocols e.g. social distancing at work and the use face masks to protect workers against COVID-19 and availability of sufficient sanitizer for workers at the workplace.
- xi. Sub Project Contractors and Sub-Contractors will be required to maintain proper housekeeping on site.
- xii. Facility Managers, Sub Project Contractors and Sub-Contractors shall be required to designate qualified management personnel to handle environmental, social, labour, occupational health and safety issues including grievance redress and enforce the Liberian laws on same as well as requirements of ESS2 and ESS4, site specific ESMPs, this LMP and other sub project safeguards instruments on site.

## **8.0 WORKERS GRIEVANCE REDRESS MECHANISM**

Workers must have the right to submit grievances regarding workplace concerns without the threat of adverse employment action or prejudice. Complaints may range from dissatisfaction with work hours and rest periods to claims of coercion, intimidation or abuse including GBV/SEA/SH. In order to facilitate the expression of these complaints:

- i. MoCI and Sub-Project Contractors must work with the workers or their representatives to establish and maintain an effective grievance mechanism through which workers can lodge complaints.
- ii. Workers' grievance and complaints boxes must be placed at vantage places where workers can log their complaints.
- iii. MoCI and Sub-Project Contractors shall inform all workers about the grievance mechanisms put in place during orientation sessions, toolbox meetings and using notice boards on site or within the premise of project sites.
- iv. The grievance mechanism should serve three key functions. First, it should serve as a focal point of communication across the organization where workers can report and receive advice on their concerns and grievances and from which concerns and grievances are channeled to management. Second, the mechanism should be mandated to identify remedies to be implemented through internal procedures in the form of corrective action, mediation, settlement or dispute resolution. Third, the mechanism should have the capacity to direct complainants or hand over cases to appropriate external mechanisms, including non-state and state-based mechanisms, such as courts, GBV Service Providers and the Family Support Unit of the Liberian Police Force, socio-psychological support units in the case of GBV/SEA/SH complaints.
- v. The internal grievance redress mechanism should not in any way prejudice the complainant's ability to seek recourse through external mechanisms.
- vi. MoCI and Sub-Project Contractors must examine all grievances pursuant to its pre-established grievance procedure.
- vii. Any worker filing a grievance must receive notice of the contractor/employer's findings regarding his or her particular complaint and whether corrective action will be taken.

The proposed structure for Grievance Redress Mechanisms under the project are discussed as follows:

### **8.1 Grievance redress mechanism for workers on site**

The grievance redress mechanism shall contribute a lot to the efficient running of the project activities as it shall assist to investigate complaints and bring up a much clearer version of the complaint at an earliest time possible, provide a fair and speedy means of dealing with complaints, prevent minor disagreements from developing into more serious disputes, thereby, providing a simple, speedy and without cost and effective mechanism of installing satisfaction to the ones those were affected.

### **8.1.1 Work related GRM stages**

The Workers grievance procedure will have five major stages. These stages include: (i) the complaint or grievance uptake (ii) Assessment, analysis and response (iii) Resolution and closure (iv) Registry and monitoring (v) GRM Evaluation.

#### *Stage 1: Complaint Uptake*

Employed workers will present their complaints or grievances to the Workers Grievance Redress Management Committee (WGRMC), at the actual project site. The WGRMC will record all received complaints or grievances in a workers' Log and Resolution form as attached in Annex 1. The case shall only be referred to Institutional Grievance Redress Management Committee (IGRMC) when it has not been resolved at WGRMC. One committee member from the workers will undertake the responsibility to ensure the cases are followed up and feedback is provided.

#### *Stage 2: Assessment, Analysis and Response*

When a complaint is received, a maximum of 5 days has been set for the WGRMC to resolve the complaint or respond to the complainant. This is so to make sure that grievances/complaints are resolved as early as possible. Once a complaint is received, the WGRMC shall assess whether the complaint or grievance is relevant or not. In a situation where the complaints are not related to the project, complainant shall be advised to channel their complaints to the right institutions. If complaint is related to the project's worker concern, the WGRMC shall hear such cases and make necessary follow ups to gather evidence and make necessary determination. The outcome of the analysis shall be communicated to the complainant.

