



GOVERNMENT OF LIBERIA



Ministry of Gender, Children and Social Protection
Ministerial Complex
Congo Town, Monrovia

Liberia Women Empowerment Project (LWEP)
(P173677)

LABOUR MANAGEMENT PROCEDURES (LMP)

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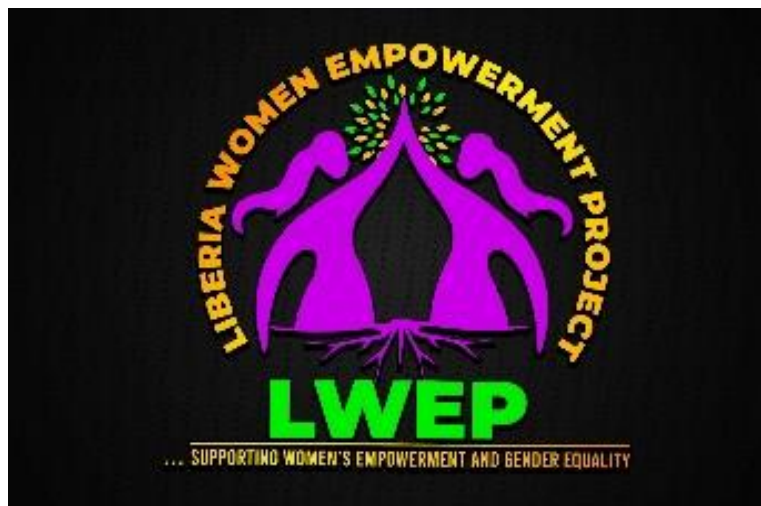


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LIST OF ACRONYMS

AS	Analytical Study
CBL	Central Bank of Liberia
CCB	Climate Co-Benefit
CCCV	Code of Conduct Corona Virus-19
CERC	Contingent Emergency Response Component
COD	Code of Conduct
CPF	Country Partnership Framework
DFS	Digital Financial Services
ESCP	Environmental Social Commitment Plan
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environment and Social Standard
GBV	Gender-Based Violence
GOL	Government of Liberia
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
IFC	International Finance Corporation
IGRMC	Institutional Grievance Redress Management Committee
LBR	Liberia Business Registry
LMP	Labour Management Procedures
LSP	Lead Service Provider
LWEP	Liberia Women Empowerment Project
MGCSP	Ministry of Gender, Children and Social Protection
MOA	Ministry of Agriculture
OHS	Occupational Health and Safety
PMU	Project Management Unit
VSLA	Village Saving Loan Associations
WB	World Bank
WGRMC	Workers Grievance Redress Management Committee

EXECUTIVE SUMMARY

This Labour Management Procedure (LMP) is intended to provide the framework to address the specific labor-related risks and impacts that are anticipated to occur as a result of the implementation of the Liberia Women Empowerment Project (LWEP). The objective of the LWEP is to improve social and livelihood services for women and girls in targeted communities, foster positive social norms, and strengthen the government's capacity to advance women and girls' empowerment. The project has six (6) components namely:

- Component 1: Fostering positive social norms and community mobilization
- Component 2: Enhancing basic services in health and education
- Component 3: Promoting resilient livelihoods through community-based approaches
- Component 4: Strengthening public institutions to advance gender equality
- Component 5: Project management and knowledge management
- Component 6: Contingent emergency response component

The LMP has been developed to protect the health, safety, rights, and well-being of project workers who will be engaged during the implementation of the LWEP Project. It is also intended to promote equal opportunity and non-discrimination in the management of the workforce taking into consideration both national and international labour requirements including the World Bank's Standard on Labour and Working Conditions (Environment and Social Standard: ESS 2 and ESS 4) and the Liberia Decent Work Act of 2015 which is intended to protect workers and their organizations against anti-union discrimination at the time of recruitment and during employment and give effect to its human rights and ILO obligations. It is also intended to address discrimination against women in working conditions.

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

in the following manner:

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

The objectives of the labour management procedures are to:

- Promote safety, good health and employee welfare of project workers;

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

The project workers will be categorized as direct workers, contract workers, community workers, marginalized workers, and primary supply workers in accordance with the ESS 2 and the Liberia Decent Work Act 2015.

The anticipated labour risks of the project include:

- Occupational risks and hazards (incidents and accidents);
- Risk of Contracting other diseases and COVID-19;
- Labour influx and associated Gender-Based Violence (GBV)/SEA/SH;
- Risk of contracting HIV and AIDS and other STIs -Risk extended to both workforce and local community;
- Child labour in the project workforce or in the family of marginalized workforce or community workers as an unintended consequence of engaging vulnerable women for work which could lead to changes in household dynamics and decisions on how children should spend their time (e.g., to replace adult women in doing household chores);
- Noncompliance with country labour laws;
- Poor conditions of service; and
- Discrimination and exclusion of women and other vulnerable groups which the LWEP intends to narrow its gaps.

The main procedures for the project labour management will focus on definition and verification of:

- Terms and Conditions of Employment
- Standards for Non-discrimination and Equal Opportunity for all workers
- Rights for Workers organization

Workers' age to ensure compliance with minimum age of employment

- Occupation health and safety standards
- Contractor management
- Primary supply worker management
- Establishment of a workers and working condition-based Grievance Redress Mechanisms

The LMP includes detailed descriptions of how project-related grievances will be resolved. The grievance redress mechanism shall contribute to the efficient running of the project activities as it shall assist in investigating complaints and provide a fair and speedy redress to affected parties/beneficiaries. There will be specific procedures for addressing GBV/SEA/SH and other child protection concerns, such as child labour, including confidential reporting with safe and ethical documentation of GBV cases guided by the GBV Referral Protocol. Multiple channels will be put in place for lodging a complaint in connection to GBV/SEA/SH/ child protection and child labour cases consistent with the projects SEA/SH, Child Protection/Child Labour action plan.

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

1.0. INTRODUCTION

This Labour Management Procedure (LMP) is intended to provide the framework to address the specific labour-related risks and impacts that are anticipated to occur as a result of the implementation of the Liberia Women Empowerment Project. This LMP sets out a formal system by which the Ministry of Gender, Children and Social Protection (MGCSP), together with other stakeholders which include the Lead Service Provider (LSP) and sub-project contractors, will manage labour-related risks and implement mitigation measures that will avoid or reduce the significance of labour related impacts on workers, community health, safety, and security. The LMP sets out the Program's approach to meeting national requirements as well as the objectives of the World Bank's Environmental and Social Framework, specific objectives of Environmental and Social Standard 2: Labour and Working Conditions (ESS2) and Standard 4: Community Health and Safety (ESS4). This LMP will further be updated in a plan by the subproject contractors during implementation.

1.1 PURPOSE AND SCOPE OF THE LABOUR MANAGEMENT PROCEDURE

The LMP has been developed with the purpose of protecting the health, safety, rights, and wellbeing of project workers who will be engaged during the implementation of the LWEP. It is also intended to promote equal opportunity and non-discrimination in the management of the workforce taking into consideration both national and international labour requirements including the World Bank's Standard on Labour and Working Conditions (Environment and Social Standard: ESS 2 and ESS 4) and the Decent Work Act of 2015.

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

1.2. OBJECTIVES OF THE LMP

This LMP is developed taking into consideration ESS 2 which specifies the requirements for the management of labour and working conditions and the Liberia Decent Work Act of 2015. The LMP seeks to achieve the following specific objectives:

- I. Promote safety, good health and employee welfare at work by:
 - Establishing a system to appropriately manage and protect the OHS and welfare

of workers including both employees and contractors and others who may be exposed to the risks associated with the project activities;

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

This LMP applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers. The LMP is applicable, as per ESS2 and the Liberia Decent Work Act of 2015, to the Project in the following manner:

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

1.3. OVERVIEW OF THE LIBERIA WOMEN EMPOWERMENT PROJECT (LWEP)

The Liberia women Empowerment Project is a five-year World Bank-funded project that aims to improve gender equality attitudes and livelihood opportunities for women in project areas while strengthening the institutional capacity of the Government of Liberia to advance gender equality. The project will fund activities that would: (a) enable positive social norms and pilot enhancement to basic social services; (b) build economic and social empowerment opportunities; and (c) strengthen public institutions to advance gender equality. The project is being implemented by the Ministry of Gender, Children, and Social Protection (MGCSP). MGCSP/PMU will take the overall responsibility of ensuring the effective implementation of the project, with support from the technical and steering committees (MoA, MoE, MIA, and MoH). In addressing other components of the project, the Community-based components (1, 2, and 3) of the Project will be implemented within the same communities in a total of 6 [six] counties, targeting an average of 750 communities in Liberia comprising Montserrado, Gbarpolu, Bomi, Grand Cape Mount, Grand Gedeh and River Cess.

The following listed below are the project components:

Component 1: Enabling positive social norms and community mobilization (\$8.0 million). This component supports two subcomponents: i) subcomponent 1.a: Addressing social norms that drive GBV/IPV and, ii) subcomponent 1.b: strengthening community mobilization and citizen engagement.

