

GOVERNMENT OF LIBERIA  
**MINISTRY OF YOUTH & SPORTS**

Additional Financing

for Scaling up Recovery of Economic Activity for  
Liberian Informal Sector Employment (REALISE)  
PROJECT

(P179035)



**LABOR MANAGEMENT PROCEDURES**

**November 2022**

## ACRONYMS AND ABBREVIATIONS

AF	Additional Financing
AFD	Agence Française De Développement
CBO	Community-Based Organization
CLAS	Community Livelihood and Agricultural Support
CERC	Contingency Emergency Response Component
COC	Community Oversight Committee
COVID-19	Corona Virus Disease 2019
CSC	County Steering Committee
EPA	Environmental Protection Agency
ESF	Environmental Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environment and Social Standard
FGD	Focus Group Discussion
GBV	Gender-Based Violence
GM	Grievance Mechanism
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
IA	Implementing Agency
IGRMC	Institutional Grievance Redress Management Committee
LACE	Liberia Agency for Community Empowerment
LHSR	Liberia Household Social Registry
LIPW	Labor-intensive public works
LMP	Labor Management Procedures
LRA	Liberia Revenue Authority
LSSNP	Liberia Social Safety Nets Project
LYEEP	Liberia Youth Employability and Empowerment Platform
M&E	Monitoring and Evaluation
MFDP	Ministry of Finance and Development Planning
MGCSP	Ministry of Gender, Children and Social Protection
MIS	Management Information System
MoL	Ministry of Labor
MYS	Ministry of Youth and Sports
NGOs	Non-Governmental Organizations
OHS	Occupational Health and Safety

PAPs	Project Affected Persons
PIU	Project Implementation Unit
POM	Project Operation Manual
PW	Public Work
PSC	Project Steering Committee
PMT	Project Management Team
REALISE	Recovery of Economic Activity for Liberian Informal Sector Employment
SBS	Small Business Support
SCT	Social Cash Transfer
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SGBV	Sexual and Gender-Based Violence
WB	World Bank
WGRC	Workplace Grievance Redress Committee
WGRMC	Workers Grievance Redress Management Committee

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## 1.0 INTRODUCTION

The Labor Management Procedures (LMP) are intended to provide the framework to address the specific labor-related risks and impacts that are anticipated to occur because of the implementation of the Recovery Economic Activity for Liberian Informal Sector Employment (REALISE) Project. The LMP set out a formal system by which the Ministry of Youth & Sports (MYS)/Liberia Agency for Community Empowerment (LACE) and Ministry of Gender, Children Social Protection (MGCSP), together with other stakeholders and subproject contractors, will manage labour-related risks and implement mitigation measures that will avoid or reduce the significance of labour-related impacts on workers, community health, safety, and security. This LMP will further be updated into a plan by the Sub Project Contractors during implementation.

The Labor Management Procedures (LMP) is updated to provide the framework to address the specific labor-related risks and impacts that are anticipated to occur because of the implementation of the additional Financing and scaling up of Recovery Economic Activity for Liberian Informal Sector Employment (AF-REALISE) Project, the LMP has been updated to cover the new activities and geographical areas where people will be hired. The Development Objective of the AF-REALISE project is to ***increase access to income-earning opportunities for the vulnerable in the informal sector in response to crises, expand income and livelihood support to poor and food insecure households, and improve efficiency in managing social protection programs in Liberia***. The project has six (6) components namely: Component 1—Grant Support to Vulnerable Households to Revive or Start Small Businesses, Component 2—Temporary Employment Support and Employability Development for Vulnerable Workers, Component 3—Capacity Building and Project Implementation and Coordination, Component 4—Contingency Emergency Response Component, Component 5 - Community Livelihood and Agriculture Support and Component 6 - Social Cash Transfer.

The LMP has been developed with the purpose of protecting the health, safety, rights, and well-being of project workers who will be engaged during the implementation of the REALISE 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 labor requirements including the World Bank's Standard on Labor and Working Conditions (Environment and Social Standard: ESS 2). The LMP is a living document, which is initiated early in project preparation, and is reviewed and updated throughout the development and implementation of the AF-REALISE project.

