



KINGDOM OF CAMBODIA



Ministry of Mines and Energy (MME)



Electricité du Cambodge (EDC)

**Cambodia Sustainable Energy Transition (CSET) Project
(P510217)**

Labor Management Procedures (LMP)

(Draft Version)

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DRAFT

Abbreviations

ARDB	Agricultural and Rural Development Bank of Cambodia
BESS	Battery Energy Storage System
CESMP	Contractor's Environmental and Social Management Plan
CSET	Cambodia Sustainable Energy Transition
EDC	Electricité du Cambodge
EE	Energy Efficiency
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
EV	Electric Vehicle
Fis	Financial Intermediary
FTB	Foreign Trade Bank
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GS	Grid Substation
HIV/AIDS	Human Immunodeficiency Virus/ Acquired Immunodeficiency Syndrome
LMP	Labor Management Procedures
MME	Ministry of Mine and Energy
MEF	Ministry of Economy and Finance
MISTI	Ministry of Industry, Science, Technology and Innovation
NEEP	National Energy Efficiency Program
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PIC	Project Implementation Consultant
PMO	Project Management Office
PMU	Project Management Unit
RGC	Royal Government of Cambodia
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SEPRO	Social, Environmental and Public Relations Office
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SME	Small and Medium Enterprise Bank of Cambodia
STD	Sexually Transmitted Diseases
UXO	Unexploded Ordnance
VAC	Violence Against Children
WB	World Bank

EXECUTIVE SUMMARY

A. THE PURPOSE OF LABOR MANAGEMENT PROCEDURES

This Labor Management Procedures (LMP) is prepared in accordance with the World Bank's Environmental and Social Framework (ESF), particularly the ESS2 (Labor and Working Condition), ESS4 (Community Health and Safety), and ESS10 (Stakeholder Engagement and Information Disclosure). The main purpose of the LMP is to identify risks and potential impacts associated with the engagement, use, and management of labor to be engaged under the Cambodia Sustainable Energy Transition (CSET) Project. The LMP focuses on all workers, including the local workers who are vulnerable to labor risks. Based on identified risks and potential impacts, mitigation measures, including grievance redress mechanism, and implementation arrangements, are proposed. The LMP is a living document and is subject to update when needed during project implementation.

B. OVERVIEW ON LABOR USE UNDER THE PROJECT

The World Bank's ESS2 (Labor and Working Condition) classifies workers engaged under a World Bank financed project, into four categories: direct workers, contracted workers, community workers and workers of primary suppliers. However, under the CSET project, there are only three types of workers identified whether full time, intermittent, temporary, seasonal, or migrant workers – direct workers, contracted workers, and primary supply workers. Community workers will not be employed under the CSET project. The total project workers is estimated 679 project workers under the CSET project. It is estimated that 60 people may be involved as other stakeholders working in connection with the CSET project.

C. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The project has two Project Components, of which Component 1: Grid Strengthening for facilitation of Energy Transition and Power Trade will involve physical construction of the Battery Energy Storage System (BESS), Electric Vehicle (EV) charging station, the 15 km 230 kV double circuit overhead transmission, and new 115 kV substations as well as the construction of MV and LV distribution networks to unelectrified villages. Project Component 2: Industrial Energy Efficiency Investments will promote the adoption of energy efficient technologies, and practices within the industrial sector. This component will provide concessional loans via Financial Institutions (FIs) to industrial enterprises for the purchase, installation, and operation of EE equipment, which helps reduce energy consumption and lower GHG emissions.

Based on the nature and scope of potential civil works, as well as the geographical characteristics of the potential construction sites in both urban and rural areas, the following hazards and risks are anticipated, and categorized into the following types: a) Occupational Health and Safety (OHS), b) Labor Influx, c) Sexual Exploitation and Abuse, Sexual Harassment, and Violence Against Children, d) Child labor, e) Forced or Compulsory Labor, f) Discrimination and Exclusion of Disadvantaged/ Vulnerable groups) Temporary Workers. All workers shall be made aware of the workers and project's grievance mechanisms, and how to access them. It is noted that consultants engaged under all Project Components are subject to OHS requirements – as described in this LMP.

D. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

The terms and work conditions of the workers under the CSET project are in line with the Labor Law (1997), which is the regulatory framework that provides regulations against discrimination, promotes fair treatment and equal opportunity (decent work) in employment and wages, and provides protection and assistance to vulnerable workers. This Law is dedicated to promoting health and safety in the workplace and applicable to anyone who is engaged through working contract.

E. BRIEF OVERVIEW OF OCCUPATION HEALTH & SAFETY LEGISLATION

The provisions for occupational health and safety are also highlighted in the Labor Law (1997). These provisions are mostly in line with the World Bank's ESS2. The OHS provisions in the Labor Law 1997 establish and enforce standards and regulations to ensure employees work in a safe and healthy environment by. The provisions also define the rights and responsibilities of employers, employees, and other relevant parties in exercising OHS principles and propose measures for prevention of occupational accidents, diseases, and

ensure work safety. Under the CSET project, the numbers of related OHS regulations will be applied as described below:

- Prakas No 052 dated 01 February 2000 concerning Sanitary Toilet.
- Prakas No 054 dated 01 February 2000 concerning provision of the Safe Drink.
- Prakas No 124 dated 15 June 2001 concerning Heavy Object Lifting by Hand.
- Prakas No 125 dated 15 June 2001 concerning Air Ventilation and Sanitation.
- Prakas No 138 dated 22 April 2003 concerning Noise at Workplace.
- Prakas No 106 dated 28 April 2004 concerning Prohibition of Children Working in Dangerous Workplace.
- Prakas No 075 dated 30 March 2011 concerning Sanitation at the Construction Site.
- Prakas No 077 dated 30 March 2011 concerning Information at the Construction Site.
- Prakas No 078 dated 30 March 2011 concerning Storage, Waste Management and Cleanliness at Construction Site.
- Prakas No 109 KB/PrK dated 17 March 2016 (Ministry of Labor and Vocational Training) on Healthcare Benefits.

F. RESPONSIBLE STAFF

As the key project owner, the Project Management Unit (PMU) of the Ministry of Mine and Energy (MME) and the PMU of the Electricité du Cambodge (EDC), are responsible for the overall implementation of this LMP. Before the project implementation, EDC will create a Project Management Office (PMO) under the PMU and ensure that the PMO will carry out day-to-day project implementation and management and that all project workers are recruited and managed in accordance with this LMP's requirements, the Labor Law (1997), occupational health and safety regulations, and other relevant laws and regulations. Specifically, PMO will engage the Project Implementation Consultant (PIC) to oversee the works of contractors.

The contractors will be responsible to develop and implement contractor's LMP as part of the Contractor Environmental and Social Management Plan (C-ESMP) as well as to maintain a safe working environment at project's construction sites and other requirements stated in this LMP.

G. POLICIES AND PROCEDURES

The MME and EDC will incorporate the requirements in this LMP in the tender document and contract documents to ensure that potential bidders are aware of environmental and social performance requirements and are able to implement such requirements for the duration of the contract.

The contractor is required to ensure that all documentation related to their environmental and social performance, including activities related to the LMP, are available for inspection at any time by the PMUs. All workers will be trained and will be required to sign an Individual Code of Conduct, including Manager, as applicable.

- **Occupational Health and Safety (OHS)**

To ensure the safety of workers traveling to remote sites, the OHS strategy will include specific measures, such as:

- (1) requiring only professional drivers to operate project cars and requiring seatbelt use inside of them;
- (2) requiring drivers and passengers to wear helmets when operating project motorcycles, including private motorcycles when used for project-related tasks and avoid travel at night;
- (3) travel by motorcycle for project-related purposes shall be during daytime
- (4) refrain from driving when under the influence of alcohol or any drugs,
- (5) measures to monitor, anticipate and avoid potential security risks while travelling, including liaison with local police and authorities and encouraging project workers to share any concerns they may have.

- **Dissemination and Awareness**

The following steps will be carried out by the PMUs during project implementation.

- Key OHS requirements developed under the LMP will be included in Contractor's Bidding Document and Work Contract.

- All Contractors will be required to prepare their own Contractor's-ESMP (C-ESMP) where the Contractor will include the Contractor's LMP to identify/update the risks related to OSH (based on the site condition, their equipment/tools, and their workers' skills and experience, etc.) and propose measures to mitigate such risks.
- C-ESMP will be reviewed by the PIC, SEPRO, and approved by PMO before Contractor is authorized to mobilize staff and their equipment to the construction site.

H. AGE OF EMPLOYMENT

The minimum working age required for the CSET project is 18 years of age. This requirement applies to both national and international workers. Prior to the engagement of labor, workers will be required to provide their identification card or birth certificate for age verification before commencing project related works. In the absence of these official documents, alternative methods could be used to support the age verification, such as a testimony/affidavit from commune level where the potential employee was born or currently lives. Contractors will check all supporting documents for age verification for their validity. A copy of the document used for age verification will be kept on the Contractor's record.

I. TERMS AND CONDITIONS

All terms and conditions outlined in the World Bank's ESS2 (paragraphs 10 to 15) will be adopted and applied to contracted workers in line with the national regulations.

J. GRIEVANCE REDRESS MECHANISM (GRM)

The GRM will consist of the following four steps of conflict resolution: Step 1 can be presented to the Contractor, commune council via village or commune chief, Step 2 can take the issue to PMO / Social, Environmental and Public Relations Office (SEPRO) via the commune council, step 3 brings the case to district office, and step 4 take the issues to provincial GRC.

K. CONTRACTOR MANAGEMENT

Contractors, including all subprojects, shall execute the management of the contract in a manner that is acceptable to the client and is in accordance with the World Bank rules and regulations as it relates to ESS2, particularly relating to the selection process for contractors, management of labor issues, including health and safety, procedures for managing and monitoring of performance for contractors, as well as reporting on working conditions.

L. PRIMARY SUPPLY WORKERS

Given the nature and scope of the project's civil works may require the supply of construction materials such as aggregates, cement, and miscellaneous materials. Some contractors may be able to produce some of the construction materials using their own workforce. However, where the contractors procure 1) essential materials, 2) directly from primary suppliers for the core functions of the project, and 3) on an ongoing basis, the workers engaged by such primary suppliers are considered "primary supply workers" as defined in the World Bank's ESS2. As discussed in Section 3. Key Labor Risks, the OHS risks are also deemed to be generally significant in the construction sector, including quarry sites where no functioning labor inspection mechanism is in place.

1. INTRODUCTION

1.1 Project Overview

The Cambodia Sustainable Energy Transition (CSET) Project (P508278) is a World Bank-financed initiative designed to support Cambodia's long-term energy transition by enhancing grid reliability, integrating renewable energy sources, and promoting industrial energy efficiency. The project aligns with Cambodia's Power Development Plan (PDP) and the government's commitment to achieving a 70% renewable energy mix by 2030, while also ensuring energy affordability and security. Through targeted infrastructure investments and policy interventions, the project aims to modernize Cambodia's energy sector, expand electricity access, and improve energy efficiency in key industries.

1.2 Project Development Objective and Project Components

- Project Development Objective.

The project aims to support the government's energy sector priorities by:

- strengthening grid reliability and capacity in the Phnom Penh–Kandal corridor.
- deploying grid-scale Battery Energy Storage Systems (BESS) to enable renewable integration and load shifting.
- expanding and reinforcing distribution networks in priority EDC service areas and
- supporting industrial energy-efficiency financing through a simplified credit-line arrangement managed by MME.

These objectives align with the goals of the NEEP and the government's socio-economic development agenda.

- Project Components.

To meet the above PDO, the following project activities will be implemented. These activities are organized into three components, as summarized below:

Component 1: Grid strengthening for Energy Transition (Implemented by EDC – US\$ 115 million IDA)

This component addresses the urgent need to reinforce grid capacity and reliability in support of renewable-energy integration. It includes three sub-components.