Component 2: Enhancing basic services in health and education (\$5.4 million). This component will support two subcomponents: i) Sub-component 2.a: increase help-seeking behavior for GBV services and ASRH at community level and, ii) Sub-component 2.b: promote community engagement to empower girls, schools and communities.

Component 3: Promoting resilient livelihoods through community-led approaches (\$19.0 million). This subcomponent plan to support two subcomponents: i) Sub-component 3.a: Capacity building of resilient livelihoods groups and, ii) Sub-component 3.b: Supporting grants for women-led livelihoods.

Component 4: Strengthening public institutions to advance gender equality. This component supports two subcomponents: I) sub-component 4.a. Build the gender infrastructure in MGCP and MoA and, ii) Sub-component 4.b: Policy dialogue and coordination.

Component 5: Project management, monitoring and evaluation (\$3.6 million). This component plans to support two subcomponents: i) sub-component 5.a: project management, monitoring and evaluation and, ii) sub-component 5.b: knowledge management.

1.4. SCOPE OF THE LABOUR MANAGEMENT PROCEDURE

This LMP describes the ESS2 and ESS4 requirements and expectations in terms of compliance, reporting, roles, supervision and training with respect to labour and working conditions, including camp accommodation in the World Bank ESF and the Liberia Decent Work Act. This LMP will cover all categories of workers. This LMP does not cover government workers/civil servants working in connection with this project except there is a legal transfer of their employment or engagement to the LWEP. This LMP will set out the following procedures:

- How workers will be managed in accordance with the national law requirement,
- Guidelines for the different categories of project workers,
- Terms and conditions of Employment,
- Child Labor,
- Forced Labor,
- Non-discrimination and equal opportunity,
- Protecting the Workforce,
- Grievance Mechanism,
- Occupational Health and Safety.

2. AN ANTICIPATED LABOUR USE FOR THE PROJECT

2.1. NUMBER OF PROJECT WORKERS

The precise number of contract workers who will be employed is not known as of now. This will become known as and when the implementation commences when the LSP is onboarded. The total number of direct workers are employees of the MGCSPP and therefore dedicated to this project. These are persons hired under the Project Management Unit (PMU) to ensure the successful implementation of the project. All other workers to be involved in the project except

from the LSP will not be classified as direct workers.

2.2. CHARACTERISTICS OF PROJECT WORKERS

Given the nature of the project workforce (mostly unskilled and semiskilled women farmers, and other laborers, etc.) and characteristics that will come from the labour force market in Liberia, additionally, it is likely the workforce, especially the lower-skilled/ skilled workers will comprise both female and male in the PMU. The expectation is that the majority of labour will be locally hired except for a few skilled workers. The project will encourage the training and hiring of as many local people from the neighboring community as possible where the activities may take place. Workers may be categorized into direct workers, contract workers, community workers, and primary supply workers in accordance with ESS 2. This section includes project worker definitions of all workers (both governmental and contractors, etc., who will work or provide services during the project implementations.

2.3. DIRECT PROJECT WORKERS (GOVERNMENT WORKERS)

The World Bank ESS2 categorizes Project workers into four categories:

1. Direct workers: People employed or engaged directly to work specifically in relation to the Project.
2. Contracted workers: People employed or engaged by third-party contractors to perform work related to the core function of the Project, regardless of location.
3. Primary supply workers: People employed or engaged by the primary suppliers.
4. Community workers: People employed or engaged in providing community labor.

The project is being implemented by the Ministry of Gender, Children, and Social Protection (MGCSPP) and other implementing ministries will include the Ministry of Agriculture, Education and Health. These will provide direct workers to be drawn also from implementing agencies such as the Small Business Administration (SBA). These are also public and civil servants who are involved in the implementation of other national development projects.

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

Project Management Unit (PMU)

The parent project currently comprises one National Project Coordinator, a Financial Management Officer, and a National Procurement Specialist, who are responsible for all financial management and procurement-related activities under the project, a monitoring and evaluation Specialist who is responsible to ensure the fair implementation of the project activities, and safeguards specialists (environmental specialist and social safeguards Specialist (to be hired

shortly)) to support, monitor and report on the implementation of the Environmental and Social Commitment Plan (ESCP). A Gender Specialist who is responsible to handle all the gender-related issues that may arise from the project implementation, a Communications/ GRM Officer responsible for the branding and handling of complaints and grievances of the project; and an Administrative Officer. Additionally, the project is due to hire two staff, a procure assistant, and a finance assistant to assist with the procurement and financial activities of the project. Key specialists and other relevant officers deemed necessary for the implementation of various interventions will form part of the PMU as well. These are direct workers responsible for the overall implementation of the project.

Short Term Technical Staff

In addition to the positions required for the full duration of the Project, the project has an M&E Technical Consultant and is due to recruit a capacity building technical Consultant to assist in the building of capacity of the parent agency (MGCSP staff) under component 4 of the project for a limited duration.

All these staff, including the other staff assigned to the serve on the PMU, are considered as direct staff of the project under ESS2 and the respective standards/provisions will apply. However, the civil servants assigned to serve on the PMU, whether full-time or part-time, will be bound by their existing public sector employment agreement or arrangement, and provisions under this LMP will not apply to such parties. However, their health and safety needs as required under ESS2 will be considered, and the measures adopted by the project for addressing occupational health and safety issues, including the signing of an ethical Individual code of conduct for environmental, social, GBV, and health and safety compliance.

2.4. CONTRACTED WORKERS

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

2.5. LOCAL WORKERS

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

project.

2.6. WOMEN WORKERS AND MARGINALIZED WORKERS

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

2.7. PRIMARY SUPPLY WORKERS

Primary supply workers are individuals and groups who will be employed by formal businesses who are required to supply procured materials and/or produce materials to the project based on agreed procurement standards. As part of the environmental and social assessment, any new supplier will be vetted regarding compliance with taxes, certification, licensing, and Public Liability Certificates. In recruitment policy, consideration of primary suppliers will also be attached to meeting the relevant requirements of this LMP including identifying potential risks of child labour to ensure that all workers are at least 15 years old which is the minimum age for employment, and that workers aged between 15 and 18 years are not engaged in hazardous work. Issues of forced labour and safety which may arise in relation to primary suppliers will also be monitored and avoided in both the construction and operation phases of the project.

The Government of Liberia through the MGCSP will require the primary supplier to always identify the risk of child labour and forced labour. The labour management procedures sets out roles and responsibilities for monitoring primary suppliers. If child labour or forced labour cases are identified, the MGCSP will require the primary supplier to take appropriate steps to remedy them. Furthermore, where there is a significant risk of serious safety issues related to primary supply workers, the MGCSP will require the relevant primary supplier to introduce procedures and mitigation measures to address such safety issues. Such procedures and mitigation measures will be reviewed periodically to ascertain their effectiveness.

2.8. COMMUNITY WORKERS

The project is being implemented in rural Montserrado, Bomi, Gbarpolu, Rivercess, Grand Gedeh, and Grand Cape Mouny counties, and therefore community involvement in activities work and other such activities is not foreseen. Community members are therefore not expected to be employed as community labour.

2.9. TIMING OF LABOR REQUIREMENTS

The direct workers (PMU staff) will be engaged full-time and retained for the project's duration. Some other workers such as experts/consultants will be hired on a demand basis throughout the project lifecycle. The timing for the recruitment of community workers is not known at this stage. Once the project Lead Service Provider (LSP) has been hired, the LMP will be updated accordingly to include additional information on the timing and sequencing of engaging labor and different types of workers.

TABLE 1: POTENTIAL LABOUR RISKS

From the anticipated project activities, potential labor risks have been identified which must be monitored closely by the PMU and Lead Service Provider during project implementation to avoid any adverse impact on the project. These are summarized in Table 3 below.