#### *Stage 3: Resolution and Closure*

Where a resolution has been arrived at and the complainant accepts the resolution, the complainant shall be required to sign the resolution and closure section in Workers Grievance Log and Resolution Form. The chairperson of the WGRMC shall also be required to counter sign. This shall signify that the complaint or grievance which was presented, has been fully discussed, resolved and closed.

#### *Stage 4: GRM Registry*

A register shall be kept at all levels of WGRM to ensure proper record of all complaints and their resolutions. For any case heard, closed or referred at the WGRMC, a copy of logs and resolution forms for every case shall be submitted to the MoCI and the PIU for records.

#### *Stage 5: GRM Evaluation*

The Workers GRM evaluation shall be undertaken alongside other evaluation exercise for the project and output of the evaluation shall be shared with the Project Management, MoCI and the Bank.

### **8.1.2 Grievance for Gender Based Violence (GBV) Issues**

There will be specific procedures for addressing GBV/SEA/SH including confidential reporting with safe and ethical documentation of GBV cases guided by the GBV Referral Protocol. Multiple channels will be put in place for lodging a complaint in connection to GBV/SEA/SH. Specific GRM considerations for addressing GBV/SEA/SH are:

- a separate GBV GRM system, potentially run by a GBV Services Provider or trained professionals with feedback to the project GRM, similar to that for parallel GRMs will be established. The GRM operators are to be trained on how to collect GBV/SEA/SH cases confidentially and empathetically (with no judgment);
- The Project will establish multiple complaint channels, and these must be trusted by those who need to use them.
- No identifiable information on the survivor should be stored in the GRM logbook or GRM database.
- The GRM should not ask for, or record, information on more than three aspects related to the GBV/SEA/SH incident:
  - The nature of the complaint (what the complainant says in her/his own words without direct questioning);
  - If, to the best of complainant's knowledge, the perpetrator was associated with the project; and,
  - If possible, the age and sex of the survivor.

The GRM should assist survivors by referring them to GBV Services Provider(s) or the nearest one stop GBV center for support immediately after receiving a complaint directly from a survivor. This will be possible because a list of service providers and GBV risks management centers will be made available before project work commences as part of the mapping exercise. The information in the GRM must be confidential-especially when related to the identity of the complainant. For GBV, the GRM should primarily serve to: (i) refer complainants to the GBV Services Provider; and (ii) record resolution of the complaint.

#### *Data Sharing*

GBV Service Providers will have their own case management process which will be used to gather the necessary detailed data to support the complainant and facilitate resolution of the case referred by the GRM operator. The GBV Services Provider should enter into an information sharing protocol with the GRM Operator to close the case. This information should not go beyond the resolution of the incident, the date the incident was resolved, and that the case is closed. Service providers are under no obligation to provide case data to anyone without the survivor's consent. If the survivor consents to case data being shared the Service Provider can share information when and if doing so is safe, meaning the sharing of data will not put the survivor or Service Provider at risk for experiencing more violence or abuse. The GRM will have in place processes to immediately notify both the ministry and the World Bank of any GBV complaints with the consent of the survivor.

### **8.1.3 World Bank Grievance Redress System**

Communities and individuals who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the World Bank's GRS. The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the World Bank's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of World Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

## **9.0 MONITORING AND REPORTING**

### **9.1 Labour Management Procedure Monitoring**

A list of monitoring indicators, frequency of monitoring and responsible party/parties for monitoring are presented in Table 2 and 3 to guide the monitoring of the LMP. The indicators are not exhaustive and can be updated during the preparation of sub project safeguards instruments and during project implementation.