- **Sub-Component 1.1 Grid Strengthening (Transmission Lines and Substations) (US\$ 43.5 million)**

Construction of one 230 kV and one 115 kV double-circuit transmission line (approx. 15 km) connecting Lvea Am – Arey Ksat – Chroy Changvar III – Wat Phnom, including two new GIS substations (ARK and CCVIII), extensions of 230kV Line Bays at GS Lvea Am and extensions of 115kV Line Bays at GS Wat Phnom and GS9. Supports Phnom Penh load growth and clean-power imports from Laos.

- **Sub-Component 1.2 Battery Energy Storage System (BESS) (US\$ 35 million)**

Deployment of 100–150 MW grid-scale BESS to enhance system stability and enable load shifting for renewable energy integration.

- **Sub-Component 1.3 Distribution Network Expansion and Strengthening (US\$ 15 million)**

Upgrade and extend distribution lines (MV (underground, overhead lines), poles, transformers) in EDC license areas to reduce losses and improve service quality; prepare for future e-mobility connections and EV infrastructure. Installation of Advanced Meter Infrastructure (AMI) will also be included as part of the component.

Component 2: Industrial Energy Efficiency Improvement (Implemented by MME – US\$ 15 million IDA)

This component promotes the adoption of energy-efficient technologies across Cambodia's industrial sector through concessional credit facilities.

- **Sub-Component 2.1 Industrial Energy Efficiency Credit Line (US\$ 15 million)**

Establishment of a credit line managed by MME and implemented through the SME Bank of Cambodia (as Policy Bank) and the Foreign Trade Bank (FTB) (as Participating Financial Institution). Financing will be provided to industrial enterprises for eligible energy-efficiency technologies. The credit line will support both direct (Type-A) lending model and indirect (Type-B) lending model.

Component 3: Implementation Support and Technical Assistance (US\$ 6.5 million – US\$ 1.5 million IDA + US\$ 5 million Grant)

- **Sub-component 3.1 Implementation Support to MME (US\$ 5 million/Grant)**

Grant support to strengthen MME capacity to manage the energy-efficiency credit line and oversee environmental and social risk management. Covers training, technical consultancy, development of Operational Manual, and ESMS capacity building for policy banks.

- **Sub-component 3.2 Implementation Support to EDC (US\$ 1.5 million/IDA)**

Technical and safeguards support for EDC's PMU on procurement, financial management, engineering supervision, and E&S compliance monitoring through SEPRO.

1.3 Purpose of Labor Management Procedures

This Labor Management Procedures is prepared in accordance with the WB's Environmental and Social Framework (ESF), particularly the ESS2 (Labor and Working Condition), ESS4 (Community Health and Safety), and ESS10 (Stakeholder Engagement and Information Disclosure). The LMP is also in line with relevant laws and regulations of the Royal Government of Cambodia (RGC). The main purpose of the LMP is to identify risks and potential impacts associated with the engagement, use, and management of labor to be engaged under the CSET project. Based on identified risks and potential impacts, mitigation measures, including grievance redress mechanism, and implementation arrangements, are proposed. The LMP is a living document and is subject to update when needed during project implementation.

2. OVERVIEW ON LABOR USE UNDER THE PROJECT

The World Bank's ESS2 (Labor and Working Condition) classifies workers engaged under a World Bank financed project, into four categories: direct workers, contracted workers, community workers and workers of primary suppliers.

- **Direct workers** – people employed or engaged directly by the PMU (including the project proponent and the project implementing agencies) to work specifically in relation to the project.
- **Contracted workers** – people employed or engaged through construction contractors, and subcontractors, to perform activities related to construction of the civil works. Contracted workers include those mobilized under consultancy assignments. Contracted workers could be either those engaged internationally – as foreigners, and/or Cambodian people. Workers indirectly employed through subprojects financed by FIs (Component 2) will be subject to labor safeguards as per ESS2. Their working conditions will be monitored through FI reporting mechanisms.
- **Primary supply workers** – people engaged by PMU's contractors as primary suppliers. Primary supply workers include those who are hired by main suppliers of construction materials and goods for core functions¹ of the project.

¹ Core functions of the CSET project refers to those production and/or service processes that are deemed essential for a specific subproject activity without which the subproject cannot continue.

- **Community workers** – local people who are engaged to provide labor as a contribution to the project, such as on a voluntary basis.

Under the CSET project, the following types of workers are identified whether full-time, intermittent, temporary, seasonal, or migrant workers:

Table 2- 1. Type of project workers under the CSET

Type of workers under the CSET	Characteristic of project workers	Number of project workers*
Direct workers	Under this project, direct workers are individuals who are directly employed by the MME's Project Management Unit (PMU) and EDC's PMU for project purpose. The estimated number of director workers would not likely exceed 10 people to support the MME's PMU and 19 people to support the EDC's PMU. These people are engaged for different roles such as administration staff, accountant, IT, environmental specialist, social specialist, energy specialist, procurement specialist, etc. These specialists are hired under individual contracts, on intermittent basis, with specific definition of the assigned tasks and responsibilities.	Total: 29 MME: 10 EDC: 19
Contracted workers	During project implementation, the MME and the EDC has established the PMU and the PMU will create the Project Management Office (PMO) for the day-to-day management of the project. Under the EDC component, the PMO will engage the Project Implementation Consultant (PIC) to assist EDC with the implementation of the project and oversight of the contractors for the construction of the BESS, the 15 km 230 kV double circuit overhead transmission lines, and new 115 kV substations. as well as the construction of MV and LV distribution networks to unelectrified villages. The contractor might need engagement of multiple subcontractors. The subcontractors' workforce will be also considered as contracted workers. It is estimated that a total of 450 people would be engaged to support the construction of overhead transmission line and new substations, and other services such as technical assistance.	Total: 450 MME: 10 EDC: 440 (40 for BESS construction per site, 80 for transmission lines, and 120 for MV and LV construction to unelectrified villages.)
Primary supply workers	Workers working in companies, factories, and enterprises that directly and regularly supply goods and construction materials essential to the core functions of the subprojects are considered primary supply workers under the CSET project. It is estimated that 100 people may be involved as primary supply workers to support construction of the transmission line and new substations to throughout project life (See Section 12 for details on primary supply workers).	100
Community workers	The community workers will not be employed under the CSET to support the project implementation.	-
Total		679

*This number is estimated based on the expected numbers of workers from each PMU.

The other stakeholders involved in the CSET project will include civil servants directly employed by the government following to their existing arrangements despite of their working condition either full time or intermittent. These include civil servants who are currently staff of MME, EDC, the Ministry of Economy and Finance (MEF), the Ministry of Industry, Science, Technology and Innovation (MISTI), stated owned financial

intermediaries (Fis), such as Small and Medium Enterprise Bank of Cambodia (SME), and the Foreign Trade Bank (FTB), and staff from other line ministries are also considered stakeholders involved in the project. It is estimated that 60 people may be involved as other stakeholders working in connection with the CSET project.

3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

3.1 Project activities

The project has two Project Components, of which Component 1: Grid Strengthening for facilitation of Energy Transition and Power Trade will involve physical construction of the BESS, EV charging station, the 15 km 230 kV double circuit overhead transmission lines, and new 115 kV substations as well as the construction of MV and LV distribution networks to unelectricified villages. Project Component 2: Energy Efficiency Improvement will promote the adoption of energy efficient technologies, and practices within the industrial sector. This component will provide concessional loans via Fis to industrial enterprises for the purchase, installation, and operation of EE equipment, which helps reduce energy consumption and lower GHG emissions. It is noted that consultants engaged under all Project Components are subject to OHS requirements – as described in this LMP. Under ESS9, FIs are required to manage environmental and social risks in subprojects, including labor risks. Workers engaged by sub-borrowers (e.g., rice mills, garment factories installing EE tech) may face OHS issues, low pay, or lack of contracts. Even if FIs handle the funds, the project is still responsible for ensuring basic ESS2 compliance.

3.2 Key Labor Risks

Based on the nature and scope of potential civil works, as well as the geographical characteristics of the potential construction sites in both urban and rural areas, the following hazards and risks are anticipated, and categorized into the following types: a) Occupational Health and Safety (OHS), b) Labor Influx, c) Sexual Exploitation and Abuse, Sexual Harassment, and Violence Against Children, d) Child labor, e) Forced or Compulsory Labor, f) Discrimination and Exclusion of Disadvantaged/ Vulnerable groups) Temporary Workers, as described below. All workers shall be made aware of the workers and project's grievance mechanisms, and how to access them. Component 2 of the CSET Project involves concessional lending through Financial Intermediaries (FIs) to industrial enterprises for energy efficiency upgrades. While the project will not directly hire workers for these subprojects, workers engaged by sub-borrowers (e.g., installers of EE equipment, factory personnel involved in retrofits) may qualify as project workers under ESS2. Therefore, participating FIs will be required to integrate basic labor management procedures into their due diligence, including ensuring compliance with Cambodian labor law, minimum working age, freedom from forced labor, and occupational health and safety standards. Monitoring arrangements will be coordinated between the FIs, PMO, and PIC, and regular reports will be submitted to ensure alignment with the LMP.

Table 3- 1. Hazards and Risks Levels and Mitigation Measures

Hazards and Risks	Description	Hazards and Risks Level before applying Mitigation Measures
Occupational Health and Safety (OHS) Risks:	<p>General OHS Risks:</p> <ul style="list-style-type: none"> Physical Hazards. Physical hazards represent potential for accident or injury or illness due to repetitive exposure to mechanical action or physical activities. Physical hazards may result in a wide range of injuries, from minor that needs medical aid only, to disabling, catastrophic, and/or fatal. Accidents due to falls: falling from ladders, scaffoldings, and vehicles, etc. Accident due to falling objects: Tools, machinery, equipment and materials used during construction may fall from the height, causing injuries or death. Fall into open holes: holes, manhole, and areas of deep excavation may be commonly found at works. Fall into these holes may cause injuries of various degrees. Physical injury related to the operations of heavy equipment: Injury or death may result during 	<p>Risks Level: Moderate</p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> The risk associated with the OHS are expected to be moderate and manageable, through adhering to the contractual requirements, codes of conduct and training set out in this LMP. The contractors will also be required to develop and implement the Contractor's Labor Management Procedures (C-LMP) as part of C-ESMP, including procedures to establish and maintain a safe working environment as per requirements of ESS2.