Table 1: Potential Labor Risks and Mitigation Measures

S/No.	Potential Labor Risk	Mitigation Measures
1.	<p>Occupational risks and hazards (incidents and accidents)-</p> <p>Lack of understanding and implementation of Occupational Health and Safety (OHS) requirements for the contracted workers.</p> <p>The conduction of hazardous work, such as working at heights, working on roads or in confined spaces (small civil works), use of hazardous materials (fertilizers and pesticides in agricultural activities)</p>	<p>Ensure full compliance with the OHS Management plan.</p> <p>Provide regular OHS training to staff.</p> <p>Ensure appropriate use of PPE.</p> <p>Put appropriate safety warning signs on the workplace.</p> <p>Put a list of work that is considered hazardous for children under 18 on the workplace.</p> <p>Develop Standard Operating Procedures (SOPs) for all major tasks.</p> <p>As part of the C-ESMPs and before commencement of works, contractors shall prepare an OHS plan that shall be maintained/ enforced throughout Project implementation.</p>
2.	Risk of Contracting diseases	<p>Continously raise awareness on communicable diseases for project workers on site and isolate infected individuals to seek medical attention or the quarantine of those heavily exposed, such as contractor workers or close contacts; adjustments to work schedules or cancellation of public events; limiting travel; and restricting access to public venues.</p> <p>For covid -19 cases if any, use a shift system to decongest workers from highly congested areas/ rooms if required.</p>

		<p>Enforce national COVID-19 protocols are adhered to if need be.</p> <p>Provide appropriate nose masks and PPEs.</p> <p>Encourage vaccination of all staff</p>
3.	<p>Gender-Based Violence (GBV) and Potential Sexual Exploitation and Abuse/Harassment (SEA/SH) risks and Gender-Based Violence (GBV) among the Project workers.</p>	<p>Hire local labor.</p> <p>Sensitize the workforce and community on the GBV action plan and implement it.</p> <p>Establish and run a grievance redress mechanism with special safe procedures for sensitive cases GBV/SEA/SH and child protection cases, including child labor cases.</p> <p>Sensitize all workers, including LSP, and ensure all workers sign an Individual Code of Conduct (COC) on environmental, social sustainability, GBV, health and safety risks.</p>
4.	<p>Child labor</p>	<p>To mitigate risk of child labor in the communities surrounding worksites:</p> <ul style="list-style-type: none"> • Sensitize workers and surrounding communities on child protection issues, including of child marriage or child labor. • Restrict workers from buying merchandise from children. <p>To mitigate risk of child labor amongst project workers</p> <ul style="list-style-type: none"> • Ensure age-verification of all workers and that the employer keeps a register of all employed children, which shall clearly show their names, and their ages and their dates of birth, duly certified wherever possible (Article 21.5 of the Decent Work Act, 2015) • Ensure that, before a child above 15, but under 18 years is engaged, a risk assessment is conducted prior to hiring a child. • Ensure that the workplace engaging children of minimum age for employment, visible provides information on special conditions of work applicable to children provides training and supervision and abides by all employment laws and regulations applicable to all workers, in addition to the special conditions for workers under 18.

		<ul style="list-style-type: none"> • Ensure regular monitoring of compliance with labor and child rights laws . <p>To mitigate all child protection risks for children, in community and workplace:</p> <ul style="list-style-type: none"> • Put in place and make known a reporting mechanisms for child protection issues, including child marriage or labor.
5.	<p>Noncompliance with labor laws: Risks on Project workers related to labor and working conditions that are not compliant with either the Liberian Labor Law or ESS2. For example, wages do not proportionate with tasks performed or industry standards, discrimination towards women and workers with disabilities or other vulnerabilities, unlawful termination, withholding of benefit, extended hours of work etc.,</p>	<p>Intensive monitoring to ensure compliance with labor laws and ESS2.</p> <p>Include clauses in contracts to ensure contractors comply with labor laws and ESS2.</p>
6.	<p>Poor conditions of service</p>	<p>Specify conditions of service to all workers in their contracts</p> <p>Ensure contractors implement conditions of services of workers.</p> <p>Ensure non-discrimination of workers</p>
7.	<p>Discrimination and exclusion of women and other vulnerable groups</p>	<p>Develop and maintain an efficient and effective Grievance Redress Mechanism (GRM)</p> <p>Implement a deliberate policy for gender equality.</p> <p>Develop deliberate mechanisms to monitor the participation of vulnerable groups in all activities</p>

8.	Labor influx	<p>Reduce labor influx by prioritizing hiring local labor.</p> <p>Provide systems to ensure equal opportunity for all regardless of gender, ethnicity, and social status.</p>
9	Inadequate Grievance and Redress Mechanism (GRM) to handle complaints of Workers	<p>Ensure a GRM that has special procedures for sensitive cases (e.g., GBV, SEA/SH and cases concerning children, e.g., child labor and child protection cases)</p> <p>Sensitize all workers on the GRM</p> <p>Encourage workers to report complaints and grievances related to the LWEP implementation to the GRM.</p>

Table 1 1

3.0 BRIEF OVERVIEW OF POLICY AND LEGISLATION REGULATING LABOR IN LIBERIA:

3.1 TERMS AND CONDITIONS

There are two main legislations which regulate the terms and conditions of employment in Liberia namely; The Decent Work Act 2015 and the Civil Service Agency Standing Order and two additional legislations/regulations detailing the conditions for safely engaging children of the minimum age for light work and minimum age for employment, namely Children's Law (2015) and the Hazardous and Light Work List for Children in Liberia of the Ministry of Labour (2023).

The Decent Work Act provides for the basic conditions of employment with a view to improving the status of employees in Liberia. The Act makes it mandatory for employers to furnish employees with written particulars of employment stating, hours of work, wages, leave entitlements, job description, grievance procedure, benefits if any, etc. It further mandates the Ministry of Labor and the Minimum Wage Board to issue Wages Regulations on a regular basis which deals with workers' terms and conditions of each industry. It is in this legislation where you will find provisions regulating:

- Contracts of employment (direct, indirect, part-time)
- Minimum wage
- Work of children and defining Child Labor as well as the minimum age for light work, apprenticeship and employment.
- Forced labor
- Treatment of migrant workers
- Leave entitlements, i.e. annual leave, sick leave, maternity and paternity leave and compassionate leave
- The protection of wages (prohibition against unlawful deductions)
- Retrenchment procedures
- Fair and unfair reasons for termination of employment
- Equal opportunities and fair treatment of all workers
- Disciplinary procedures
- Freedom of association and collective negotiation of terms and conditions of employment in the workplace (i.e. negotiations between employers and trade unions and the dispute resolution mechanism).

Per the Civil Service Standing Order which specifically deals with the rights, privileges, and responsibilities of civil servants in Liberia and the grievance redress mechanism. There are three specialized forums for dealing specifically with labor issues in Liberia, the Ministry of Labor's

hearing system, the Labor Court of Appeal and Enforcement¹ and the Civil Service Agency Grievance Redress Procedure as stipulated in the CSA Standing Order.

The MGCSP will require contractors to comply with the most current Wages Regulations Order for Building and Construction as issued by the Minimum Wage Board of the Ministry of from time to time.

3.2. A BRIEF OVERVIEW OF LABOUR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

Part VI of the Decent Work Act 2015 provides legislation on Occupational Health and Safety. The Part established a legal framework that:

- Secure the safety, health, and welfare of employees and other persons at work;
- Eliminate at their source, so far as is reasonably practicable, risks to the safety, health, and welfare of employees and other persons at work;
- Ensure that the safety and health of members of the public are not exposed to risks arising from work or workplaces;
- Provide for the involvement of workers, employers, and organizations representing those persons, in the formulation and implementation of safety, health, and welfare standards; and
- Develop and promote a national preventative safety and health culture, meaning a culture:
 - i. In which the right to a safe and healthy working environment is respected at all levels;
 - ii. Where government, employers, and workers actively participate in securing a safe and healthy working environment through a system of defined rights, responsibilities, and duties; and
 - iii. Where the principle of prevention is accorded the highest priority.

The legislation provides for the safety and health of persons at work and at the workplace and for the protection of persons other than persons at the workplace against hazards to safety and health arising out of or in connection with the activities of persons in the workplace and to provide for other matters incidental thereto. This act entrusts the employer with the obligation to ensure the safety and health of all its employees, and also to mitigate risks of exposure to any hazards in the workplace.

The legislation makes it mandatory for employers to provide personal protective clothing or equipment to employees exposed to wet, dusty, noisy, or any conditions that might expose the employees to harsh or dangerous conditions. Employees are to be trained to perform their work

¹ Chapter 9 through 11 of the Decent Work Act 2015

to avoid exposure to danger or injury and to be informed of any known hazards or diseases associated with the work they do, but also adequately cared for and compensated should such a situation occur.

4.0 RESPONSIBLE STAFF

The overview of responsible staff and oversight mechanisms will be described in further detail in the project ESMF which is currently being drafted. This is an overview – the details will flow from the ESMF and can be copied over at a later stage.

MGCSP Project Management Unit, particularly the Environmental and Social Specialists, have the overall responsibility to oversee all aspects of the implementation of the LMP, in particular to ensure contractor compliance. MGCSP will endeavor to address all LMP aspects as part of procurement for works as well as during contractor orientation. Implementation of the Labor Management Plan will be supervised by Project Steering Committee (PSC) LWEP Environmental and Social Specialists every month or at shorter intervals as defined by specific Plans.

Contractors will be responsible for the implementation of the plan daily and providing the required human, financial, and training resources for effective compliance. However, implementation of the LWEP will be done in collaboration with several other stakeholders who will also be expected to assist in the management of workers within their areas of responsibility in the project.

Occupational Health and Safety Measures. Contractors must engage a minimum of one safety officer. Smaller contracts may permit one of the safety officers to carry out other assignments as well. The safety officer will ensure the day-to-day OHS compliance with specified safety measures and records of any incidents/accidents. Incidents /accidents will be reported to MGCSP/LWEP every month while minor incidents/accidents will be reflected in the monthly/quarterly reports to the World Bank and major issues will be flagged to the World Bank immediately.