**Table 3: Monitoring Indicators- Construction/Implementation Phase**

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
<b>Occupational Health and Safety Issues</b>	<ul style="list-style-type: none"> <li>• Number, type, place and time of accidents/incidents</li> <li>• Number of workers receiving OHS and hygiene training provided for sub project contractors’ and sub-contractors employees.</li> <li>• Number and type of PPEs distributed by Sub Project Contractors and Sub-Contractors</li> <li>• Number of workers on site wearing the appropriate PPEs</li> <li>• Presence of Health and Safety Officer on Site or otherwise</li> <li>• Site workers level of compliance with OHS standards e.g. wearing of PPEs</li> <li>• Presence of First Aid Kits on site or otherwise</li> <li>• Presence of Fire Extinguishers on Site</li> <li>• Hoarding material</li> <li>• Presence of handwashing facilities and hand sanitizers on site or otherwise</li> </ul>	<ul style="list-style-type: none"> <li>• Monthly</li> </ul>	<ul style="list-style-type: none"> <li>• Site Visits</li> <li>• Sub Project Contractors Accident Records books</li> <li>• Accident/ Incident Reports</li> </ul>	<ul style="list-style-type: none"> <li>• MoCI Safeguards Unit</li> </ul>	<ul style="list-style-type: none"> <li>• Sub Project Consultant</li> <li>• Factory Inspectors</li> </ul>

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
	<ul style="list-style-type: none"> <li>• Suspected and confirmed COVID 19 cases on site</li> </ul>				
<b>Labour Related Issues</b>	<ul style="list-style-type: none"> <li>• Number of Sub Project Contractor and Sub-Contractor employees with formal Contracts</li> <li>• Presence of under aged workers (18 years and below) or otherwise</li> <li>• Number and type of employees recruited from the community by gender</li> <li>• Average monthly income of project workers and informal workers by gender</li> <li>• Working days and hours</li> <li>• Contractor and Sub-Contractor employees who have signed and understand the Code of Conduct</li> </ul>	<ul style="list-style-type: none"> <li>• Monthly</li> </ul>	<ul style="list-style-type: none"> <li>• Site Visits</li> <li>• Inspection of Employees Contracts</li> <li>• Random interview of project workers</li> </ul>	<ul style="list-style-type: none"> <li>• MoCI Safeguards Unit</li> </ul>	<ul style="list-style-type: none"> <li>• EPA</li> <li>• Sub Project Consultant</li> <li>• Factory Inspectors</li> </ul>
<b>Gender Based Violence, Sexual Exploitation and Abuse, and Sexual Harassment</b>	<ul style="list-style-type: none"> <li>• Uptake points of complaints</li> <li>• Number of SEA/SH/GBV cases reported by type</li> <li>• Number of SEA/SH/GBV cases under investigation by type</li> <li>• Number of cases under prosecution by type</li> <li>• Number of cases discharged by outcome</li> </ul>	<ul style="list-style-type: none"> <li>• Daily</li> </ul>	<ul style="list-style-type: none"> <li>• Grievance Redress Mechanism Platform</li> <li>• On Site Grievance Redress Register</li> </ul>	<ul style="list-style-type: none"> <li>• MoCI Safeguards Unit</li> </ul>	<ul style="list-style-type: none"> <li>• EPA</li> <li>• Sub Project Consultant</li> <li>• GBV Service Providers</li> <li>• Police</li> <li>• Hospital</li> <li>• NGOs working in the field</li> <li>• Community</li> </ul>

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
	<ul style="list-style-type: none"> <li>• Sex and age of perpetrators and survivors</li> <li>• Duration between case reportage, feedback and case completion</li> </ul>				
<b>Community Health and Safety Issues</b>	<ul style="list-style-type: none"> <li>• Uptake of complaints</li> <li>• Number of GBV/SEA/SH cases reported by type and location (community)</li> <li>• Number of GBV/SEA/SH cases under investigation by type</li> <li>• Number of cases under prosecution by type</li> <li>• Number of cases discharged by outcome</li> <li>• Sex and age of perpetrators and survivors</li> <li>• Duration between case reporting, feedback and case completion</li> <li>• Incidence of communicable and non-communicable diseases in the project beneficiary communities</li> <li>• Accidents involving contractors trucks and equipment as well as third party haulage trucks by type and degree of severity</li> </ul>	<ul style="list-style-type: none"> <li>• Daily</li> </ul>	<ul style="list-style-type: none"> <li>• Grievance Redress Register</li> <li>• Grievance Redress Platform</li> <li>• Top ten causes of morbidity from hospital records of the nearest Health Facility</li> <li>• Grieve Redress Register</li> <li>• Reported accidents at local police stations</li> </ul>	<ul style="list-style-type: none"> <li>• MoCI Safeguards Unit</li> </ul>	<ul style="list-style-type: none"> <li>• Sub Project Consultant</li> <li>• Community Monitors</li> </ul>