Hazards and Risks	Description	Hazards and Risks Level before applying Mitigation Measures
	<p>operations of heavy equipment, such as crane, excavator, cuts and bruises on sharp objects etc.</p> <ul style="list-style-type: none"> • Accidents due to prolonged exposure to sunlight (during dry season), rain and flood, etc. • Chemical hazards. Chemical hazards represent potential for illnesses or injuries, both short and long term, and fatalities due to single acute exposure or chronic repetitive exposure to toxic, corrosive, sensitizing or oxidative substances. Common chemicals used in construction include Portland cement clinker (mineral binders), formaldehyde (wood-based materials), polyurethane, vinyl, cadmium or lead (paints and resins), and solvents. They also represent a risk of uncontrolled reactions, including the risk of fire and explosion, if incompatible chemicals are inadvertently mixed. • Fire and Explosions. Fires and or explosions resulting from ignition of flammable materials or gases can lead to loss of property as well as possible injury or fatalities to project workers. • Corrosive, oxidizing, and reactive chemicals. Corrosive, oxidizing, and reactive chemicals present similar hazards and require similar control measures as flammable materials. • Personal Protective Equipment. PPE provides additional protection to workers exposed to workplace hazards in conjunction with other facility controls and safety systems. Worker may sustain physical injuries if they do not have access to the proper PPE. • Working Time: Civil work project sites are most likely to be in remote areas. For safety reasons, the project should require contractors, whenever possible, to allow workers to work during daytime. In case night shift is required because of the urgency of the work, proper safety measures, including sufficient lighting and surrounding security, must be taken. • Risk of lack of hygiene at workers' camp: There is a risk of lack of hygiene condition at workers' camp. This risk is related to lack of adequate supply of potable water, washing facilities, sanitation, accommodation, and cooking facilities which may affect the hygiene and health condition of workers, and their health status as a result. <p>Specific OHS Risks relevant to CSET project</p> <p>Given the scope of infrastructure construction under the CSET Project — including high-voltage substations, transmission lines, Battery Energy Storage Systems (BESS), EV charging infrastructure, and related infrastructures— workers are likely to be exposed to a wide range of potentially hazardous activities. Anticipated specific OHS risks include:</p> <ul style="list-style-type: none"> • Electrical hazards from working with or near high-voltage equipment, cables, transformers, and 	

Hazards and Risks	Description	Hazards and Risks Level before applying Mitigation Measures
	<p>energized systems during the construction and testing of substations and BESS.</p> <ul style="list-style-type: none"> ● Fire and explosion risks, particularly in BESS installations and operation, due to lithium-ion battery thermal runaway or inadequate containment and fire suppression systems. ● Fall hazards when working at heights during tower erection, or cable stringing for transmission lines. ● Confined space hazards in the construction of underground conduits, or substation equipment rooms. ● Mechanical hazards involving heavy lifting equipment (e.g., cranes, excavators, boom lifts), leading to crush injuries or struck-by incidents. ● Chemical exposure during battery handling, fuel storage, resin insulation application, or site cleaning operations. ● Heat stress and dehydration, especially in remote areas with high ambient temperatures. ● Noise and vibration from drilling, pile-driving, and operation of heavy machinery as well as those generated by ongoing substation operations, such as transformer hum, cooling fans, and switching equipment. ● Traffic accidents on Road or In River from increased heavy vehicle/boats movement during equipment delivery along construction access roads or along the Mekong River. ● UXO risks (Unexploded Ordnance) in rural or previously undeveloped areas. ● Wildlife or snakebite risks in remote or forest-adjacent sites. 	
Labor influx	<p>Although the contractors will be encouraged to hire workers from within the local communities, to support construction of the civil works, the contractors are likely to bring their own staffs, such as project manager, technician and skilled workers. The contractors' staff may not share the same cultural characteristics as local people. It is anticipated that there would be some people who may gather to project sites to provide services to project workers. These people may contribute to the risk associated with labor influx, including:</p> <ul style="list-style-type: none"> ● Increased pressure on residents as a result of increased demand from the workforce of contractors, including non-locals who associate with the workforce, for food, fuel, and housing. These could include the families of the workers, sex workers, small businesses in the area, job seekers, and others.; ● Potential social conflicts with local people. ● Increased health risks, such as contracting communicable diseases, such as GBV, SEA/SH, HIV/AIDS, and non-communicable diseases (dengue fever, flu, etc.). 	<p>Risks Level: Low</p> <p>Mitigation Measures:</p> <p>The risk associated with the labor influx are expected to be minor and manageable, through adhering to the contractual requirements, codes of conduct and training set out in this LMP.</p>

Hazards and Risks	Description	Hazards and Risks Level before applying Mitigation Measures
	<ul style="list-style-type: none"> Increased risk of traffic accidents, particularly for those living in the vicinity of the civil works and those who travel near the construction area. 	
Sexual Exploitation and Abuse, Sexual Harassment, and Violence Against Children	<p>The social risks associated with this project include sexual abuse and exploitation (SEA), sexual harassment (SH), and violence against children (VAC). These risks are due to 1) concentration of labour engaged for construction of the BESS, EV charging station, the 15 km 230 kV double circuit overhead transmission lines, and nw 115 kV substations as well as the construction of MV and LV distribution networks to unelectricified villages, 2) frequent visits of project workers, and 3) increased level of this risk due to pre-existing SEA/SH issues in the subproject's area of influence. It is noted that labor influx includes not only workers but also people who are local and non-local that gravitate to construction sites temporarily to provide logistics services for contractor's workers during construction stage.</p> <p>A civil-work subproject may require approximately 440 workers to carry out construction activities. To reduce risk, various measures will be implemented to target different project stakeholders, such as main contractors, subcontractors, local people (including IP), local government, SEA/SH service providers, and so on.</p>	<p>Risks Level: Moderate</p> <p>Mitigation Measures:</p> <p>Given the availability of these proposed measures and low awareness of local people, the risk of SEA/SH/ VAC is evaluated as "Moderate" by the time of project preparation. The risks below are likely when local people (engaged as local unskilled workers) are not aware of their right and terms and working condition as project labor.</p> <p>To reduce the likelihood of SEA/SH/VAC, the MME and EDC will make an effort to encourage the use of local labor force, thereby minimizing labor influx and associated risks. Contractors will be required, in work contract, to engage local people for both skilled and unskilled workforce, where possible. Priority will be given to local people. Income earned through temporary work is expected to serve as an additional source of income to support their livelihood of those who are affected by the project.</p> <p>Main contractors and subcontractors will be required to train their workers on Workers' Code of Conduct related to SEA/SH/VAC to minimize these risks. The Workers' Code of Conduct is considered a zero-tolerance policy to sexual exploitation & abuse, and sexual harassment. The observation of Individual Code of Conduct, as exercised by workers of both main and subcontractors will be closely monitored by the MME and EDC. As part of mitigation measures, contractors will conduct training, including refresher training, for their own workers, and monitor their workers' observation of the Individual Code of Conduct, including application of disciplinary actions for violation.</p> <p>To raise community's awareness of these risks, the PIC and the SEPRO of the EDC will carry out SEA/SH/VAC awareness campaign as part of its Information, Education, Communication (IEC) program. Awareness raising on SEA/SH/VAC will be integrated into consultation sessions, meetings, and trainings that the PIC</p>

Hazards and Risks	Description	Hazards and Risks Level before applying Mitigation Measures
		organizes with the participation of local people, local government, PMO's direct workers, project proponents and stakeholders working involved in the project. Distribution of project information booklets, project's SEA/SH/VAC complaint handling procedure is another measure that promotes outreach to reach people who do not have a chance to attend community meetings.
Child labor	<p>The 1997 Labor Law establishes the age of 15 years as the minimum working age. According to the World Bank's ESS2, however, the required minimum working age is 14 or higher, as specified by national law.</p> <p>During the project construction activities, there is a possibility that local labor under 18 years of age is engaged by construction contractors and subcontractors to perform unskilled works. However, the contractors under the CSET project are required to hire workers who are 18 years of age or older.</p>	<p>Risks Level: Low</p> <p>Mitigation Measures:</p> <p>Before a contract is signed, the contractor is required to verify all worker's age using evidence that is legally accepted, such as identification card, or a testimony/affidavit from commune level. The requirement for minimum working age of 18 years will be included in bidding documents, and in work contract that the PMO signs with each of the awarded contractors. The PIC and SEPRO will need to conduct regular monitoring including verification of the age of the workers and share the report to the PMU.</p>
Forced labor	Forced labor is forbidden under the Labor Law (Article 15, Section 5). Forced labor includes situations where persons are coerced to work through use of violence or intimidation, manipulation of debt, retention of identity papers, threats, or other forms of retaliation. Hiring of people to work in order to pay off their debt is considered forced labor.	<p>Risks Level: Low</p> <p>Mitigation Measures:</p> <p>As the contractors will be encouraged to hire workers from within the communities, to support construction of the civil works, most people within the communities will most likely be unskilled. The contractors must make every effort to avoid forced labor. This will be accomplished by requiring contractors and primary supplier to screen for and avoid engaging forced labor in project work.</p>
Discrimination and exclusion of disadvantaged/vulnerable groups	Vulnerable/disadvantaged people, such as the poor, indigenous peoples, and women, as well as workers with disability, may be excluded from accessing temporary employment opportunities, such as those offered by construction contractors. Unequal wage payment based on gender may happen, particularly with local people working as unskilled workers.	<p>Risks Level: Low</p> <p>Mitigation Measures:</p> <p>Contractors will make every effort to inform local disadvantaged/vulnerable groups about job opportunities, and contractors are also required, through their work contract, to avoid impartial pay based on gender and employment status. Contractors may ask the commune office and/or local mass organizations for their support in making job opportunities timely accessible to vulnerable people.</p>

Hazards and Risks	Description	Hazards and Risks Level before applying Mitigation Measures
Temporary workers	Local people, recruited as unskilled workers by project contractors, may not be offered a written working contract. As a result, there is a possibility that they may be underpaid for the nature, scope, and quantity of work that they undertake. They may also be asked to work under conditions that are hazardous to them, such as working without personal protective equipment as required for such work. Underpayment may also take place based on gender and temporary work status at the discretion of contractors.	<p>Risks Level: Low</p> <p>Mitigation Measures:</p> <ul style="list-style-type: none"> - To address this risk, contractors will be required to sign a contract with temporary workers. The contract will clearly specify the nature and scope of the work, including the number of work hours the workers are expected to work per day, as well as the workload expected based on the temporary workers' physical suitability. - To reduce risk, this requirement will be incorporated into bidding documents and work contracts between the PMUs and awarded contractors.
Unpaid Overtime Work	It is anticipated that working overtime is likely common under the subprojects, particularly when overtime work is required to catch up with delay construction progress, or to complete certain part of the construction before the wet season starts. It is also common that Contractors, including subcontractors, may fail to keep record of their workers' overtime work hours. As result, overtime compensation is not paid, and workers is not aware of their entitlement to overtime payment and claim accordingly.	<p>Risks Level: Moderate</p> <p>Mitigation Measures:</p> <p>When workers are required to work overtime for urgent jobs, the overtime hours shall be paid at the additional 50% of rate for normal hours. If the overtime hours are worked at night or during weekly time off, the rate of increase shall be 100% – as per Article 139 of the Law of Labor.</p>

4. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

The Labor Law (1997) is the regulatory framework with regards to labor and working condition in Cambodia. The Labor Law provides regulations against discrimination, promotes fair treatment and equal opportunity (decent work) in employment and wages, and provides protection and assistance to vulnerable workers. The Labor Law is dedicated to promoting health and safety in the workplace and applicable to anyone who is engaged through working contract.

The following laws and legal documents are related to terms and work conditions, and are applicable to direct, contracted and primary supplier's workers:

- Law on the Prevention of Domestic Violence and the Protection of Victims
- Law on the Protection and Promotion of the Rights of Persons with Disabilities
- Prakas on the Prohibition of Hazardous Child Labor
- Prakas on Light Work
- Law on Social Security Schemes for Persons Defined by the Provisions of the Labor Law (2019)
- Law on the Prevention of Domestic Violence and the Protection of Victims (2005)
- Prakas on Minimum Wage
- Law on Suppression of Human Trafficking and Sexual Exploitation (2008)

Table 3 below summarizes key issues specified in the 1997 Labor Law, covering, *inter alia*, basic wage, payment arrangement and deductions, hours of work, overtime work, rest per week, and leaves (including annual leave, sick leave, maternity, and other personal/family leave...), etc.