Labor and Working Conditions. Contractors will keep records by specifications set out in this LMP. MGCSP may at any time require records to ensure that labor conditions are met. The PMU will review records against actuals every month and will require immediate remedial actions if necessary. A summary of issues and remedial actions will be included in quarterly reports to the World Bank.

Worker Grievances: The worker's grievance mechanism should serve three key functions. First, it should serve as a focal point of communication across the organization where workers can report and receive advice on their concerns and grievances and from which concerns and grievances are channeled to management. Second, the mechanism should be mandated to identify remedies to be implemented through internal procedures in the form of corrective action, mediation,

settlement, or dispute resolution. Third, the mechanism should have the capacity to direct complainants or hand over cases to appropriate external mechanisms, including non-state and state-based mechanisms, such as courts, GBV Service Providers and the Family Support Unit of the Liberian Police Force, socio-psychological support units in the case of GBV/SEA/SH complains, but where worker concerns are not resolved, the national GRM system will be used but the PMU will keep track of the resolutions which will be reflected in quarterly reports to the World Bank.

Training. Contractors are required to at all times, have a qualified safety officer on board. If training is required, this will be the contractor's responsibility. The safety officer will provide instructions to contractor staff. MGCSP/PMU will conduct training to address risks associated with labor influx and will provide a schedule for training if required. The contractor will be obligated to make staff available for such training, as well as any additional mandatory training required by PMU as specified by the contract.

5.0 AGE OF EMPLOYMENT AND CHILD LABOR

The project will comply with the ESS2 and the Liberia Labor Law with regards to minimum age for engaging and employing a person, and to prevent child labor.

In Liberian context this means that the minimum age for light (non-hazardous) work in connection to a World Bank project is 14 years (even if national legislation says 13 years), and for full-time employment carrying out non-hazardous work, minimum age for employment is 15 provided that the child has finished compulsory education. Minimum age for hazardous work is 18 years. In addition to these age-limits, the Hazardous and Light Work List adopted by the Ministry of Labour in 2023 should be used as a guideline for what is permitted and what is prohibited work for anyone under 18.

Legal framework with regards to safeguards to prevent child labor

In addition to defining minimum ages of light work and employment, the law in Liberia defines specific obligations to put in place safeguarding against child labor.

Under the Children's Law (2011), a child who has turned 15 and who has finished compulsory education can be employed under condition that

- the employer has provided training and supervision, instructing "the child in a trade to the best of the ability, skill and knowledge of the employer;
- provides reasonable pay or allowances for the services of the child;
- take responsibility for any harm caused to the child as a result of the child's employment or apprenticeship;
- provide a safe and healthy environment for the child;
- abide by all other employment laws and regulations applicable to other

In addition, under the Decent Work Act (2015) a child who has turned 15 and who has finished compulsory education can be employed under condition that

- The employer keeps a register of all employed children, which shall clearly show their names, and their ages and their dates of birth, duly certified wherever possible (Article 21.5)
- That there is posted a notice at the workplace setting out the special conditions of work applicable to children set out in section and any other special conditions that are prescribed (e.g. the Hazardous and Light Work list of 2023)
- A child who has reached the age of 15, but has not yet attained the age of 16 years may not be employed for more than 7 hours in any day, or for more than 42 hours in any working week and may not work during school hours.
- For children above 15, daily hours of work for children shall include one or more rest periods totaling at least one hour, with rest periods so arranged that a child does not work for more than four consecutive hours
- Child workers who have reached the minimum age for employment are given annual leave + additional annual leave equivalent to the number of working days in one (1) week

In addition to these legal requirements, World Bank ESS2 requires that before a child above the minimum age for work but below 18 is engaged in connection with the project, an appropriate risk assessment needs to be conducted prior to the work commencing.

In accordance with ESS2, children below 15, but not younger than 14 can, in line with Decent Work Act, Sections 21.3 be engaged in light work of the project provided that:

- They only work for a maximum of two hours per day and fourteen hours per week;
- The work is not likely to be harmful to a child's health or safety, moral or material welfare or development and is in compliance with the Hazardous and Light Work List adopted by the Ministry of Labour in 2023;
- Not employ children during school hours or reducing their capacity to benefit from instruction.

In line with ESS2, paragraph 18, and the Decent Work Act children below 18 are prohibited from being engaged in hazardous work. Hazardous is defined in the Hazardous and Light Work List adopted by the Ministry of Labour in 2023 and includes:

- work which exposes children to physical harm, psychological or sexual abuse;
- work underground, under water, at dangerous heights, or in confined spaces;
- work with dangerous machinery, equipment, and tools, or which involves the manual handling or transport of heavy loads;
- work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health;

- work under particularly difficult conditions such as work for long hours or during the night, or work where the child is unreasonably confined to the premises of the employer.

No child under the age of 18 will be employed to engage in construction work because it is generally classified as a hazardous activity. The contractor will be responsible to ensure those employed to engage in construction activities are 18 years or above. It is the contractor's responsibility to a system to verify the age of workers and procedures to implement this requirement including the project health and safety management plan.

Incidences involving children, and suspected cases where a child's work may fall within the legal definition of child labor by a contractor or in connection with the project will be investigated immediately. If a case of child labor is suspected within the workforce of the project, the child and his/her parents should be informed of a right to remediation which will depend on the age and situation of the child. If the child is above the minimum age for employment or light work, and there is a possibility to reassign the child to other tasks, or to ensure work conditions are compliant with legal standards for children's work, this shall be the priority. If the child is younger than these minimum ages, or a re-assignment to other tasks is not possible, the right to remediation may be more significant, and include support to go back to school, or other remediation that is found appropriate based on the situation of the case. A contractor who engages a child in child labor may receive penalties, in line with the Decent Work Act (2015).

6.0 POLICIES AND PROCEDURES

Equal opportunity to all: Employment of project workers will be based on the principles of non-discrimination and equal opportunity. There will be no discrimination concerning any aspects of the employment relationship, including recruitment, compensation, working conditions and terms of employment, access to training, promotion, or termination of employment. The following measures will be followed by contractors and monitored by the LWEP Social specialist, to ensure fair treatment of all employees:

- Recruitment procedures will be transparent, public and non-discriminatory, and open concerning ethnicity, religion, sexuality, disability, or gender.
- Clear job descriptions will be provided in advance of recruitment and will explain the skills required for each post.
- All workers will have written contracts describing the terms and conditions of work and will have the contents explained to them. Workers will sign the employment contract.
- Employees will be informed at least two months before their expected release date of the coming termination.

- Depending on the origin of the employer and employee, employment terms and conditions will be communicated in a language that is understandable to both parties.
- In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulty understanding the documentation.

Tender and contract documents: Most environmental and social impacts of subcomponents resulting from activities directly under the control of contractors will be mitigated directly by the same contractors. As a consequence, ensuring that contractors effectively mitigate project adverse environmental and social impact arising from the project activities. MGCSP will incorporate standardized environmental and social clauses in the tender documentation and contract documents, in order for potential bidders to be aware of environmental and social performance requirements that shall be compliance, and reflected in their bids, and required to implement the clauses for the duration of the contract. MGCSP will ensure compliance by contractors with these clauses.

Environmental and social management documentation: As a core contractual requirement, the contractor is required to ensure all documentation related to environmental and social management, including the LMP, is available for inspection at any time by the MGCSP or representative. The contractual arrangements with each project worker must be clearly defined in accordance with the law of Liberia while a full set of contractual requirements related to environmental and social risk and impact management will be provided in the projects' Environmental and Social Impact Assessment. All environmental and social requirements will be included in the bidding documents and contracts in addition to any additional clauses, which are contained, in the project's environmental and social instruments.

Forced and child labor: Under no circumstances will the LWEP, the Ministry, contractors, suppliers, or sub-contractors will force anybody to work or engage children for work that falls within the legal definition of child labor. Forced labor includes bonded labor (working against an impossible debt), excessive limitations of freedom of movement, excessive notice periods, retaining the worker's identity or other government-issued documents or personal belonging, imposition of recruitment or employment fees payable at the commencement of employment, loss or delay of wages that impede the workers' right to end employment within their legal rights, substantial or inappropriate fines, physical punishment, use of security or other personnel to force or extract work from project workers, or other restrictions that compel a project worker to work in a non-voluntary basis. No trafficked persons shall be employed in connection with the project. Child labor's defined by the age of the working person and the conditions for work.

6.1 OCCUPATIONAL HEALTH AND SAFETY (OHS)

MGCSF is committed to:

- i. Complying with legislation and other applicable requirements which relate to the project's occupational health and safety hazards.
- ii. Enabling active participation in OHS risks elimination through promotion of appropriate skills, knowledge and attitudes towards hazards.
- iii. Continually improving the OHS management system and performance.
- iv. Communicating this policy statement to all persons working under the control of MoE with emphasis on individual OHS responsibilities.
- v. Availing this policy statement to all interested parties at all project facilities and sites.