**Table 4: Monitoring Indicators – Operational Phase**

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
<b>Labour and Working Conditions</b>	<ul style="list-style-type: none"> <li>• Number of ancillary workers with Formal Contracts</li> <li>• Presence of under aged workers (18 years and below) or otherwise</li> <li>• Availability and use of PPE for health care and ancillary workers</li> <li>• Presence of signed Codes of Conduct or otherwise</li> <li>• Arrears of allowances/salaries due health care and ancillary workers or otherwise</li> <li>• Suspected or confirmed cases of COVID-19 cases on site.</li> </ul>	Monthly	<ul style="list-style-type: none"> <li>• Grievance Redress Platform</li> <li>• Snap Checks at the Facility</li> </ul>	<ul style="list-style-type: none"> <li>• MoCI Safeguards Unit</li> </ul>	<ul style="list-style-type: none"> <li>• Local County Authorities</li> </ul>
<b>Occupational Health and Safety Issues</b>	<ul style="list-style-type: none"> <li>• Number, type, place and time of accidents/ incidents and/or near misses</li> <li>• Number of OHS training programmes provided for sub project contractors’ and sub-contractors employees.</li> <li>• Number and type of PPEs distributed at Facility</li> <li>• Number of workers at wearing appropriate PPEs</li> <li>• Presence of dedicate person (Focal Person) or Committee for</li> </ul>	Monthly	<ul style="list-style-type: none"> <li>• Interview with Employees</li> <li>• Training Reports</li> <li>• Premise Inspection</li> </ul>	<ul style="list-style-type: none"> <li>• MoCI Safeguards Unit)</li> </ul>	<ul style="list-style-type: none"> <li>• Local County Authorities</li> <li>• Contractors</li> </ul>

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
	<p>OHS to enforce and monitor or otherwise</p> <ul style="list-style-type: none"> <li>• Employees level of compliance with OHS standards, e.g., wearing of PPE, infection Prevention SOPs, etc.</li> <li>• Presence of Fire Extinguishers at the Facility</li> <li>• Presence of handwashing facilities and hand sanitizers on site or otherwise</li> <li>• Suspected and confirmed infection cases at the Facility</li> <li>• Availability of adequate water and gender-friendly sanitation facilities</li> </ul>				
<p><b>Gender Based Violence, Sexual Exploitation and Abuse, and Sexual Harassment</b></p>	<ul style="list-style-type: none"> <li>• Presence of GBV/SEA/SH or COVID-19 Focal Person within the selected facility</li> <li>• Number of GBV/SEA/SH cases reported by type and location (community)</li> <li>• Number of GBV/SEA/ SH cases under investigation by type</li> <li>• Number of cases discharged by outcome</li> <li>• Sex and age of perpetrators and survivors</li> <li>• Duration between reporting, feedback and case completion</li> </ul>	<p>Monthly</p>	<ul style="list-style-type: none"> <li>• Platform</li> <li>• Grievance Redress Grievance Register at the Facility Level</li> </ul>	<ul style="list-style-type: none"> <li>• MoCI (Safeguards Unit)</li> </ul>	<ul style="list-style-type: none"> <li>• GBV Service Providers</li> <li>• Police</li> <li>• Hospitals</li> <li>• NGOs working in the Area</li> <li>• Community</li> </ul>