Table 4- 1. Key issues of the 1997 Labor Law

Key issues	Relevant Articles in Labor Law 1997	Categories of workers
Basic wage	<p>Article 104: The wage must be at least equal to the guaranteed minimum wage. It must ensure every worker has a decent standard of living compatible with human dignity.</p> <p>Article 105: Any written or verbal agreement that would remunerate the worker at a rate less than the guaranteed minimum wage shall be null and void.</p>	Direct workers, Contracted workers, Primary supply workers
Payment arrangement & deductions	<p>Article 113: The wage must be paid directly to the worker concerned, unless the worker agrees to get paid through other methods.</p> <p>Article 116: Workers' wages shall be paid at least two times per month, at a maximum of sixteen-day interval. Employees' wages must be paid at least once per month. In the event of termination of a labor contract, wage and indemnity of any kind must be paid within forty-eight hours following the date of termination of work.</p> <p>Article 127: None of the balance can be made, in favour of the employer, between the worker's wage and the employer's claim for diverse supplies of whatever kind, except for:</p> <ol style="list-style-type: none"> 1. Tools and equipment required for the work and that are not returned by the worker upon his departure. 2. Items and materials under the control and usage of the worker. 3. Amount advanced to acquire the said items. 4. Amounts owed to the company store. <p>The total amount deducted from the wage, in any case, cannot surpass the portion deemed necessary to provide the basic living for the worker and his family.</p>	Direct workers, Contracted workers, Primary supply workers
Hours of work	Article 137: In all establishments of any nature, whether they provide vocational training, or they are of a charitable nature or liberal profession, the number of hours worked by workers cannot exceed eight hours per day, or 48 hours per week.	Direct worker, Contracted workers, Primary supply
Overtime work	Article 139: If workers are required to work overtime for exceptional and urgent jobs, the overtime hours shall be paid additional 50% of rate for normal hours. If the overtime hours are worked at night or during weekly time off, the rate of increase shall be 100%.	Contracted workers and Primary supply workers
Rest per week	<p>Article 146. It is prohibited from using the same worker for more than six days per week.</p> <p>Article 147: Weekly time off shall last for a minimum of twenty-four consecutive hours. All workers shall be given, in principle, one day off on Sunday.</p>	Direct workers, Contracted workers, Primary supply
Leaves	<p>Article 166: Unless there are more favourable provisions in collective agreements or individual labor contracts, all workers are entitled to paid annual leave at the rate of one and a half a workday as paid leave per month of continuous service.</p> <p>Any worker who has not worked for two continuous months is entitled, at the termination of his labor contract, to compensation for paid leave calculated in proportion to the amount of time he worked in the enterprise.</p> <p>For jobs that are not performed regularly throughout the year, a worker is considered to have met the condition of continuous service if he works on average 21 days per month.</p> <p>Article 170: In principle, annual leave is provided for the Khmer New Year unless there is a different agreement between the employer and the worker. In this case, the employer must inform the Labor Inspector of this arrangement.</p> <p>In case where paid annual leave exceeds fifteen days, employers have the right to grant the remaining days off at another time in the year, except for the leave for children and apprentices who are less than eighteen years of age.</p>	Direct workers, Contracted workers,

5. BRIEF OVERVIEW OF OCCUPATION HEALTH & SAFETY LEGISLATION

5.1 Brief Overview of National Occupation Health & Safety Legislation

The Labor Law includes provisions for occupational health and safety (1997). These provisions are mostly in line with the World Bank's ESS2. The OHS provisions in the Labor Law 1997 establish and enforce standards and regulations to ensure employees work in a safe and healthy environment by. The provisions also define the rights and responsibilities of employers, employees, and other relevant parties in exercising OHS principles and propose measures for prevention of occupational accidents, diseases, and ensure work safety. The Ministry of Labor and Vocational Training has issued the following OHS regulations:

- Prakas No 052 dated 01 February 2000 concerning Sanitary Toilet.
- Prakas No 054 dated 01 February 2000 concerning provision of the Safe Drink.
- Prakas No 124 dated 15 June 2001 concerning Heavy Object Lifting by Hand.
- Prakas No 125 dated 15 June 2001 concerning Air Ventilation and Sanitation.
- Prakas No 138 dated 22 April 2003 concerning Noise at Workplace.
- Prakas No 106 dated 28 April 2004 concerning Prohibition of Children Working in Dangerous Workplace.
- Prakas No 075 dated 30 March 2011 concerning Sanitation at the Construction Site.
- Prakas No 077 dated 30 March 2011 concerning Information at the Construction Site.
- Prakas No 078 dated 30 March 2011 concerning Storage, Waste Management and Cleanliness at Construction Site.
- Prakas No 109 KB/PrK dated 17 March 2016 (Ministry of Labor and Vocational Training) on Healthcare Benefits.

5.2 Brief Overview of International Instruments Cambodia has Ratified

Cambodia is a signatory to all eight of the International Labour Organization (ILO)'s Fundamental Conventions, which underpin the core principles and rights at work. These instruments form the international legal foundation for labor protections under the CSET Project.

Table 5- 1. ILO Conventions Cambodia has Ratified²

N o	Instrument	Subject	Ratification Date
1	Forced Labour Convention, 1930 (No. 29)	Prohibits all forms of forced or compulsory labor	24 Feb 1969
2	Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)	Workers' right to form and join trade unions	23 Aug 1999
3	Right to Organise and Collective Bargaining Convention, 1949 (No. 98)	Protection against anti-union discrimination	23 Aug 1999
4	Equal Remuneration Convention, 1951 (No. 100)	Equal pay for work of equal value	23 Aug 1999
5	Abolition of Forced Labour Convention, 1957 (No. 105)	Prohibits forced labor for political or economic ends	23 Aug 1999
6	Discrimination (Employment and Occupation) Convention, 1958 (No. 111)	Prohibits discrimination in employment and occupation	23 Aug 1999
7	Minimum Age Convention, 1973 (No. 138)	Sets minimum working age (not less than 15 years)	23 Aug 1999
8	Worst Forms of Child Labour Convention, 1999 (No. 182)	Eliminates hazardous and exploitative child labor	14 Mar 2006

6. RESPONSIBLE STAFF

² https://normlex.ilo.org/dyn/nrmlx_en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:103055

6.1 Responsibilities of the PMO of the EDC

As the key project owner, the PMU of the MME and the PMU of the EDC, are responsible for the overall implementation of the LMP. Before the project implementation, EDC will create an PMO under the PMU and ensure that the PMO will carry out day-to-day project implementation and management and that all project workers are recruited and managed in accordance with this LMP's requirements, the Labor Law (1997), and other relevant laws and regulations. Specifically, PMO will engage PIC to:

- Ensure principal contractors and their subcontractor are fully aware of and are committed to implementing all requirements set forth in the project LMP.
- Ensure principal contractors prepare Contract's Labor Management Procedures in compliance with the project LMP and submit to PMO for review and approval prior to mobilizing staff to project site.
- Ensure workers engaged by principal contractors and their subcontractors are fully aware of all requirements described in the Contractor's LMP, particularly requirements related to terms and working condition and complaint handling procedures applicable to project workers.
- Conduct regular monitoring to ensure principal contractors and subcontractors' performance follows the Contractor's LMP, and the Contractor's ESMP and procurement documents.
- Ensure principal contractors and their subcontractors take proactive and appropriate measures to ensure their workers carry out the work safely and without risk to their health.
- Ensure principal contractors and their subcontractors conduct regular risk assessment, provide timely and necessary risks-based trainings to their workers, and provide appropriate supervision to required plans and actions with a view to avoiding or minimize the risks and potential impacts identified in this LMP.
- Ensure principal contractors and their subcontractor address timely their workers' grievances in accordance with the GRM described in Contractor's LMP and establish a safe working environment, free of discrimination and SEA/SH risks, as well as provide appropriate PPE, especially for those conducting site inspections/supervision.

6.2 Responsibilities of PMO's Contractors

The contractors will:

- Develop and implement procedures to establish and maintain a safe working environment at project's construction sites. This includes safe workplaces, safe machinery operation, and equipment to avoid/reduce potential risks to the health and safety of contracted workers, and the general public.
- Actively and regularly train workers to promote workers' understanding and implementation of OHS requirements, including risks related to SEA/SH/VAC, etc.
- For the risk of SEA/SH, all contractors, including subcontractors, must train their female workers, about their rights, including the GRM for SEA/SH, through contractor's training, awareness campaign, and or meetings.
- Ensure training on operational procedures for all project equipment and tools are provided to all workers who will use such equipment and tools.
- Ensure that use of faulty and substandard equipment is avoided.
- Provide laminated signs of relevant safe working procedures in visible areas at construction sites in both English and Khmer languages;
- Provide appropriate PPE to workers.
- Put in place procedures that encourage workers to report work situations that are hazardous or put the health and safety of workers and community members at risk.
- Confirm that workers are properly trained and appropriate measures are in place before mobilizing their workers to communities with potential risk of conflicts.
- Ensure that sufficiently supplied first-aid kits are provided at all construction sites.
- Provide employees with access to toilets and potable drinking water; and
- Properly dispose of solid waste at designated permitted disposal/landfill sites.
- Keep track of and report periodically all responsibilities listed under Section 6.2, as a minimum.
- Ensure their subcontractors manage the E&S risks and impacts associated with subcontractors' activities.

Specifically, the contractors are responsible for the followings:

- **Compliance.** Comply with relevant national legislation as well as requirements set forth in this LMP;
- **Terms and Working Conditions.** Ensure all the workers engaged for the project work are fully aware of terms and working conditions as per Contractor's LMP and fully observe it.
- **Appointment of Staff.** Ensure that key officers in charge of OHS and Work Safety are timely brought on board and satisfactorily identify hazards, assess risks, prepare training curriculum, timely deliver training, and appropriately to ensure workers' full understanding of OHS and Work Safety requirements before workers commence the works.
- **Training of Workers.** Ensure all workers engaged have the right and sufficient skills, knowledge, training, and experience to carry out the work, or are in the process of obtaining them, to meet the work requirements as specified in the Work Contract. Where required by the project, the contractors provide additional training and supervision to ensure workers work safely. Ensure that the training of workers covers key topics that were identified as potential risks to workers and to the general public. These topics may include Environmental, Social, Health and Safety (ESHS), OHS, SEA/SH/VAC, communicable diseases such as HIV/AIDS, non-communicable diseases, as well Individual Code of Conduct (CoC) as specified in the Work Contract with the PMUs.
- **Addressing Workers' Grievances.** The Contractors shall implement the Grievance Redress Mechanism (GRM) for workers as specified in this LMP. The PIC and SEPRO will review the contractors' GRM record monthly. The PIC and SEPRO will ensure that all complaints are resolved in a timely manner in accordance with the procedures outlined in Section 10 of this LMP, and that GRM results are reflected in PMO's quarterly progress reports to the World Bank.
- **Reporting.** Ensure that accidents are reported to PMO on a monthly basis and that serious incidents are reported immediately.

A Contractor's Safety Officer will be responsible for:

- Identifying potential hazards to project workers, particularly those that may be life-threatening.
- Providing preventative and protective measures, including modification, substitution, or elimination of hazardous conditions or substances.
- Training project workers and maintenance of training records.
- Documenting and reporting of incidents.
- Preparing emergency preparedness plan, including response actions for such emergency situations; and
- Providing remedial actions for adverse impacts such as occupational injuries, deaths, disability and diseases.

Contractors will be responsible for the safety of workers and community members in relation to construction activities at the subproject site.

7. POLICIES AND PROCEDURES

The MME and EDC will incorporate all environmental and social requirements in the tender document and contract documents to ensure that potential bidders are aware of environmental and social performance requirements and are able to implement such requirements for the duration of the contract.

The contractor is required to ensure that all documentation related to their environmental and social performance, including activities related to the LMP, are available for inspection at any time by the PMUs. All workers will be trained and will be required to sign an Individual Code of Conduct, including Manager, contractor, and consulting firm as applicable.

- **Occupational Health and Safety (OHS)**

To ensure the safety of workers traveling to remote sites, the OHS strategy will include specific measures, such as:

- (1) requiring only professional drivers to operate project cars and requiring seatbelt use inside of them;
- (2) requiring drivers and passengers to wear helmets when operating project motorcycles, including private motorcycles when used for project-related tasks and avoid travel at night;

- (3) travel by motorcycle for project-related purposes shall be during daytime
- (4) refrain from driving when under the influence of alcohol or any drugs,
- (5) measures to monitor, anticipate and avoid potential security risks while travelling, including liaison with local police and authorities and encouraging project workers to share any concerns they may have.

Project workers in remote areas will receive health and safety training, which will cover topics like preventing infections through contaminated food and/or water and/or through vector-borne diseases as well as avoiding snakebites and insect stings. Site-specific risks will be assessed as part of the ESMP which will include plans for identification of emergency health facilities and emergency evacuation. If required, stocks of snakebite anti-venom will be maintained on hand at project sites. The UXO risks will be assessed for all sites with the assistance of Cambodia Mines Action Centre / Cambodia Mines Action Authority and appropriate risk mitigation measures adopted.