Under current MGCSF rules, any contractor is required to have at least one Health, Safety, and Environmental officer for the workplace or a section of the workplace for an agreed period in accordance with Part VI on Occupational Health and Safety of the Decent Work Act of 2015. At a minimum, the officer must:

- a) Identify potential hazards; Ensure that special conditions, including lists of work that is considered hazardous for child workers, and therefore forbidden for anyone below 18, are visibly displayed at the workplace.
- b) In collaboration with the employer, investigate the cause of accidents at the workplace;
- c) Inspect the workplace including plant, machinery, and substance, with a view to ascertaining the safety and health of employees provided that the employer is informed about the purpose of the inspection;
- d) Accompany an inspector whilst that inspector is carrying out the inspector's duties in the workplace;
- e) Attend meetings of the safety and health committee to which that safety and health representative is a member;
- f) Subject to (g), make recommendations to the employer in respect of safety and health matters affecting employees, through a safety and health committee; and
- g) Where there is no safety and health committee, the safety and health officers shall make recommendations directly to the employer in respect of any safety and health matters affecting the employees.

In accordance with the above provisions, and to further avoid work related accidents and injuries, the contractor will:

- Provide occupational health and safety training to all employees involved in work. Provide protective masks, helmets, overall and safety shoes, and safety goggles, as appropriate.
- Provide training on the legal definition of child labor, and how to prevent it.

- Provide workers in high-noise areas with earplugs or earmuffs.
- Ensure the availability of a first aid box.
- Provide employees with access to toilets and potable drinking water.
- Provide safety and occupational safety measures to workers with Personal Protection Equipment (PPE) when installing pumps to prevent accidents during installation and follow safety measures in installing submersible pumps and cleaning pipes.
- Properly dispose of solid waste at designated permitted sites landfills allocated by the local authorities and the receipts of waste from the relevant landfill authorities.
- Ensure that the head of the well is covered tightly.

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

7.0 GRIEVANCE REDRESS MECHANISM

7.1 WORLD BANK GRIEVANCE REDRESS SYSTEM

The Communities and individuals who think they may be adversely affected by a World Bank (WB)-funded project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address project-related concerns. Project-affected communities and individuals may submit their complaints to the WB's independent Inspection Panel which determines whether harm occurred or could occur, because of WB's noncompliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the WB's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the WB's corporate GRS, please visit <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

7.2 THE GRIEVANCE MECHANISM FOR ALL PROJECT WORKERS

A grievance mechanism will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns.

The PMU is on the verge of setting up a Grievance Redress Mechanism (GRM) for ongoing Bank financed LWEF. The PMU at MGCSP is in the process of establishing Grievance Redress Committees (GRCs) at the national, county, and local community levels for the project. It is expected that the GRCs established under the Bank-financed projects at LWEF will be updated, where applicable, to conform to resolving grievances on LWEF. The project-established GRM will cater to the needs of workers employed under this project and any person who may have

project-related complaints/grievances. The Contractor(s) will be required to inform their workers, and sub-contractor(s), and display publicly on the work site the information about the existing project GRM which will include:

- a brief description of the GRM mechanism and what it is used for;
- the process to send grievances such as comments/complaints forms via suggestion boxes, email, a telephone hotline (**4433/0555899983/0775063029**), or in writing (**a designated email address to be provided**) and managed by the GRM Officer with an indication of additional fax.
- the responsible unit and or person for reviewing the submitted grievances;
- stipulated timeframes to respond to grievances; and
- Mechanisms for escalation of grievances at the next level of the GRM

Information on the project GRM will be made available to workers at all facilities, and government offices (national county, and community levels) to ensure that all workers have adequate information on how to lodge a complaint and who to direct it to. Anonymity will be assured when handling workers' grievances. A structure needs to be put in place for reviewing, responding, and providing feedback on the issues raised.

The following actions will be used for managing complaints for this project:

- Complaints should be sent to the GRM focal point at the workplace by email, text, phone, letter, or in person. The complaints should be collated onto a complaint form and logged into the register and reported using the format provided in the project SEP. The email address and phone number provided above will be available to the workers at the signing of the contract/recruitment.
- Complaints should be reviewed by the PMU/LSP weekly upon receipt. The team will review the complaints provide guidance on the course of action and ensure follow-up on previous complaints. Any preliminary investigation should take place within 5 working days of the committee meeting. Feedback will be given to the complainant within 10 working days.
- For informal complaints, i.e., those raised through social media, print media, or not formally lodged, the committee should deliberate upon them to decide whether to investigate based on the substance and potential impact/reputational risk.
- If the complaint is referred to the main project GRM and the government's legal complaints structures the World Bank should be notified.
- No disciplinary or legal action will be taken against anyone raising a complaint in good faith.
- A monthly report of complaints resolution should be provided to the PMU/LSP and the World Bank (as per the reporting requirement).

7.3 POTENTIAL COMPLAINTS AND GRIEVANCES STAGES

There will be a Worker's grievance procedure with five major stages. These stages will include (i) the complaint or grievance uptake (ii) Assessment, analysis, and response (iii) Resolution and closure (iv) Registry and monitoring (v) GRM Evaluation.

Stage 1: Complaint Uptake

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

Stage 2: Assessment, Analysis, and Response

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

Stage 3: Resolution and Closure

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

Stage 4: GRM Registry

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

Stage 5: GRM Evaluation

The Workers GRM evaluation shall be undertaken alongside other evaluation exercises for the project and the output of the evaluation shall be shared with the Project implementers MGCSF and the Bank.

Contractors and/or project grantees shall appoint representatives to be the contact point for all grievances. In the case of project management staff, the point of contact will be the Permanent Secretary.

Depending on the workforce, contractors and grantees may form a Workplace Grievance Redress Committee (WGRC) comprising representatives from different departments and the ESS officers. The representatives will first receive grievances and notify the WGRC. Grievances will be recorded in a registry of complaints and all information related to the handling of the grievances will be recorded in the registry. In the case of issues with project management staff, the Project Manager may be required to exclude her or himself if the complaint directly involves him or her. Complaints related to GBV reported to the worker's grievance redress system shall be handled by the Project Gender Specialist to provide confidential support to the complainants. The Contractor shall notify the Project within 24 hours of learning of the incident.

The WGRC will attempt to address the grievance within the established time frame of 3 weeks upon receipt. In cases of timely or urgent matters, a period of a minimum of 24 hours and a maximum of 15 days will be allotted for addressing and resolving the grievance. Grievances can be made in person, by telephone call (**Hotline 4433/0555899983/0775063029**), or in writing (**a designated email address to be provided**). Grievances can be made anonymously. For grievances made via telephone or in person, a written account will be compiled, and the complainant will be asked to verify its authenticity and sign that it is an accurate account.

In instances where the WGRC successfully resolves grievances, the complainant will be informed of the measures taken to address the grievance.

If the grievance cannot be resolved by the WGRC, the issue will be escalated to the management of contractors or grantees for further action.

The management will attempt to resolve the matter and provide feedback to the complainant.

If issues cannot be resolved at the management level, then they may be referred to the labour court at the Ministry of Labor for necessary action and pronouncement.

The Ministry of Labor's ruling would be the final tier of the grievance mechanism. If unresolved, either party may seek redress in the courts of the Country. Parties involved will be advised that they can directly contact the Project Office Ministry on issues concerning grievances.

Information about the GRM will be disseminated to workers through signs at the project site, brochures and handbills at the project website, and SMS messages sent to the worker's phones.

7.4 GRIEVANCE FOR SENSITIVE CASES, INCLUDING GENDER-BASED VIOLENCE (GBV), CHILD PROTECTION AND CHILD LABOR CASES

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

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

The GRM officer should assist survivors by referring them to GBV Services Provider(s) or the nearest one-stop GBV center for support immediately after receiving a complaint directly from a survivor. This will be possible because a list of service providers and GBV risk management centers will be made available before project work commences as part of the mapping exercise. The information in the GRM must be confidential, especially when related to the identity of the complainant. For GBV, the GRM should primarily serve to (i) refer complainants to the GBV Services Provider; and (ii) record the resolution of the complaint. The GRM shall apply to all types of workers who experience GBV cases with dedicated email address and toll-free number for lodging of GBV complaints/cases. Due to their young age, grievance cases that involve children under 18 are to be given special considerations. Child cases requiring special attention, and referral to the specialized GRM may involved

- SEA/SH and other types of violence or abuse.
- Child labor:
 - If a child below 14 is working in connection to project activities.
 - If a child between 14 and 15/16 (whichever is the age when the child has finished compulsory education) is found working in connection to project activities more than two hours per day and/or more than 14 hours per week, if the work is jeopardizing the child's attendance at school or is in any other way harmful to a child's health, safety, moral or material welfare or development as defined by law and if work conditions are not qualified as light work.
 - If a child above 15/16 (whichever is the age when the child has finished compulsory education), but below 18 is found to be working more than seven hours a day or more than 42 hours in a week, if the child is not given sufficient rest periods or performs hazardous work that is in any way harmful to a child's health, safety, moral or material welfare or development.
 - If a child below 18 is suspected of being forced to work, or to be a victim of child trafficking. Suspicion of forced child labour and/or child trafficking is justified: (i) if work of a child is performed under the coercion of a third party; if the child is working as a direct result of the forced labour of his or her parents, if a child is from another country or region and is not with his or her primary caregivers and the employer appears to be taking advantage of the child's possible vulnerability, if a child's family has been exploited, and/or when an imbalance of power between the child and the employer has been abused.