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
	<ul style="list-style-type: none"> <li>• Worker awareness about the Grievance Redress System or otherwise</li> </ul>				
<b>Fraud and Abuse of Office</b>	<ul style="list-style-type: none"> <li>• Number of fraud and abuse of office cases reported</li> <li>• Number of cases under investigation</li> <li>• Number of cases under prosecution by type</li> <li>• Number of cases discharged by outcome</li> </ul>	<ul style="list-style-type: none"> <li>• Daily</li> </ul>	<ul style="list-style-type: none"> <li>• Grievance Redress Platform</li> </ul>	<ul style="list-style-type: none"> <li>• Police</li> </ul>	<ul style="list-style-type: none"> <li>• MoCI</li> </ul>

## **9.2 Reporting on the Labour Management Procedure**

Sub-Project Contractors and Consultants will submit Monthly Progress Reports to the PIU with a section dedicated to progress on the implementation of proposals in this Labour Management Procedure and plan prepared based on this procedure. The section will report on non-compliance issues and timelines for compliance, incidence/accident reports, status of grievances received among others. The report will also discuss mitigation measures of identified emerging labour impacts/risks. During the operational phase of the project, monthly reports with the same headings will be prepared by facility managers and submitted to MoCI/PIU.

The PIU Safeguard team will compile a summary of the E&S issues on the Project in a quarter and submit to the Bank in the Quarterly Report. This document will also report on issues relating to ESS2 as well as progress and performance of implementing this LMP.

Annual third-party monitoring reports and a project completion report capturing implementation of the LMP during the entire duration of the project will also be prepared by third party specialists.

## 10.0 CONTRACTOR MANAGEMENT AND CODE OF CONDUCT

The project anticipates engagement of contractors and consultant for various activities to be managed under the project and it will include various categories of personnel. In order to ensure fair competition and transparency, the selection of contractors/consultants will be based on the Bank's approved procurement procedure followed by the MOIC, government of Liberia and this will include i.) competitive bidding through transparent open advertising; ii.) Shortlisting and selection; and iii.) Contractual signing.

The PIU will ensure that the requirements of the Environmental and Social Standard (ESS 2) and non-compliance remedies are incorporated into contractual agreements. Contractors will be required to develop and sign a contractors' ESMP that will also include code of conduct, GBV, SEA/SH, issue of child labour and GRM at contractor's worksite. The project will also strengthen awareness among workers to ensure that they are aware of their entitlements.

The employees/personnel will sign code of conduct. The code of conduct aims at preventing and/ or mitigating social risks within the context of the project. The social risks that may arise include but not limited to GBV; VAC; HIV/AIDS infection and prevention and Occupational Health and Safety. The PIU / Contractors engaged in the project will be required to develop and implement a code of conduct that will commit them to create and maintain an environment which prevents social risks. The developed code of conduct will be reviewed by the Bank. The contractor/PIU will be required to communicate clearly to all those engaged in the project the behaviors which guard against any form of abuse and exploitation in order to prevent social risks. A Sample of the outline of the Code of Conduct is provided in **Annex 2**.

*Sub- project contractors:* Sub-project Contractors will be managed based on Contracts they signed with MoCI. These contracts will be inserted with relevant Environmental and Social Clauses that prohibit any form of discrimination, Child and Forced Labour, guarantees freedom of association, access to grievance redress mechanisms, safe working environment and rights of workers under the Liberian laws in line with the World Bank ESS2. The contract documents for works contractors, primary suppliers as well as for monitoring consultants shall have requirement mandating their employees to sign explicit Codes of Conduct. Periodic mandatory training of all workers on GBV/SEA/SH issues and Code of Conduct.

Accidents/incident reporting must be reported according to the laws and procedures established and commitment plan agreed with the Bank/Association. The number and type of all accidents and incidents including near misses and spills occurring during the construction phase shall be recorded in the Accident Record Book to be kept by each Sub Project Contractor, Sub Contractor or Third Party Suppliers. The information to be captured will include but not limited to the time and type of incident/accident, persons involved, type of injuries/fatality, location of accident and incident. After investigations, the following will be presented as part

of Sub Project Contractors' Monthly Progress Report in addition to the information specified above:

- cause(s) of the accident/incident;
- remedial/corrective measures; (including sanctions, if necessary); and
- compensatory measures, if necessary

Sub-Project Contractors shall notify their Supervising Consultant and the MoCI/PIU within twelve (12) hours after the occurrence of any accident results in significant damage or loss of property, disability or loss of human life, which could reasonably be foreseen to have a material impact on the environment. They will submit to the same, no later than twenty-eight (28) days after the occurrence of such an event, a summary report thereof.