The Health and Safety specifications will include the following provisions:

- Ensuring that health and safety standards at work places are completely compliant with applicable Cambodian laws, including (1) providing all employees with training in basic safety awareness as well as in their terms and working conditions, as a precondition for presence at a construction site; (2) All drivers of vehicles must possess the necessary licenses, and all operators of construction equipment must receive training, including in safety procedures; (3) Safe management of the areas around operating equipment (e.g. turning circle of excavators), including stationing flagmen where necessary; (4) all workers on construction sites to be equipped with helmets, safety boots and protective gloves, depending on site-specific assessment of labour and OHS related risks; (5) secure scaffolding and fixed ladders to be provided for work above ground level; (6) First aid equipment and facilities to be provided in accordance with the Labor Law; (8) at least one supervisory staff member is trained in safety procedures and to be present at all times when construction work is in progress; and (9) adequate provision of hygiene facilities, resting areas, among other things.
- All workplace health and safety incident will be accurately documented in a register that is shared with the supervising engineer. The register should contain the following information: (1) the incident's date, time, and location; (2) its nature; (3) type of injury, and other relevant impacts, including the number of affected workers and others; and (4) the actions that have been taken (first aid, evacuation etc.).
- All workers will be covered by insurance against occupational hazards.
- All work sites have health and safety plans, including identification of potential hazards and actions to be taken in case of emergency, locations prone to accidents, and emergency facilities.
- On-site accommodation must be safe and hygienic. Adequate supply of potable water, washing facilities, sanitation, accommodation, and cooking facilities will be provided. Together with the PIC, the location and design of the site camps will be decided, and a pertinent risk assessment will be conducted.
- Workers residing at site accommodation will receive training in prevention of infections from contaminated food and/or water, vector-borne and sexually transmitted diseases.
- Where contractors hire workers who are local community members, ensure disadvantaged and vulnerable community members have equal access to such work opportunities. Where large numbers of community members are employed, childcare facilities should be provided.
- Employment of people under 18 years of age is prohibited under the project.
- Under no circumstances will contractors, sub-contractors, and primary suppliers engage forced labor.
- Construction materials manufactured in Cambodia shall be procured from suppliers who are able to certify that no forced labor (including debt bondage labor) or child labor (except as permitted by the Labour Law) were involved in the production of the materials.
- All employees must be aware of their rights under the Labor Law.
- All employees will be informed of their ability and rights to file a grievance using the project's GRM for project workers (Section 10.2).
- **Dissemination and Awareness**

The following steps will be carried out by the PMUs during project implementation.

- Key OHS requirements developed under the LMP will be included in Contractor's Bidding Document and Work Contract.
- All Contractors will be required to prepare their own Contractor's-ESMP (C-ESMP) where the Contractor will include the Contractor's LMP to identify/update the risks related to OSH (based on the site condition, their equipment/tools, and their workers' skills and experience, etc.) and propose measures to mitigate such risks.
- C-ESMP will be reviewed by the PIC, SEPRO, and approved by PMO before Contractor is authorized to mobilize staff and their equipment to the construction site.

8. AGE OF EMPLOYMENT

The minimum working age required for the CSET project is 18 years of age. This requirement applies to both national and international workers. Prior to the engagement of labor, workers will be required to provide their identification card or birth certificate for age verification before commencing project related works. In the absence of these official documents, alternative methods could be used to support the age verification, such as a testimony/affidavit from commune level where the potential employee was born, or currently lives. Contractors will check all supporting documents for age verification for their validity. A copy of the document used for age verification will be kept on the Contractor's record.

If Contractor's workers are found to be under 18 years of age, the Contractor is required to stop the work of the worker involved to check Contractor's supporting document about the worker. If the workers are under 18, the Contractor must explain to the workers and ask the worker to stop their work immediately. The Contractor will then agree with the worker on how compensation for the time the worker have spent are paid, including payment of any unpaid overtime work, other benefits, leave balance, etc... The contract should be ceased immediately on the day age verification is completed.

9. TERMS AND CONDITIONS

All terms and conditions outlined in the World Bank's ESS2 (paragraphs 10 to 15) will be adopted and applied to contracted workers. In addition,

- In line with national law, the maximum working hours are limited to 8 hours per day, 6 days per week.
- Employers shall guarantee that the workers receive at least one day of rest per week. Employers shall also decide for the employees to take vacation according to laws during Khmer New Year, Pchum Ben, and any other legal holidays prescribed by the laws and regulations.
- Employment opportunities will be available to all, including equal pay regardless of workers' gender, ethnicity, and employment status.
- The wages to be paid to workers shall not be lower than the local Cambodian minimum wage.
- Relevant provisions in the Labor Law for female workers must be observed, including maternity leave for female workers, where applicable.

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

- Work content (e.g., nature and scope of work).
- Working condition (duration of contract; hours of work, overtime work, place of work, annual leave, sick leave, labor protection measures, etc).
- Remuneration payable (basic wage, bonus, and others).
- Conditions for termination of the employment contract.
- Responsibilities of parties when breaching employment contract.
- Staff regulations and rules, including Individual Code of Conduct on SEA/SH/VAC, etc.
- Disciplinary measures for the violation of Individual Code of Conduct and misconduct.
- Grievance Redress Procedures related Labor and Working Conditions, and SEA/SH.

10. GRIEVANCE REDRESS MECHANISM

The CSET GRM involves a multi-tier structure comprising various actors at the community, institutional, and national levels. Each entity has a defined role in receiving, addressing, resolving, and escalating grievances in accordance with the principles of transparency, timeliness, and accessibility. EDC and MME will establish separate grievance redress mechanisms, tailored to the specific project activities and institutional context of the respective organizations. The tables below summarize the key responsibilities and resolution timelines for all entities involved in the GM process.

Table 10- 1. Roles and Responsibilities of Organizations Involved in EDC's GRM

Stage	Entity	Roles and Responsibilities
First Stage	Village/Commune Chief / Commune Council	<ul style="list-style-type: none"> - Acts as the first point of contact for community members and affected persons. - Receives complaints verbally or in writing, issues receipt, documents and informs to SEPRO
	Contractor	<ul style="list-style-type: none"> - Maintains a contractor-level GRM at each project site. Receives and logs complaints from workers, attempts to resolve issues through negotiation, and forwards unresolved complaints to SEPRO. - Reports all worker grievance cases and resolutions to SEPRO as part of regular reporting.
	PMU (SEPRO -Social, Environment and Public Relations Office)	<ul style="list-style-type: none"> - Receives complaints referred from village/commune chief/ commune councils and contractors. - Responsible for resolving issues through negotiation at the intermediate level. If unsuccessful, forwards cases to the District Office and report to PMU (EDC). - Ensures proper documentation, safeguards compliance, and reporting them to the PMU (EDC).
Second Stage	Project Management Unit (EDC's PMU)	<ul style="list-style-type: none"> - Provides strategic oversight and coordination for the entire project GRM system. - PMU of EDC is supported by project of environment and resettlement and land acquisition (PER&L) through SEPRO. - Escalates unresolved or systemic issues to the Project Steering Committee and includes sensitive cases in reports to the World Bank.
	PMU (SEPRO)	<ul style="list-style-type: none"> - Representatives from SEPRO's Land acquisition compensation and project data management unit coordinates grievance resolution efforts across stakeholders and ensures compliance with project GRM protocols as part of PMU of EDC. - Monitors resolution processes, consolidates grievance data, and ensure enforcement of GRC decisions. - Supports resolution at various stages, maintains grievance records, and facilitates communication with the PMU, SEPRO and Provincial GRC.
	District Office	<ul style="list-style-type: none"> - Receives complaints escalated from SEPRO at 1st stage of GRM. Facilitates negotiation and documentation among stakeholders. If unresolved, refers complaints to the Provincial GRC. Serves as a formal escalation layer in the admin.
Third Stage	Provincial Grievance Redress Committee (GRC)	<ul style="list-style-type: none"> - Composed of Deputy Governor as a Chairperson, other members include representative from different ministries, different communes and villages chiefs involved. - Resolves complex complaints, especially related to land, compensation, or construction nuisances escalated from 2nd stage of GRM. - Issues written decisions and communicates outcomes to complainants.
Fourth Stage	Supreme Court	<ul style="list-style-type: none"> - Resolves the complaints, escalated from 3rd stage of GRM according to the national legislation.

Table 10- 2. Roles and Responsibilities of Organizations Involved in MME's GRM

Stage	Entity	Roles and Responsibilities
First Stage	Policy Bank (SME Bank) PFI (FTB)	<ul style="list-style-type: none"> - Establish internal mechanisms or focal points for addressing grievances related to loan eligibility, disbursement, and financing. Complaints unresolved at 1st stage are referred to the PMU (MME). The policy bank is expected to ensure that their systems align with the broader project GRM principles.
Second Stage	Project Management Unit (MME's PMU)	<ul style="list-style-type: none"> - Provides strategic oversight and coordination for the entire project GRM system. - Responsible for resolving issues through negotiation at the intermediate level. If unsuccessful, forwards cases to the Provincial Court. - E&S focal point from PMU monitors resolution processes, consolidates grievance data from the policy bank. - Escalates unresolved or systemic issues to the Project Steering Committee and includes sensitive cases in reports to the World Bank.
Third Stage	Provincial Court	<ul style="list-style-type: none"> - Resolves the complaints, escalated from 2nd stage of GRM according to the national legislation.

In addition, the Project Steering Committee will serve as the final internal level of grievance review and guide each PMU to address unresolved or high-risk complaints that could impact project legitimacy or safeguard compliance. The committee may escalate to the national court system or engage the World Bank for further guidance on complex or sensitive issues. The committee will ensure alignment with Cambodian law and World Bank ESF.

10.1 EDC's GRM

The GRM follows EDC's existing structure, which enables affected people to submit complaints through the Commune Council, Social, Environment and Public Relations Office (SEPRO), District Office, and Provincial Grievance Redress Committees, before referring unresolved cases to the judicial system if necessary. The grievance procedure includes six stages, as illustrated in Figure 10-1.

Stage 1 – PMU (SEPRO)

- Affected persons or households may submit written or verbal complaints to the PMU (SEPRO) via the Village Leader or Commune Chief, through phone, letter, email, or in-person visit.
- Grievance cases related to land acquisition, the environment issues will be handled by PMU (SEPRO), while other issues (including workers, Indigenous people, agriculture, or others) will be handled by the PMO of the PMU.
- The Village leader /Commune Chief must register the complaint and provide immediate written acknowledgment to the complainant, copying SEPRO.
- SEPRO has 15 days to review and negotiate a solution with the complainant. If unresolved or if the complainant is unsatisfied, the case is elevated to the District Office and report to PMU (EDC).

Stage 2 – District Office

- The District office has 15 days to investigate and mediate the case through various approaches depending on the type of complaints. PMU (SEPRO) will coordinate with district office along the resolving process.
- If the issue cannot be resolved satisfactorily at this level, the complaint is referred to the Provincial GRC along with all supporting documents.

Stage 3 – Provincial Grievance Redress Committee

- The Provincial GRC is Deputy Governor as a Chairperson, other members include representative from different ministries, different communes and villages chiefs involved. Also, the representatives from SEPRO, and other stakeholders such as the Project Implementation Consultant (PIC) will be involved.

- The Committee must meet with the complainant within 15 days of receiving the case and make a written decision within 30 days.
- Copies of the decision are shared with PMU (SEPRO) and the complainant.
- If the complainant does not receive a decision or remains unsatisfied, they may take the case to the Provincial Court.

Stage 4 – Provincial Court

- The Provincial Court reviews the case and issues a written ruling, with copies provided to EDC and the complainant.
- If either party disagrees with the decision, the case may be appealed to the Higher-Level Court which will serve as the final appellate body and its judgment will be final and binding on all parties.