Child cases should be dealt with by the specialized GRM and the project management swiftly. Cases of suspected forced child labor and child trafficking should be immediately reported to the specialized GRM, and by the GRM to the project management and onward to the World Bank within 24 hours. All other cases should be reported within 48 hours.

The project is responsible to ensure that the child's case is appropriately remediated, and does not leave the child more vulnerable after the case has been reported. This could mean supporting with resources, in line with ESMP, for a remediation package, as and if needed.

7.6 WORLD BANK GRIEVANCE REDRESS SYSTEM

Communities and individuals who believe that they are adversely affected by a WB-supported project may submit complaints to existing project-level GRM or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address

project-related concerns. Project-affected communities and individuals may submit their complaints to the WB's independent Inspection Panel which determines whether harm occurred or could occur, because of WB noncompliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the WB's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the WB's corporate GRS, please visit <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

8.0 MONITORING AND REPORTING

8.1 LABOUR MANAGEMENT PROCEDURE MONITORING & REPORTING

This list of monitoring indicators, frequency of monitoring, and responsible party/parties for monitoring will be used to guide the monitoring of the LMP. The indicators are not exhaustive and can be updated during the preparation of sub-project risk management instruments and during project implementation.

All the Sub-Project Contractors and Consultants will submit Monthly Progress Reports to the PMU through the LSP with a section dedicated to the progress on implementation of proposals in this Labour Management Procedure and a plan prepared based on this procedure. The section will report on number and type of workers, workers camp and amenities (as relevant), trainings (CoC orientation, signing, OHS, workers GRM), non-compliance issues and timelines for compliance, incidence/accident reports, and the status of grievances received among others. This document will also report on issues relating to ESS2 as well as the progress and performance of implementing this LMP. The report will also discuss mitigation measures of identified emerging labour impacts/risks and submitted to MGCSP/ PMU.

The Environmental and Social Specialists team at the PMU will compile a summary to include it in the Project's environmental and social section and submit it to the Bank in the Quarterly Report.

If need be, an annual third-party monitoring report and a project completion report capturing implementation of the LMP during the entire project cycle. Please see the table below.

TABLE 2: LMP MONITORING INDICATORS

ITEM	MONITORING INDICATOR	FREQUENCY OF MONITORING	MEANS OF VERIFICATION	RESPONSIBILITY FOR MONITORING	SUPPORTING AGENCIES
<p>Occupational Health and Safety Issues</p>	<ul style="list-style-type: none"> • Number, type, place and • Time of accidents/incidents • Number of workers receiving OHS and hygiene training provided for sub-project contractors and sub-contractors employees. • Number and type of PPEs distributed by Sub-Project Contractors and Sub-Contractors • Number of workers on site wearing the appropriate PPEs • Presence of Health and Safety Officer on Site or otherwise • Site worker's level of compliance with OHS standards e.g. wearing of PPEs • Presence of First Aid Kits on site or otherwise • Presence of Fire Extinguishers on Site • Hoarding material • Presence of handwashing facilities and hand sanitizers on site or otherwise 	<ul style="list-style-type: none"> • Monthly 	<ul style="list-style-type: none"> • Site Visits • Sub Project contractor's accident Records books • Accident/ Incident Reports 	<ul style="list-style-type: none"> • MGCSPP/PMU Safeguards Dept 	<ul style="list-style-type: none"> • Sub Project Consultant • Factory Inspectors

Labour related issues	<ul style="list-style-type: none"> • Number of Sub Project • Contractor and SubContractor employees with formal Contracts • Presence of under-aged workers (18 years and below) or otherwise • Number and type of employees recruited from the community by gender • Average monthly income of project workers and informal workers by gender • Working days and hours • Contractor and Sub-Contractor employees who have signed and understand the Code of Conduct. 	Monthly	Site Visits <ul style="list-style-type: none"> • Inspection of Employees' Contracts • Random interview of project workers 	MGCSP/PMU Safeguards dept	EPA Sub Project Consultant Factory Inspectors
Gender-Based Violence, Sexual Exploitation and Abuse, and Sexual Harassment, Child Protection and Child Labor	<ul style="list-style-type: none"> • Uptake points of complaints • Number of SEA/SH/GBV, Child Protection and Child labor cases reported by type • Number of SEA/SH/GBV, , Child Protection and Child labor cases under investigation by type • Number of cases under prosecution by type • Number of cases discharged by outcome • Sex and age of perpetrators and survivors • Duration between case reportage, feedback, and case completion 	Daily	<ul style="list-style-type: none"> • Grievance Redress Mechanism Platform • On-Site Grievance Redress Register 	MGCSP/PMU Safeguards dept	<ul style="list-style-type: none"> • EPA • Sub Project Consultant • GBV, Child Protection Service Providers • Police • Hospital • NGOs working in the field of Community

Community Health and Safety Issues	<ul style="list-style-type: none"> • Uptake of complaints • Number of GBV/SEA/SH, Child Protection and Child Labor cases reported by type and location (community) • Number of GBV/SEA/SH, Child Protection and Child Labor cases under investigation by type • Number of cases under prosecution by type • Number of cases discharged by outcome • Sex and age of perpetrators and survivors • Duration between case reporting, feedback and case completion • Incidence of communicable and non-communicable diseases in the project beneficiary communities • Accidents involving contractors trucks and equipment as well as third-party haulage trucks by type and degree of severity. 	Daily	<ul style="list-style-type: none"> • Grievance Redress Register • Grievance Redress Platform • Top ten causes of morbidity from hospital records of the nearest Health Facility • Grieve Redress Register • Reported accidents at local police stations 	MGCSP/PMU Safeguard dept	Sub Project Consultant Community Monitors
Fraud and Abuse of Office	<ul style="list-style-type: none"> • Number of fraud and abuse of office cases reported • Number of cases under investigation Number of cases under prosecution by type • Number of cases discharged by outcome 	Daily	<ul style="list-style-type: none"> • Grievance Redress Platform 	Police	MGCSP/PMU

TABLE 3: COMPARATIVE TABLE OF ESF AND THE NATIONAL REQUIREMENTS OF LIBERIA

ESF Objectives	National Requirements	Remarks on Similarities/Actions
ESS2	Decent Work Act 2015	
<ul style="list-style-type: none"> • To provide every employee with written particulars of employment 	<p>Section 13 of the Decent Work Act 2015 made basic provisions for full disclosure between employees and employers on employment contracts with different conditions depending on the type of contract. Concerning contracts of employment, it specifically states in 13.1.</p> <p>d) Every contract shall contain all such particulars as necessary to define the rights and obligations of the parties and shall in all cases include:</p> <ul style="list-style-type: none"> i) the name of the employer and the place of employment. ii) the name of the employee, the place of engagement and, where practicable, the place of origin of the employee and any other particulars necessary to identify the employee. iii) the nature of the employment and position to be held. iv) the duration of the employment. v) the appropriate period of notice to be given by the party wishing to terminate the contract, which shall not be less than the minimum period of notice provided for in the Act. <p>Section 13.1 further states in:</p> <p>j) Without limiting the scope of the preceding provisions, an employer may comply with this section by:</p> <ul style="list-style-type: none"> i. making a written contract of employment with an employee and providing the employee with a copy of the contract; or ii. making an oral contract with the employee and: <ul style="list-style-type: none"> (1) providing the employee with a written statement that contains the required information; or (2) if the terms of the oral contract are the same as those applying to other employees, posting a notice in the workplace which contains the required information in such languages as may be appropriate for the employees concerned. k) The employer shall keep a copy of the written contract, or the written statement referred to in paragraph j) throughout the employee’s employment, and for a period of five years after the termination of the employment. 	<p>National requirement conforms to ESS2 and shall be adhered to during the implementation of the project.</p>