*Direct supply workers:* MoCI shall ensure that any contractors or suppliers engaged under the project have sound environmental and social standards and management practices in place. Therefore, all suppliers to the project must be assessed to ensure compliance to the required environmental and social management standards. The assessment should be embedded in in the tendering, hiring and contracting processes, and any due diligence measures required in the sourcing of supplies for the project.

The contract documents for primary suppliers include among others, explicit clauses on child and forced labour, GBV/SEA/SH as well as responsible extraction of natural resources.

**ANNEXES**

**Annex 1: Workers' Grievance Log and Resolution Form**

**1. Name (Filer of Complaint):** \_\_\_\_\_

**2. ID Number:** \_\_\_\_\_ (PAPs ID number)

**3. Contact Information**

**Address:**

**Phone number:**

**4. Nature of Grievance or Complaint:**

**5. Are there adverse impacts associated with this complaint/grievance. Yes/No**

**5a: List them:**

**6. Complainant suggestion/s on how grievance/complaint can be resolved**

**7. Date Individuals Contacted Summary of Discussion:**

Signature \_\_\_\_\_ Date: \_\_\_\_\_

Signed (Filer of Complaint): \_\_\_\_\_

Name of Complainant: \_\_\_\_\_ (if different from Filer)

Position or Relationship to Filer: \_\_\_\_\_

**6. Review/Resolution**

Date of Conciliation Session: \_\_\_\_\_

Was Filer Present? : Yes /No

Was field verification of complaint conducted? Yes/ No

**Findings of field investigation:**

**7. Summary of Conciliation Session Discussion:**

\_\_\_\_\_  
Was agreement reached on the issues? Yes No

If agreement was reached, detail the agreement below:

If agreement was not reached, specify the points of disagreement below:

Signed (Conciliator): \_\_\_\_\_

Signed (Filer): \_\_\_\_\_

Signed: \_\_\_\_\_

Independent Observer

Date: \_\_\_\_\_

## **Annex 2: Code of Conduct**

This Code of Basic Labour Conditions and Human Rights represents the commitment of -----  
-- *(insert company name)* to fundamental standards that make ----- *(insert company name)*  
the right place to work.

----- *(insert company name)* prides its employees as its most vital asset. The individual and  
collective contributions of ----- *(insert company name)* people at all levels are essential to the  
success of the company.

In recognition of this, ----- *(insert company name)* has developed policies and practices  
designed to ensure that employees enjoy the protection afforded by the concepts set forth in  
this Code.

----- *(insert company name)* is committed to the protection and advancement of human rights  
in its operations, and the concepts in this Code are generally derived from ----- *(insert company  
name)* policies and practices described in the Labour Management Procedure (LMP) prepared  
for the project. These reflect labour and human rights standards from the International Labour  
Organization, the Universal Declaration of Human Rights, Liberia labour law and the WB ESS  
2 on labour and working conditions.

### **Non-Discrimination and Harassment**

It is the policy of ----- *(insert company name)* to attract and retain the best qualified people  
available without regard to race, colour, religion, national origin, gender, sexual orientation,  
gender identity, age, veteran status, physical or mental disability etc.. Our non-discrimination  
policy applies to applicants as well as employees, and covers all terms and conditions of  
employment, including recruiting, hiring, transfers, promotions, terminations and total  
compensation benefits.

Discrimination or harassment based on any of the above factors is prohibited, as is retaliation  
against a person who has made a complaint or given information regarding possible violations  
of this policy.