Grievance redress mechanism and information should be well-publicized in the local language (Khmer, via posters or facebook). All grievances will be recorded in a Grievance Register maintained by PMU (SEPRO), with support from the PMO for grievances related to workers, Indigenous Peoples, agriculture, or other non-environmental issues. The PMU (SEPRO) will involve and assist the process of grievance resolution at all stage. The Register will capture key details including the date of receipt, complainant information (if provided), a description of the issue, actions taken, responsible persons or units, and the resolution status. Anonymous complaints will be accepted and handled with equal seriousness, and complainants will not incur any costs for submitting grievances. To ensure transparency and accountability, SEPRO will compile and report regular summaries of grievances received, resolved, and pending as part of EDC's quarterly environmental and social monitoring reports.

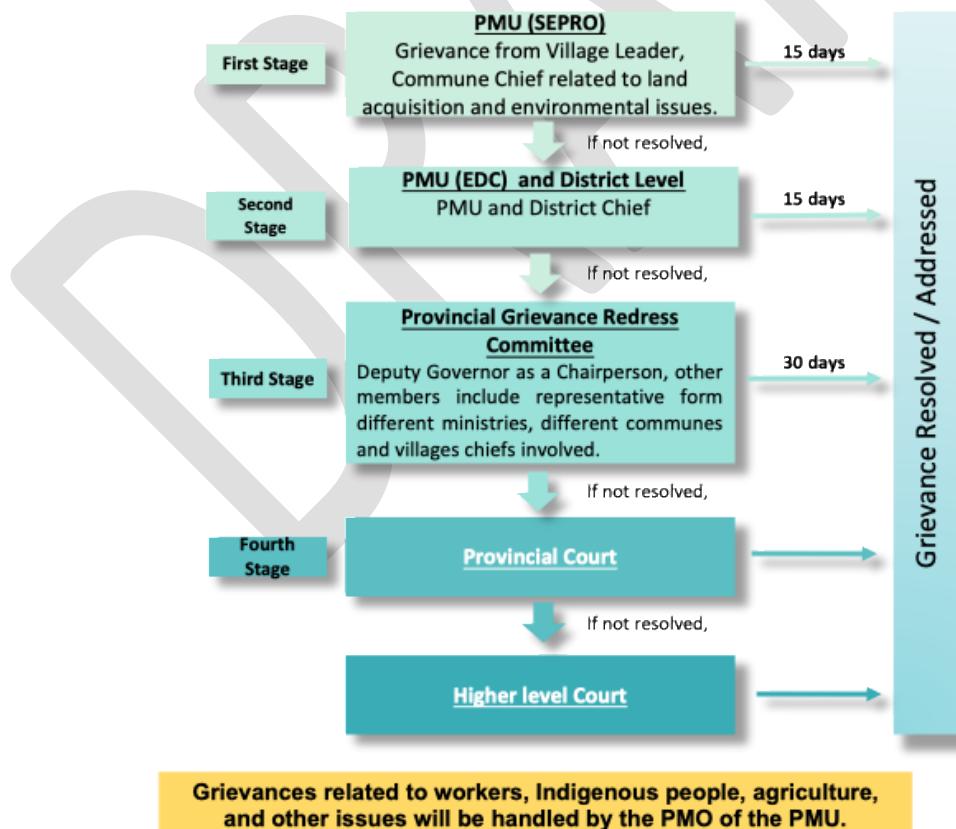


Figure 10- 1.GRM Procedures for EDC

10.2 MME's GRM

The grievance process for Component 2 follows a three-stage mechanism reflecting the roles of the Policy Bank/Participating Financial Institutions (PFI) and the MME PMU. Complaints can be submitted verbally or in writing, and all grievances will be handled confidentially and without cost to complainants. The grievance procedure for MME, as illustrated in Figure 10-2.

Stage 1 – Policy Bank/PFI 's GRM (SEM Bank, FTB)

- Affected industrial enterprises or individuals may submit grievances to the internal grievance mechanism of the Policy Bank or PFI through phone, email, letter, or in-person visit.
- The Policy Bank/PFI must register the complaint and provide immediate written acknowledgment to the complainant.
- The institution has 15 days to review, investigate, and attempt to negotiate a mutually acceptable solution.
- If the complaint is not resolved, or if the complainant is not satisfied with the proposed resolution, the case is elevated to PMU of MME.

Stage 2 – PMU of MME

- PMU (MME) reviews the grievance and seeks resolution through consultation and negotiation within 15 days.
- If the issue remains unresolved after this period, PMU (MME) forwards the grievance to the Supreme Court.
- PMU (MME) also documents and escalates systemic or sensitive issues to the Project Steering Committee and includes them in regular reporting to the World Bank, in accordance with the ESCP.

Stage 3 – Supreme Court

- The Supreme Court reviews the case and issues a written ruling, with copies provided to MME and the complainant.
- If either party disagrees with the decision, the case may be appealed to the Higher-Level Court which will serve as the final appellate body and its judgment will be final and binding on all parties.

All grievances will be recorded in a Grievance Register maintained by E&S focal point of the PMU capturing key details such as the date of receipt, name of the complainant (if provided), description of the issue, actions taken, persons responsible, and the resolution status. Anonymous complaints will be accepted and treated with equal seriousness, and complainants will not incur any costs in submitting their concerns. To ensure transparency and accountability, E&S focal point of the PMU will compile and report regular summaries of grievances received, resolved, and pending as part of the quarterly environmental and social monitoring reports.

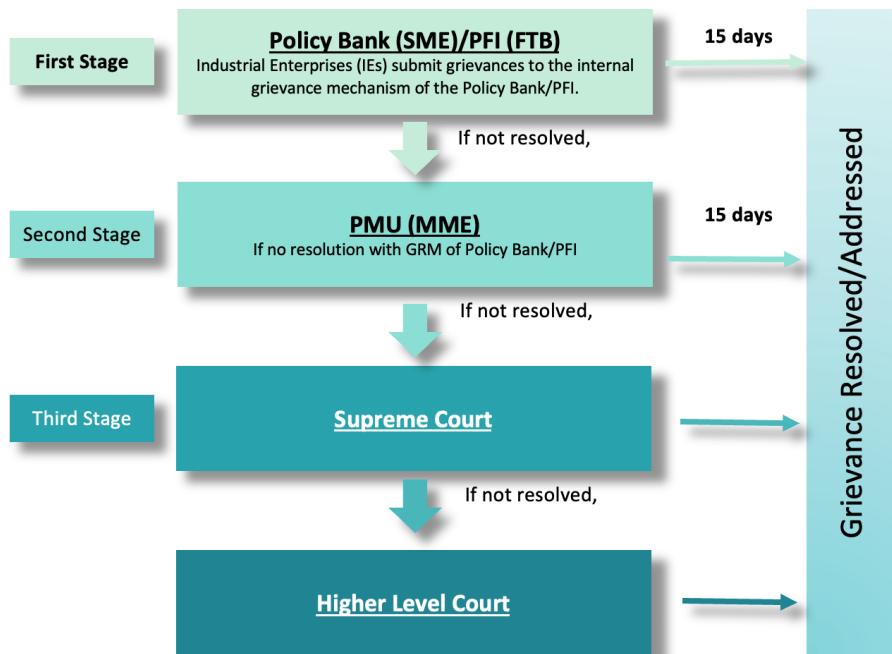


Figure 10- 2. GRM Procedures for MME

The GRM of CSET project will be widely disseminated to stakeholders through commune offices, project information boards, and public consultations, as well as local radio, printed leaflets, and social media platforms through project cycle. Information about the GRM will be provided in Khmer and, where necessary, translated into local or indigenous languages to ensure accessibility for all affected communities.

Moreover, communities and individuals who believe that they are adversely affected by a project supported by the World Bank may submit complaints to existing project-level grievance mechanisms or the Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the Bank's independent Accountability Mechanism (AM). The AM houses the Inspection Panel, which determines whether harm occurred, or could occur, as a result of Bank non-compliance with its policies and procedures, and the Dispute Resolution Service, which provides communities and borrowers with the opportunity to address complaints through dispute resolution. Complaints may be submitted to the AM at any time after concerns have been brought directly to the attention of Bank Management and after Management has been given an opportunity to respond. For information on how to submit complaints to the Bank's Grievance Redress Service (GRS), visit <http://www.worldbank.org/GRS>. For information on how to submit complaints to the Bank's Accountability Mechanism, visit <https://accountability.worldbank.org>.

10.3 Recording Grievances in Logbook

All grievances or feedbacks are solved and recorded in the project grievance logbook by respective PMUs and reported to the Project Steering Committee, which then submits the updates to the World Bank. In case there is serious complaint, such as electric shocks, fire, chemical leakage and SEA/SH cases, etc. the World Bank shall be notified within 24 hours of complaint receipt and/or report on the incidence

11. CONTRACTOR MANAGEMENT

Contractors, including all subprojects, shall execute the management of the contract in a manner that is acceptable to the client and is in accordance with the World Bank rules and regulations as it relates to ESS2, particularly relating to the selection process for contractors, management of labor issues, including health and safety, procedures for managing and monitoring of performance for contractors, as well as reporting on working conditions.

11.1 Contractor Selection

• PREQUALIFICATION

Contractors should be asked to provide details including (but not limited to):

- Past EHS performance; status of ESMS.
- Number and qualifications of ESHS personnel; occupational health and safety procedures and controls.
- HR policies, codes of conduct, and grievance mechanism, including means to address harassment and other forms of GBV plus prior reported incidents of SEA/SH and GBV; and
- Supply chain management as criteria for inclusion on such lists.

The number of documents and level of information and details requested shall be commensurate with the scope of work and other specific features that the contractor is being prequalified against.

• SOLICITATION

The MME and EDC may include the following aspects in their Request For Proposals (RFPs) or other solicitations to prospective contractors:

- Documents showing compliance with in-country ESHS legal requirements.
- E&S policy and other relevant policies, such as those for human resources, anticorruption and bribery, procurement, and stakeholder engagement.
- E&S Requirements that define the main expectations in terms of occupational health, safety, E&S, and community aspects.
- Solicitations should request an affirmative statement or other commitment by prospective contractors that they will be responsible for E&S performance of their subcontractors and suppliers.
- Other governance frameworks or industry standards that may apply.

11.2 Project Performance

During construction, contractors are required to:

- Monitor, keep records, and report on terms and conditions related to labor management.
- Provide workers with evidence of all payments made, including benefits and any valid deductions.
- Keep records regarding labor conditions and workers engaged under the Project, including contracts, registry of induction of workers including Code of Conduct, hours worked, remuneration and deductions (including overtime).
- Record safety incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, etc.).
- Report evidence that no child labor is involved.
- Training/induction dates, number of trainees, and topics.
- Details of any worker grievances including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken. Grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.
- Apply penalties and/or incentives for E&S performance of contractors and subcontractors.
- Sign the Manager's Code of Conduct and Individual Code of Conduct, as applicable.

The PIC and SEPRO are in charge of managing and supervising contractor performance in accordance with PMO's contract with contractors. The PIC and SEPRO is specifically responsible for overseeing the implementation of labor-related provisions outlined in the Contractor's work contract, project's LMP, and Contractor's LMP (Appendix 4).

11.3 Subcontractors

It may be more challenging for the PIC and SEPRO to manage the E&S performance of subcontractors who are "third parties" engaged by main contractors to provide services such as transport, construction of certain

parts of the transmission line and substations, or other specialty services. The following arrangements shall be followed:

For main contractors. Main contractors who sign contract with the PMUs will be held accountable by the Employer to:

- Use their direct control over their contractors to ensure that E&S requirements are being met by subcontractors.
- On a daily basis, monitor not only their own E&S performance but also that of all its subcontractors throughout mobilization, the main construction phase, operation, and demobilization.
- As part of main contractor's E&S management plan, submit the information/data that the main contractor required its subcontractors to report in subcontractors' regular report (weekly, monthly, quarterly).
- Ensure that remedial action is taken in the event of any non-compliance with ES requirements in the work of subcontractors.

For PMO, the PMO will

- Conduct regular meetings with main contractors, and between contractors and their subcontractors to ensure performance of both main contractor and subcontractors is satisfactory and that project specifications are being met.
- Require main contractors to provide an organization chart illustrating reporting lines on E&S and subcontractors for contract negotiations and may be later included in contract documentation.