<ul style="list-style-type: none"> • To promote safety and health at work 	<p>Chapters 24 through 28 of the Decent Work Act 2015 made adequate provisions to promote safety and health at work. The chapters particularly established a legal framework to:</p> <ul style="list-style-type: none"> a) secure the safety, health and welfare of employees and other persons at work. b) eliminate at their source, so far as is reasonably practicable, risks to the safety, health and welfare of employees and other persons at work. c) ensure that the safety and health of members of the public are not exposed to risks arising from work or workplaces. d) provide for the involvement of workers, employers, and organizations representing those persons, in the formulation and implementation of safety, health and welfare standards; and e) develop and promote a national preventative safety and health culture, meaning a culture: <ul style="list-style-type: none"> i) in which the right to a safe and healthy working environment is respected at all levels. ii) where government, employers and workers actively participate in securing a safe and healthy working environment through a system of defined rights, responsibilities, and duties; and iii) where the principle of prevention is accorded the highest priority. <p>Section 4.2 provides some specific definitions relative to Occupational Health and Safety concerns. Including amongst others</p> <ul style="list-style-type: none"> i) chemicals ii) disease iii) hazard iv) injury in relation to worker v) plant, machinery, equipment, and tool vi) premises vii) risk viii) Self-employed person iv) substance, and x) substance for use at work. 	<p>The national requirement fully satisfies ESS2 and will be adhered to during the implementation of the project.</p>
<ul style="list-style-type: none"> • To promote the fair treatment of, non-discrimination, and equal opportunity of project workers 	<p>Section 2.7 of the Decent Work Act prohibits discrimination in the workplace. It specifically states that.</p> <ul style="list-style-type: none"> a) No person shall discriminate against a person who works or who seeks to work in Liberia in an employment practice. b) No person shall discriminate against another in an employment practice because the person has exercised or attempted to exercise any of their rights in this Act. 	<p>Basically, the same in objective. The Project shall conform to the national requirements.</p>

c) Discriminate means to apply any distinction, exclusion or preference which has the effect, whether directly or indirectly, of nullifying or impairing equality of opportunity or treatment, including the provision of remuneration or other benefits:

i) on a ground identified in section 2.4; or

ii) because a person has exercised or sought to exercise or is entitled to the enjoyment of any right conferred by this Act.

d) It is not unlawful by virtue of this section:

i) to distinguish, exclude or prefer any individual:

(1) based on an inherent requirement of a particular job; or

(2) while implementing affirmative action measures consistent with the purposes of this Act.

ii) in the case of an employee who is pregnant, temporarily reassign her to different duties or functions that are suitable to her pregnant condition, provided that the reassignment does not lead to a reduction in remuneration or any other benefits in respect of her employment.

e) Affirmative action measures mean measures to redress the disadvantages in employment experienced by persons, groups, or categories of persons, in order to ensure their equitable representation in all occupational categories and levels in the workforce.

Section 2.4 of the Act also provides Equal protection for all workers. It states that:

a) All women and men are entitled, without distinction, exclusion, or preference to enjoy and to exercise the rights and protections provided in this Act.

b) Without limiting the scope of the preceding provision, all persons who work or who seek to work in Liberia are entitled to enjoy and to exercise the rights and protections conferred by this Act irrespective of:

i) race, tribe, indigenous group, language, color, descent, national, social, or ethnic extraction or origin, economic status, community, or occupation.

ii) immigrant or temporary resident status.

iii) sex, gender identity, or sexual orientation.

iv) marital status or family responsibilities.

- v) previous, current, or future pregnancy or breastfeeding.
- vi) age; vii) creed, religion, or religious belief; viii) political affiliation or opinion, or ideological conviction; ix) physical or mental disability.
- x) health status including HIV or AIDS status, whether actual or perceived; xi) irrelevant criminal record, the acquittal of a crime or dismissal of a criminal prosecution against them; or xii) personal association with someone possessing or perceived to possess one or more of these attributes.

use of all forms of forced labor.

Section 2.2 of the Decent Work Act 2015 prohibits any person in Liberia from being subjected to forced or compulsory labor except in the cases of work or service:

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

Section 2.3 strictly prohibits the worst forms of child labor including:

The ESS2 provides for a minimum age for work to be 14 years, unless national standards define a higher age. In the case of Liberian legislation, light work is allowed from 13 years. Since this point is not aligned with ESS2, light work should not be allowed on the project before a child has turned 14, which is the ESS2 Requirement.

With regards to employment, Liberian legislation defines a higher standard, which is 15/16 years (whichever is the age when a child has completed compulsory education). This shall be the minimum age for employment for the project.

On all other aspects, the Project shall conform to the national requirements.

i) all forms of slavery or practices like slavery, such as the sale and trafficking of children, debt bondage and serfdom, and forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict.

ii) the use, procuring or offering of a child for prostitution, to produce pornography or for pornographic performances.

iii) the use, procuring or offering of a child for illicit activities, for the production and trafficking of drugs as defined in the relevant international treaties; and

iv) work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or welfare of children.

Section 21.3, however, allows light work for children under the age of 15. It states that.

a) A child who is at least 13 years old may be employed to perform light work if they:

i) may only work for a maximum of two hours in a day and fourteen hours in a week, and ii) are employed in compliance with any prescribed procedures.

b) For the purposes of this Act, light work means work or any other activity that:

i) is not likely to be harmful to a child's health or safety, moral or material welfare or development; and ii) is not such as to prejudice the child's attendance at school or their capacity to benefit from instruction. Also, section 21.4 defines types of hazardous work that are prohibited for children as stated below.

a) The following types of work are prohibited for children:

i) work that exposes children to physical, psychological, or sexual abuse.

ii) work underground, under water, at dangerous heights or in confined spaces.

iii) work with dangerous machinery, equipment, and tools, or which involves the manual handling or transport of heavy loads.

iv) work in an unhealthy environment which may, for example, expose children to hazardous substances, agents, or processes, or to temperatures, noise levels, or vibrations damaging to their health; or

v) work under particularly difficult conditions such as working for long hours or during the night, or work where the child is unreasonably confined to the premises of the employer.

• **To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.**

Section 2.6, 20.11 and 2.12 of the Decent Work Act guarantee the rights of all workers to freedom of association, to form organizations and to bargain collectively. Section 2.6 particularly says:

a) All employers and workers in Liberia, without distinction whatsoever, may establish and join organizations of their own choosing, without prior authorization, and subject only to the rules of the organization concerned.

b) Subject to this Act:

i) an organization of employers or workers may draw up its own constitutions and rules, elect its representatives in full freedom, and formulate its own program of lawful activities; and

ii) employers and workers and their organizations **may**:

(1) bargain collectively; and

(2) engage in strike or lockout action in accordance with Chapter Forty-One of the Act.

Section 2.11 particularly states that:

a) No person may do, or threaten to do, any of the following:

i) require a worker:

(1) not to be or not to become a member of an organization of workers; or

(2) to give up membership of an organization of workers.

ii) prevent a worker from exercising any right conferred by this Act or from participating in any proceedings under this Act; or iii) prejudice or threaten to prejudice a worker because of past, present, or anticipated

(1) membership of an organization of workers.

(2) participation in the formation of an organization of workers.

(3) participation in the lawful activities of an organization of workers; (4) failure or refusal to do something that an employer may not lawfully permit or require a worker to do.

(5) disclosure of information that the worker is lawfully entitled or required to give to another person.

(6) exercise of any right conferred by this Act; or

In full alignment with ESS2 objective. The project shall apply the national requirements.

	<p>(7) participation in any proceedings under this Act.</p> <p>b) No person may advantage, or promise to advantage, a worker in exchange for that person not exercising any right conferred by this Act or for not participating in any proceedings under this Act.</p>	
<ul style="list-style-type: none"> • To provide project workers with accessible means to raise workplace concerns. 	<p>In addition to section 2.6 of the Decent Work Act 2015, Sections 2.13, 2.15, 2.16, and 36.3 state how to raise working condition-related issues, the procedure for negotiations, the composition of the parties involved in the negotiation, and the procedure to deal with issues that are not resolved through consensus. Paragraphs a) and b) of the section deals mainly with the handling of collective grievances as raised by the employees. Sections 2.15 and 9.2 through 9.8 also established remedies for contravention of fundamental rights. Section 2.15 particularly states:</p> <ul style="list-style-type: none"> a) A person who is the victim of a violation of a right protected by this Chapter may lodge a complaint under section 9.2. b) A registered trade union or registered employers' organization, acting on behalf of a member of that trade union or registered employers' organization, may lodge a complaint under section 9.2 alleging a violation of a right protected by this Act. 	<p>In alignment with ESS2. The project shall follow the national requirements.</p>
<ul style="list-style-type: none"> • To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate. 	<p>Section 2.4 of the Decent Work Act 2015 provides equal protection for all workers and potential workers. The section states thus:</p> <ul style="list-style-type: none"> a) All women and men are entitled, without distinction, exclusion, or preference to enjoy and to exercise the rights and protections provided in this Act. b) Without limiting the scope of the preceding provision, all persons who work or who seek to work in Liberia are entitled to enjoy and to exercise the rights and protections conferred by this Act irrespective of: <ul style="list-style-type: none"> i) race, tribe, indigenous group, language, color, descent, national, social, or ethnic extraction or origin, economic status, community, or occupation; ii) immigrant or temporary resident status; iii) sex, gender identity, or sexual orientation; iv) marital status or family responsibilities. v) previous, current, or future pregnancy or breastfeeding; vi) age. vii) creed, religion, or religious belief. 	<p>In full alignment with ESS2. The project shall meet the national requirements.</p>

viii) political affiliation or opinion, or ideological conviction; ix) physical or mental disability.

x) health status including HIV or AIDS status, whether actual or perceived; xi) irrelevant criminal record, the acquittal of a crime or dismissal of a criminal prosecution against them; or xii) personal association with someone possessing or perceived to possess one or more of these attributes.