### **Freedom of Association**

----- *(insert company name)* recognize and respect the legal rights of the employee to join or  
not to refrain from joining any lawful organization of their own choosing. ----- *(insert company  
name)* is committed to complying with laws pertaining to freedom of association, privacy and  
collective bargaining. The company's established belief is that the interests of ----- *(insert  
company name)* and its employees/contractors are best served through a favourable, collective  
work environment, with direct communication between employees and management.

### **Environment, Health and Safety**

----- (*insert company name*) is very much committed to as far as reasonably possible, providing services and products in a safe and responsible manner with due care to employees, customers, contractors, visitors and the general public. As a minimum requirement, the company shall meet their specific statutory legal, health, safety, security and environmental obligations.

The goals across the organization are synonymous:

- Pursuit of no harm to people.
- Pursuit of protection of Health, safety and security is managed with the same high regard as all other critical business activities.
- Pursuit of protection and preservation of the Environment is managed with the same high regard as all other critical business activities.

As such, a systematic approach to Environment, Security, and Health and Safety management is adopted to ensure compliance. In addition to any minimum legislative requirements, measurements and appraisals are taken on company performance, the objective of which is to effect continuous improvement throughout the company.

Providing employees with a safe and healthy working environment, protecting the environment wherever we conduct business and striving for excellence in safety, health and environment stewardship.

#### Work Environment and Compensation

----- (*insert company name*) is committed to promoting a work environment that fosters communication, productivity, creativity, teamwork, and employee engagement. As a company, we seek to provide employees with compensation and benefits that are fair and equitable for the type of work and geographic location (local market) where the work is being performed, and competitive with other “world class” companies.

#### Hours of Work and Work Scheduling

----- (*insert company name*) establishes work shifts and schedules work as appropriate to meet business needs and to comply with applicable laws and/or collective bargaining agreements/employees hand book and codes of practice.

#### Slavery, Human Trafficking, Forced Labor and Child Labour

----- (*insert company name*) believes that the employment relationship should be voluntary, and the terms of employment must comply with applicable laws and regulations. We are therefore opposed to slavery, human trafficking, forced labour and child labour. We are committed to complying with applicable laws prohibiting such exploitation.

----- (*insert company name*) informs its employees, contractors and vendors about this Code. We encourage our partners and vendors to adopt and enforce concepts similar to this Code. Employees who believe there may have been a violation of this Code report it through

confidential established channels. ----- (*insert company name*) may conduct assessments, as needed, to measure compliance. ----- (*insert company name*) will periodically review this Code to determine whether revisions are appropriate.

The purpose of this Code is to maintain zero tolerance for slavery, human trafficking, forced labour and child labour. The policy on human trafficking applies to all its employees as well as to any persons whose functions are related to ----- (*insert company name*) work.

Employees of ----- (*insert company name*) and Contractors whose functions relate to ----- (*insert company name*) operations shall not:

- Use forced labour in the performance of any work,
- Engage in human trafficking,
- Engage in commercial sex acts,
- Deny employees access to his/her immigration documents such as passports, driving license, etc.,
- Use misleading recruitment practices,
- Use recruiters that do not comply with Labour Laws of Liberia or the law of the country/place where the recruitment takes place,
- Fail to provide a flight ticket to destination or country of permanent residence at the end of contract/employment,
- In the event of violation of this policy, ----- (*insert company name*) may take action against the violating employee or contractor to include termination of contract.

Expectations For Our Sub-contractors / Suppliers/ Workers

----- (*insert company name*) is committed to the highest standards of ethical and business conduct as it relates to the procurement of goods and services and for doing work. Our relationships with our sub-contractors and / or suppliers, including our consultants and contract labour, are defined by contracts, which are based on lawful, ethical, fair, and efficient practices.

As a company, we have outlined our expectations for basic code of conduct, together with our Statement of Corporate, Social Responsibility, and it is a must for all our subcontractors/suppliers and workers to adhere to these expectations.

Having read, and discussed ineptly, the above ----- (*insert company name*) Code of Conduct (dated -----),

I, .....,  
designation ....., do hereby certify that I have read, noted and adhere to abide by the above ----- (*insert company name*) Code of Conduct (dated -----).

Dated .....