12. PRIMARY SUPPLY WORKERS

Given the nature and scope of the project's civil works may require the supply of construction materials such as aggregates, cement, and miscellaneous materials.

Some contractors may be able to produce some of the construction materials using their own workforce. However, where the contractors procure 1) essential materials, 2) directly from primary suppliers for the core functions of the project, and 3) on an ongoing basis, the workers engaged by such primary suppliers are considered "primary supply workers" as defined in the World Bank's ESS2. As discussed in Section 3. Key Labor Risks, the OHS risks are also deemed to be generally significant in the construction sector, including quarry sites where no functioning labor inspection mechanism is in place. To address these potential risks, the following measures will be taken:

• Selection of primary suppliers

Before purchasing materials from a primary supplier, contractors must conduct due diligence on potential primary suppliers (those providing key materials for construction, particularly raw materials) to ensure that no forced or child labor is involved in activities that produce materials for project use. The contractor should conduct due diligence by:

- Informing the Primary Supplier that the Contractor will not enter into contract with any primary suppliers that engage forced labor or child labor.
- When possible, visiting the company/factory, and interview key personnel about their working conditions, as well as conduct informal, random interviews with workers.
- Conducting secondary due diligence by collecting information from other parties who may be familiar with the primary suppliers. This is to make sure there are no reported instances of forced or child labor.
- If necessary and whenever possible, engaging the Ministry of Labor and Vocational Training to conduct due diligence on the potential supplier(s) to verify there are no instances of child labor or forced labor;
- Preparing due diligence reports and submit to the MME or the EDC.

- Including specific requirements on child labor, forced labor, and work safety issues in all purchasing contracts with primary suppliers.

- **Remedial process**

When the supply of materials is in progress, if child labor, forced labor, and/or serious safety incidents involving primary supply workers are discovered, the MME or the EDC will require the contractor to request that their primary supplier take the necessary corrective actions. Contractors will periodically check on the implementation of mitigation measures to make sure the primary supplier's corrective actions are on track. If the mitigation measures are found to be ineffective, the MME or the EDC will demand that the Contractors switch to other qualified primary suppliers within a reasonable amount of time.

DRAFT

Appendix 1. Worker's Code of Conduct

The Appendix has two Worker's Code of Conduct (COC). The first is for ESHS and SEA/SH/VAC, and the second is for working with local Ethnic Communities.

1.1 Code of Conduct related to ESHS and SEA/SH/VAC

Instructions: This Code of Conduct should be included in bidding documents for the civil works contractor(s) and in their contracts once hired. This Code of Conduct should also be included in bidding documents, and the contracts, of MME's and EDC's Consultant. This Code of Conduct is to be signed by all contractor and Consultant staff, including managers, working under CSET.

I, _____, acknowledge that adhering to environmental, social, health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and prevention of Sexual Exploitation & Abuse (SEA)/Sexual Harassment (SH), are important.

I understand that that failure to follow ESHS and OHS requirement, or to partake in activities constituting SEA/ SH -- be it at the project site, the surrounding area of the project site, workers' camps, or the project communities, including community members and project workers, constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution by the Police of those who commit SEA/SH may be proceeded as applicable under relevant Laws.

I agree that while working on the project, I will:

- Carry out my duties competently and diligently.
- Comply with this Worker's Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other project workers, and any other person and community members.
- Maintain a safe working environment including by:
 - Ensure that workplaces, machinery, equipment and processes under each person's control are safe and without minimal risk to health and safety of those involved.
 - Use appropriate measures relating to chemical, physical and biological substances and agents; and
 - Follow applicable emergency response procedures.
- Report works situations that I believe unsafe or unhealthy to either project workers and/or community and remove myself and inform those relevant to remove themselves from a work situation which I reasonably believe imminent and dangerous to safety, life and health of those involved.
- Consent, if required, to a background check in any place I have worked for more than six months.
- Attend and actively partake in training courses related to ESHS, OHS, SEA/SH and VAC, as requested by my employer.
- Always wear my personal protective equipment (PPE), as required while at work or engaged in project related activities.
- Take all practical steps to implement the ESMP, which may include OHS Management Plan.
- Abide by a zero-tolerance policy as to SEA/SH/VAC and alcohol consumption during work activities, and refrain from use of narcotics or other substances which can impair worker's expected working ability and judgement.
- Respect women, children (persons under 18 years of age), and the elderly regardless of their ethnic background, language, religion, personal opinions, disability, and/or other socioeconomic status.
- Shall not use language or behavior that are inappropriate to community members and project workers, particularly women, children, and the elderly,

- Shall not commit any sexual abuse and or exploit, and/or sexual harassment of any kinds to community members in the project area and any project workers.
- Shall not engage in sexual harassment of project personnel and staff — for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature (looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts).
- Shall not engage in offering any work-related favors such as making promises of favorable treatment (i.e. promotion), or make threats of unfavorable treatment (i.e. loss of job), or make payments in kind or in cash depending on sexual acts — or other forms of humiliating, degrading or exploitative behavior.
- Shall not engage in using prostitution service, and/or hospitality services that may engage labor under 18 years of age -- in any form and at any time during project implementation.
- Shall not participate in sexual contact or activity with children under 18 years of age —including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not considered a defense or excuse.
- Consider reporting through the project's GRM, or to my manager, any suspected or actual SEA/SH deed by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.
- Complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, and Sexual Exploitation & Abuse, Sexual Harassment, and Violence Against Children (VAC).
- Report violations of this Code of Conduct; and

With respect to children under the age of 18:

- Bring to the attention of my manager the presence of any children on the construction site.
- Wherever possible, ensure that another adult is present when working in proximity to children.
- Shall not invite unaccompanied children unrelated to my family into my home unless they are at immediate risk of injury or in physical danger.
- Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also “Use of children's images for work related purposes” below).
- Avoid, in all circumstances, any verbale and/or physical punishment or discipline of children.
- No hiring of children (under 18) in any project activity.
- Comply with all relevant local regulations, including labor law in relation to child labor and forced labor.
- Take appropriate caution when photographing or filming children (see also section below). Photos or films of children should generally not be taken under the project, except for instance:

Use of children's images for work related purposes

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

- Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
- Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this, I must explain how the photograph or film will be used.

- Ensure photographs, films, videos present children in a dignified and respectful manner and not in a manner that is vulnerable or submissive. Children should be adequately dressed up and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file labels do not reveal identifying information about a child when sending images electronically.

Raising Concerns

If any person observes behavior that I believe may represent a violation of this Code of Conduct, or that otherwise concerns me, I will raise the issue promptly. This can be done in either of the following ways:

1. Contact [enter name of the Employer's Social Focal Point] to handle these incidences.
2. Call Employer's telephone.

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

Sanctions

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

- Informal warning.
- Formal warning.
- Additional Training.
- Termination of employment.
- Report to the Police if warranted.

I understand that it is my responsibility to:

Ensure that the Environmental, Social, Health and Safety requirements are met.

Adhere to the Occupational Health and Safety Management Plan

Avoid actions or behaviors that could be construed as SEA/SH/VAC. Any such actions will be a breach to this Workers' Code of Conduct.

I hereby acknowledge that I have perused the foregoing part of this Workers' Code of Conduct, agree to comply fully with the requirements contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, SEA/SH/VAC issues. I understand that any actions that are inconsistent with this Workers' Code of Conduct, or failure to act as mandated by this Workers' Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

1.2 Code of Conduct for Working with Local Ethnic Communities

This Code of Conduct is grounded on the Objectives of the WB's ESS7, which are:

- To ensure that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples.
- To avoid adverse impacts of projects on Indigenous Peoples, or when avoidance is not possible, to minimize, mitigate and/or compensate for such impacts.
- To promote sustainable development benefits and opportunities for Indigenous Peoples in a manner that is accessible, culturally appropriate and inclusive.
- To improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with the Indigenous
- To recognize, respect and preserve the culture, knowledge, and practices of Indigenous Peoples, and to provide them with an opportunity to adapt to changing conditions in a manner and in a timeframe acceptable to them.

I hereby acknowledge that I have perused the foregoing part of this Workers' Code of Conduct for working with local ethnic communities, agree to comply fully with the requirements contained therein. I understand that any actions that are inconsistent with this Workers' Code of Conduct, or failure to act as mandated by this Workers' Code of Conduct may result in disciplinary action and may affect my ongoing employment.

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

Appendix 2. Manager's Code of Conduct/Contractor's Code of Conduct/Consulting Firm's Code of Conduct

Instructions: This Code of Conduct should be included in bidding documents for the civil works contractor(s) and in their contracts once hired. This Code of Conduct should also be included in bidding documents, and the contracts, of MME's and EDC's Consultants. This Code of Conduct is to be signed by the main party (head or manager) in the Contractor/Consultant.

Manager's Code of Conduct

The contractor is committed to ensuring that the project is implemented in such a way which minimizes any negative impacts on the local environment, communities, and its workers. This will be done by respecting the environmental, social, health and safety (ESHS) standards, and ensuring appropriate occupational health and safety (OHS) standards are met. The contractor is also committed to creating and maintaining an environment where children under the age of 18 will be protected, and where sexual abuse and sexual harassment have no place. Improper actions towards children, Violence against Children (VAC), and/or Sexual Exploitation and Abuse/Sexual Harassment (SEA/SIH) will not be tolerated by any employee, sub-contractors, supplier, associate, or representative of the company.

Staff at all levels have a responsibility to uphold the contractor's commitment after they have read and acknowledged the commitment. Contractors need to support and promote the implementation of the Workers' Code of Conduct. To that end, staff must adhere to and sign the Workers' Code of Conduct. This commits them to supporting the implementation of the Contractor's Environmental and Social Management Plan including the OHS and SEA/SIH mitigation measures.

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

Implementation

- a. To ensure maximum effectiveness of the Code of Conduct:
 - (i) Prominently displaying the Code of Conduct in clear view at workers' camps, offices, and in public areas of the workspace. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.
 - (ii) Ensuring all posted and distributed copies of the Code of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.
- b. Verbally and in writing explain the Code of Conduct to all staff, including in an initial training session.
- c. Ensure that:
 - (i) All staff sign the 'Workers' Code of Conduct', including acknowledgment that they have read and agree with the Code of Conduct.
 - (ii) Staff lists and signed copies of the Workers' Code of Conduct are provided to the OHS Manager and the PMU'S SEO.
 - (iii) Participate in training and ensure that staff also participate as outlined below.
 - (iv) Put in place a mechanism for staff to:
 - report concerns on ESHS or OHS compliance; and,
 - confidentially report SEA/SIH incidents through the Grievance Redress Mechanism (GRM)
 - (v) Staff are encouraged to report suspected or actual ESHS, OHS, SEA/SIH, VAC issues, emphasizing the staff's responsibility in compliance with applicable laws and to the best of your abilities, prevent perpetrators of sexual exploitation and abuse from being hired, re-hired or deployed.
- d. Ensure that when engaging in partnership, sub-contractor, supplier or similar agreements, these agreements:

- (i) Incorporate the ESHS, OHS, SEA/SH, VAC Codes of Conduct as an attachment.
- (ii) Include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers, to comply with the Workers' Codes of Conduct.
- (iii) Expressly state that the failure of those entities or individuals, as appropriate, to ensure compliance with the ESHS and OHS standards, take preventive measures Against SEA/SH and VAC, to investigate allegations thereof, or to take corrective actions when SEA/SH or VAC has occurred, shall not only constitute grounds for sanctions and penalties in accordance with the Workers' Codes of Conduct but also termination of agreements to work on or supply the project.