Section 2.5 provides the right to equal remuneration as thus:

a) All women and men are entitled, without distinction, exclusion, or preference, to receive equal remuneration for work of equal or comparable value.

Equal remuneration refers to rates of remuneration established without discrimination based on sex.

Section 2.7 also prohibits discrimination.

a) No person shall discriminate against a person who works or who seeks to work in Liberia in an employment practice.

Also, section 2.8 prohibits sexual harassment in the workplace. It states:

a) A person shall not directly or indirectly sexually harass a worker:

i) in any employment practice; or ii) during a person's employment.

b) Sexual harassment means:

i) sexual conduct, which is unwelcome, unreasonable, or offensive to the recipient, and which occurs in circumstances where a person's rejection of, or submission to, such conduct is used explicitly or implicitly as a basis for a decision that affects that person's job; or

ii) Sexual conduct that creates an intimidating, hostile, or humiliating working environment for the person that is subject to that conduct.

c) Sexual conduct means:

i) conduct of a sexual nature, whether physical, verbal, or non-verbal; or ii) conduct based on sex affecting the dignity of women or men.

Chapter 9 of the Civil Service Standing Order defines sexual harassment in more detail and provides procedures for reporting, investigation, and redress.

Section 2.10 provides equal protection for persons living with HIV. It particularly states that

- a) Without limiting the generality of sections 2.4 or 2.9, workers and potential employees shall not be:
 - i) excluded from work or employment on the ground of their HIV status, whether known or unknown; or
 - ii) compelled or required, either before or during their work or employment, to:
 - (1) submit to HIV testing at the workplace; or
 - (2) Disclose their own HIV status, or the HIV status of any other person.

ESS4

- **To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project lifecycle from both routine and non-routine circumstances.**

In addition to the adequate provisions made in chapters 24 through 28 of the Decent Work Act 2015 to promote Occupational Health and Safety, the Liberia Environmental Protection Law 2002 has standards that protect the right of communities and persons to a clean and healthy environment. Section 5 protects the right to a clean and healthy environment, parts IV and V set environmental quality and pollution control licensing standards including standards on air, water, solid waste, noise, hazardous waste, ionization, and radiation among others. Section 56 particularly prohibits the discharge of hazardous substances and materials into the environment and the spillers' liability. Section 38 classified hazardous wastes and materials, and legal redress mechanisms are established in section 5. It states in part:

- 1) Any person can assert their right to a clean and healthy environment in fulfillment of section (34) of the agency Act by a) Petitioning the Agency to act; b) Bringing action before the Environmental Court established under section (32) of the Agency act.
- 2) An aggrieved person shall submit a petition for redress on a prescribed form and in a manner prescribed by the Agency detailing the issues to be resolved and attaching any supporting documents available to the person and the Agency shall respond within 21 days upon receipt of the petition.
- 3) If the agency does not respond within 21 days, and/or if the Agency action does not give redress, the aggrieved person may appeal to the Environmental Court in accordance with section (36) of the Agency Act;
- 4) Notwithstanding subsections (2) and (3), any person may commence a citizen suit in the Environmental Court on his/her own behalf to accomplish the conditions set forth in section (32) of the Agency Act.

National requirements in full conformity with ESS4. The Project will adhere to these requirements.



ANNEX 1: INDIVIDUAL ETHICAL CODE OF CONDUCT FOR ENVIRONMENT, SOCIAL, GBV, AND HEALTH AND SAFETY COMPLIANCE

1.0 SEA/SH and Violence against Children (VAC)

I _____, acknowledge that adhering to the Liberia Women Empowerment Project (LWEP) social and environmental standards, following the project's occupational health and safety (OHS) requirements, and preventing gender-based violence (GBV), sexual exploitation and abuse (SEA), sexual harassment (SH), Intimate partner violence (IPV) and violence against children (VAC) are important. All forms of GBV or VAC are unacceptable, be it on the work site, at the PMU, the work site surroundings, at worker's camps, or in the surrounding communities.

The ministry/project/employer considers that failure to follow ESHS² and OHS³ standards, or to partake in GBV, IPV, or VAC activities, constitute acts of gross misconduct and are therefore grounds for sanctions, penalties, or potential termination of employment. Prosecution of those who commit GBV or VAC may be pursued if appropriate.

2.0 I agree that while working on the LWEP project I will:

- a. Attend and actively partake in training courses related to ESHS, OHS, IPV, HIV/AIDS, SEA/SH, and VAC as requested by my employer.
- b. Shall wear Personal Protective Equipment (PPE), in the correct prescribed manner, at all times when at the work site or engaged in project-related activities.
- c. Take all practical steps to implement the contractor's environmental and social management plan (C-ESMP).
- d. Implement the OHS Management Plan.
- e. Adhere to a zero-alcohol policy during work activities, and refrain from the use of illegal substances at all times.
- f. Consent to a police background check.
- g. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.

² Environment, Social and Health and Safety

³ Occupational Health and Safety

- h. Not use language or behavior towards women, children, or men that is inappropriate, harassing, abusive, sexually provocative, demeaning, or culturally inappropriate.
- i. Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
- j. Not engage in sexual harassment—for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior. Eg. Looking somebody up and down; kissing, howling, or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody’s sex life; etc.
- k. Not engage in sexual favors—for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading, or exploitative behavior.
- l. Unless there is full consent by all parties involved, I shall not have sexual interactions with members of the surrounding communities including PMU staff. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex— such sexual activity is considered “non-consensual” within the scope of this Code.
- m. I shall not engage in sexual activity with anyone under the age of 18 years.
- n. Consider reporting through the Grievance Mechanism of the LWEP/LSP or to my supervisor/manager any suspected or actual SEA/SH or VAC by a fellow worker, whether employed by my employer or not or any breaches of this Code of Conduct.

3.0 With Regard to Children Under the age of 15:

Wherever possible, I shall:

- a. Ensure that another adult is present when working in the proximity of children.
- b. Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
- c. Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.
- d. Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium (see also “Use of children's images for work-related purposes” below).
- e. Refrain from physical punishment or discipline of children.

- f. Refrain from hiring children for domestic or other labor that is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
- g. Comply with all relevant local legislation, including labor laws in relation to child labor.

4.0 Use of Children's Images for work Related Purposes:

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

- a. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images;
- b. 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 shall be used;
- c. Ensure photographs, films, videos, and DVDs are presented to children in a dignified and respectful manner and not in a vulnerable or submissive manner.
- d. Ensure children should be adequately clothed and not in poses that could be seen as sexually suggestive;
- e. Ensure images are honest representations of the context and the facts;
- f. Ensure file labels do not reveal identifying information about a child when sending images electronically.

5.0 Sanctions

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

- a. Informal warning.
- b. Formal warning.
- c. Additional Training.
- d. Loss of up to one week's salary.
- e. Suspension of employment (without payment of salary), for a minimum period of one month up to a maximum of 6 months.
- f. Termination of employment.
- g. Report to the police if wanted.

I understand that it is my responsibility to ensure that the environmental, social, GBV, and health and safety standards are met. I shall also adhere to the project's occupational health and safety management plan. And that I shall avoid actions or behaviors that could be construed as SEA/SH or VAC. Any such actions shall be a breach of this Individual Code of Conduct.

I do hereby acknowledge that I have read the foregoing Individual Ethical Code of Conduct for the Liberia Women Empowerment project, do agree to comply with the standards contained herein, and understand my roles and responsibilities to prevent and respond to ESHS, OHS, SEA/SH and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to take action mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Name of Staff: _____

Position: _____

Signature: _____

Date: _____

Tel: _____

ANNEX 2: CODE OF CONDUCT

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

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

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

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

Non-Discrimination and Harassment

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

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

Freedom of Association

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

Environment, Health and Safety

----- (*insert company name*) is very much committed to as far as reasonably possible, providing services and products in a safe and responsible manner with due care to employees, customers,

contractors, visitors and the general public. As a minimum requirement, the company shall meet their specific statutory legal, health, safety, security and environmental obligations.

The goals across the organization are synonymous:

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

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

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

Work Environment and Compensation

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

Hours of Work and Work Scheduling

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

Slavery, Human Trafficking, Forced Labor and Child Labor

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

----- (*insert company name*) informs its employees, contractors and vendors about this Code. We encourage our partners and vendors to adopt and enforce concepts similar to this Code. Employees who believe there may have been a violation of this Code report it through confidential established channels. ----- (*insert company name*) may conduct assessments, as needed, to measure compliance. ----- (*insert company name*) will periodically review this Code to determine whether revisions are appropriate.

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

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

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

Expectations For Our Sub-contractors / Suppliers/ Workers

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

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

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

I,,

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

Dated