- e. Provide support and resources to the E&S team to create and disseminate staff training and awareness-raising strategy on SEA/SH, VAC and other issues highlighted in the ESMP.
- f. Ensure that any SEA/SH or VAC complaint warranting Police action is reported to the Police, the client and the World Bank immediately.
- g. Report and act in accordance with the agreed response protocol any suspected or actual acts of SEA/SH or VAC.
- h. Ensure that any major ESHS or OHS incidents are reported to the client and the supervision engineer immediately, non-major issues in accordance with the agreed reporting protocol.
- i. Ensure that children under the age of 18 are not present at the construction site or engaged in any hazardous activities.

Training

- j. The managers are responsible to:
 - (i) Ensure that the OHS mitigation measures is implemented, with suitable training required for all staff, including sub-contractors and suppliers; and,
 - (ii) Ensure that staff have a suitable understanding of the ESMP and are trained as appropriate to implement the Contractor's ESMP requirements.
- k. All managers are required to attend an induction manager training course prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding the SEA/SH and VAC elements of these Codes of Conduct. This training will be separate from the induction training course required of all employees and will provide managers with the necessary understanding and technical support needed to begin to develop the SEA/SH Action Plan for addressing SEA/SH issues.
- l. Managers are required to attend and assist with the project facilitated monthly training courses for all employees.
- m. Ensure that time is provided during work hours and that staff prior to commencing work on site attend the mandatory project facilitated induction training on:
 - (i) OHS and ESHS, and,
 - (ii) SEA/SH and VAC.
- n. During civil works, ensure that staff attend ongoing OHS and ESHS training, as well as the monthly mandatory refresher training course required of all employees on SEA/SH.

Response

- o. Managers will be required to take appropriate actions to address any ESHS or OHS incidents.
- p. Regarding SEA/SH:

- (i) Maintain the confidentiality of all employees who report or (allegedly) perpetrate incidences of SEA/SH (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law).
- (ii) If a manager develops concerns or suspicions regarding any form of SEA/SH by one of his/her direct reports, or by an employee working for another contractor on the same work site, s/he is required to report the case using the GRM.
- (iii) Once a sanction has been determined by the GRM, the relevant manager(s) is/are expected to be personally responsible for ensuring that the measure is effectively enforced, within a maximum timeframe of 14 days from the date on which the decision to sanction was made by the GRM.
- (iv) If a Manager has a conflict of interest due to personal or familial relationships with the survivor and/or perpetrator, he/she must notify the Company and the GRM. The Company will be required to appoint another manager without a conflict of interest to respond to complaints.
- (v) Ensure that any SEA/SH issue warranting Police action is reported to the Police, the client and the World Bank immediately.

q. Managers failing address ESHS or OHS incidents or failing to report or comply with the SEA/SH provisions may be subject to disciplinary measures, to be determined and enacted by the Company. Those measures may include:

- (i) Informal warning;
- (ii) Formal warning;
- (iii) Additional Training;
- (iv) Loss of up to one week's salary;
- (v) Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months;
- (vi) Termination of employment.

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

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

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Appendix 3. Reportable Incidents

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

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

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

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

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

Child Labor: An incident of child labor occurs: (i) when a child under the age of 14 (or a higher age for employment specified by national law) is employed or engaged in connection with a project, and/or (ii) when a child over the minimum age specified in (i) and under the age of 18 is employed or engaged in connection with a project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.

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

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

Discrimination based on SOGI: Discrimination means creating a distinction, exclusion, or restriction which has the purpose or effect of impairing or excluding a person based on their real or perceived sexual orientation, gender identity, gender expression, or sex characteristics from being on an equal basis with others.

Sexual Exploitation: Any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. In Bank financed operations/projects, sexual exploitation occurs when access to or benefit from a Bank financed Goods, Works, Non-consulting Services or Consulting Services is used to extract sexual gain.

Sexual Abuse: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. In Bank financed operations/projects, sexual abuse occurs when a project related worker (contractor staff, subcontractor staff, supervising engineer) uses force or unequal power vis a vis a community member or colleague to perpetrate or threat to perpetrate an unwanted sexual act.

Sexual Harassment: Any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment. In Bank financed operations/projects, sexual harassment occurs within the context of a subcontractor or contractor

and relates to employees of the company experiencing unwelcome sexual advances or requests for sexual favor or acts of a sexual nature that are offensive and humiliating among the same company's employees.

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

For environmental and social incidents

4.A. Form to be completed by PMU within 24 hours

B1: Incident Details			
Date of Incident:	Time:	Date Reported to PMO:	Date Reported to WB:
Reported to PMO by:	Reported to WB by:	Notification Type: Email/'phone call/media notice/other	
Full Name of Main Contractor:		Full Name of Subcontractor:	
B2: Type of incident (please check all that apply) ¹			
<input type="checkbox"/> Fatality <input type="checkbox"/> Lost Time Injury <input type="checkbox"/> Displacement Without Due Process <input type="checkbox"/> Child Labor <input type="checkbox"/> Acts of Violence/Protest <input type="checkbox"/> Disease Outbreaks <input type="checkbox"/> Forced Labor <input type="checkbox"/> Unexpected impacts on heritage resources <input type="checkbox"/> Unexpected impacts on biodiversity resources <input type="checkbox"/> Environmental pollution incident <input type="checkbox"/> Workplace incidents <input type="checkbox"/> Other			
B3: Description/Narrative of Incident			
<p>For example:</p> <ol style="list-style-type: none">I. What is the incident?II. What were the conditions or circumstances under which the incident occurred (if known)?III. Are the basic facts of the incident clear and uncontested, or are there conflicting versions? What are those versions?IV. Is the incident still ongoing or is it contained?V. Have any relevant authorities been informed?			
B4: Actions taken to contain the incident			
Short Description of Action	Responsible Party	Expected Date	Status
<p>For incidents involving a contractor:</p> <p>Have the works been suspended under Contract? Yes <input type="checkbox"/>; No <input type="checkbox"/>;</p> <p>Name of Contractor:</p>			

B5: What support has been provided to affected people**4.B. Form to be completed by PMU (following investigation)****C3a: Fatality/Lost time Injury information**

Cause of fatality/injury for worker or member of the public (please check all that apply):

1. Caught in or between objects 2. Struck by falling objects 3. Stepping on, striking against, or struck by objects 4. Drowning 5. Chemical, biochemical, material exposure
6. Falls, trips, slips 7. Fire & explosion 8. Electrocution 9. Homicide 10. Medical Issue 11. Suicide 12. Others *Vehicle Traffic:* 13. Project Vehicle Work Travel 14. Non-project Vehicle Work Travel 15. Project Vehicle Commuting 16. Non-project Vehicle Commuting 17. Vehicle Traffic Accident (Members of Public Only)

Name	Age	Date of Death/Injury	Gender	Nationality	Cause of Fatality/Injury	Worker (Employer)/Public

C3b: Financial Support/Compensation Types

1. Contractor Direct 2. Contractor Insurance 3. Workman's Compensation/National Insurance
4. Court Determined Judicial Process 5. Other 6. No Compensation Required

Name	Compensation Type	Amount (US\$)	Responsible Party

C4: Supplementary Narrative

For SEA/SH Incident

4.C. Incident Form for SEA/SH (to be completed by PMU within 24 hours)

B1: Incident Details		
Date of incident intake by the project/GM:	Date Reported to PMO:	Date Reported to WBG:
Reported to project/GM by: <input type="checkbox"/> Survivor <input type="checkbox"/> Third party <input type="checkbox"/> Other: _____	Reported to PMO by: <input type="checkbox"/> GM operator <input type="checkbox"/> Directly, by Survivor <input type="checkbox"/> <input type="checkbox"/> Directly, by third party <input type="checkbox"/> Other: _____	Reported to WBG by: <input type="checkbox"/> PIU <input type="checkbox"/> Directly, by Survivor <input type="checkbox"/> <input type="checkbox"/> Directly, by third party <input type="checkbox"/> Other: _____
Is a record of this incident in GM? Yes <input type="checkbox"/> No <input type="checkbox"/>		
B2: Incident type (please check all that apply)		
Sexual exploitation <input type="checkbox"/> Sexual abuse <input type="checkbox"/> Sexual harassment <input type="checkbox"/>		
B3: Provide the following details from the GM record		
Age of survivor (if recorded in GM):	Have the national legislation or mandatory reporting requirements been followed? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Sex of survivor (if recorded in GM): Male <input type="checkbox"/> Female <input type="checkbox"/> Other <input type="checkbox"/>	Was the survivor referred to service provision? ²⁹ Yes <input type="checkbox"/> No <input type="checkbox"/>	
Is the survivor employed by the project (as indicated by the survivor or complainant and reported in the GM)? Yes <input type="checkbox"/> No <input type="checkbox"/>	Is the alleged perpetrator employed by the project (as indicated by the survivor or complainant and reported in the GM)? Yes <input type="checkbox"/> No <input type="checkbox"/>	
B4: Basis for further action		
a. Has the complainant provided informed consent to lodge a formal complaint? Yes <input type="checkbox"/> No <input type="checkbox"/>	c. Has the survivor provided informed consent to be part of an investigation into misconduct? Yes <input type="checkbox"/> No <input type="checkbox"/>	
b. Does the employer have a suitable administrative process and capacity in place to investigate misconduct relating to SEA/SH in a survivor-centered way? Yes <input type="checkbox"/> No <input type="checkbox"/>	d. Has the complaint been filed anonymously or through a third party? Yes <input type="checkbox"/> No <input type="checkbox"/>	
If the answer to any of these questions is no, has the GM assessed the risks and benefits of carrying out an investigation into the alleged misconduct, taking into account the survivor's safety and wellbeing? Yes <input type="checkbox"/> No <input type="checkbox"/>		

Will an investigation into misconduct be undertaken in addition to an investigation into adequacy of project systems, processes or procedures? Yes No

DRAFT

Appendix 4. Outline for Contractor's LMP

Contractor's Labor Management Plan

1. Project Information

- 1.1 Project Description
- 1.2 Objectives of the Contractor's LMP

2. Labor Management Plan

2.1 Workforce Management

(The workforce management shall include, but not limited to, profile of workforce – work activities, schedule, contract duration, workforce rotation plan, workers camp, measures to prevent or mitigate sexual transmission disease, contingency plan including pre-health checkup, access restrictions, hygiene, waste management, accommodation arrangements, and personal protection equipment provision and usage, reporting and handling of issues etc.)

2.2 Occupational Health, Safety, and Emergency Management

(The Occupational Health, Safety, and Emergency Management shall include, but not limited to, list of work locations, hazards/risks with PPE requirement and numbers, lists of tasks and work zone critical for hazard prevention, location of warning signage for hazard prevention, requirement of first aid kits and fire extinguisher – task and location wise, key person(s) to be contacted during emergency, protocol for deciding the level of emergency – need for hospitalization, information to authorities, process of accident analysis, corrective and preventive measures and need for reporting, etc.)

2.3 Preventive Measures on SEA/SH

(The preventive measures on SEA/SH shall include, but not limited to, provision of lighting, separate toilet areas for men and women, increased vigil and security arrangement for community sensitive hotspots on SEA/SH (if identified), sensitizing and awareness raising of labor on SEA/SH issues including penalties and legal action against offenders, awareness raising on GRM, etc.)

2.4 Worker's Code of Conduct

(The worker's code of conduct (CoC) shall include, but not limited to, the preparation of Code of Conduct, making labor aware of conduct with all the provisions DO's and DON'Ts, penalties for non-compliance, displaying of CoC at prominent locations, and signing of Code of Conduct by workers before starting the work, etc.)

2.5 Training and Awareness Raising

(The training and awareness raising shall include, but not limited to, plan for training and awareness covering pollution prevention, occupational health and safety, use of PPEs, accident reporting and emergency management, CoC, SEA/SH, GRM, etc.)

2.6 Worker's Grievance Redress Mechanism

(The worker's grievance redress mechanism shall include, but not limited to, details of GRM and contacts, process of receiving, redressing, escalation, reporting back, consolidated statement on grievance, and contacts of nearest labor offices of the Department of Labor of the Ministry of Labor and Vocational Training.)

3. Budgets for implementing Contractor's LMP

Annex. Worker's Code of Conduct