The scope of this LMP will cover all aspects of the AF based on the new component's activities and geographical areas, which 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, labor and working conditions, remuneration, management of worker relationships and Occupational Health and Safety (OHS)

(Environment and Social Standard: ESS 4 as well as work-based grievance redress mechanisms. The project will attract a considerable number of workers given the high unemployment rate in Monrovia and its environs. The total number of workers to be employed on the project is not known at this stage. However, it is estimated that Component 2 is expected to hire at least 12,000 community workers. Several staff (direct workers) will be hired on the PMT for the day-to-day running of project activities. Similarly, Component 1 will also require the services of several service providers. Therefore, it could be estimated that between 12,000 to 12,500 workers will be hired throughout the lifecycle of the project. The LMP also includes measures to address risks related to the management of workers engaged by third parties or contractors and sub-contractors, and the management of workforce-related risks within the supply chain. 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 Redress Mechanism,
- Gender Based Violence (GBV), Preventing Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) (GBV/SEA/SH)
- OHS

## 2.0 PROJECT DESCRIPTION

The parent Recovery of Economic Activity for Liberian Informal Sector Employment - REALISE project (P174417) was financed through a **US\$5 million IDA credit and a US\$5 million grant**. The project aimed to increase income earning opportunities for vulnerable households in the informal sector whose livelihoods have been negatively impacted by the COVID-19 pandemic. Interventions under the project target to benefit 19,000 households and vulnerable workers in the informal sector in urban Montserrado County (Greater Monrovia). The project had the following four components: (i) grant support to vulnerable households to revive or start small businesses; (ii) temporary employment support and employability development for vulnerable workers; (iii) capacity building and project implementation and coordination; and (iv) Contingency Emergency Response Component - CERC. Continued to be faced with multiple challenges, the government requested the World Bank's financial and technical support to coordinate with development partners an increase of safety nets intervention coverage through an additional financing to REALISE (P179035) in the amount of **US\$30.5 million**. REALISE AF is designed to increase access to income earning opportunities for the vulnerable in the informal sector in response to the COVID-19 crisis in Liberia. The project has six components including the following: (i) Component 1: Grant Support to Vulnerable Households to Revive or Start Small Businesses, (ii) Component 2: Temporary Employment Support and Employability Development for Vulnerable Workers, (iii) Component 3: Program Implementation, Capacity Building, and Coordination, and (iv) Component 4: Contingency Emergency Response Component (CERC), (v) Component 5: Community Development and Agriculture Support, Component and (vi) Component 6: Social Cash Transfer and Strengthening of the National Social Protection System . The project builds on the implementation experience of the Youth Opportunities Project (YOP). Typical activities/interventions expected from the project are summarized in the table below:

**Table 1. Summary of scaled-up REALISE project interventions.**

No.	Project Component	Description	Type of proposed activities/sub-projects
1.	Component One	To revive or Start Small Businesses	<ul style="list-style-type: none"> <li>• Provide grant to purchase goods or equipment/tools (tailoring machines, block making etc.</li> <li>• Provide trainings.</li> <li>• Provide technical support to start new enterprises in the informal sector in urban areas</li> </ul>
2.	Component Two	To promote access to temporary employment opportunities through Labor-Intensive Public works (LIPW) for vulnerable workers while increasing benefits for community well-being.	<ul style="list-style-type: none"> <li>• Provide employment under Waste and Sanitation Management (to include beach and waterways cleaning),</li> <li>• Provide employment under Maintenance and Rehabilitation of community streets (to include drainage cleaning);</li> <li>• Provide employment under Supplementary Healthcare activities, Teaching/Community Education support activities for school going children, among others.</li> </ul>

3.	Component Three	Support to Implementing Entities.	<ul style="list-style-type: none"> <li>• Support Staff cost at central office and county level.</li> <li>• Support cost for capacity and systems building for project team, service providers, county and community structures.</li> <li>• Support cost for Targeting and recruitment processes.</li> <li>• Support cost for Equipment and other services required to enhance accountability and transparency in implementation of project.</li> </ul>
4.	Component Four	Contingency Emergency Response Component (CERC)	<ul style="list-style-type: none"> <li>• No activities unless CERC is activated</li> </ul>
5.	Component Five	Provide immediate consumption smoothing support for vulnerable youth, women, elderly, and other community members struggling to find gainful livelihood opportunities.	<ul style="list-style-type: none"> <li>• Support operations (agriculture, agro-processing, light manufacturing, logistics service.</li> <li>• Support minimum rehabilitation of walkways, roadside brushing, town halls, bridges and etc.</li> </ul>
6.	Component Six	Given the need to deploy sustainable mechanisms for reaching out to and supporting the poor and vulnerable.	<ul style="list-style-type: none"> <li>• Support cost for Equipment and other services required to enhance accountability and transparency in the implementation of project.</li> <li>• Social Cash Transfer (SCT) Program. preference will be given to females to serve as the cash recipient on behalf of their households</li> <li>• Provide income support to poor and food insecure households in selected counties as well as support strengthening of the national social protection system</li> </ul>



## 3.0 ANTICIPATED LABOR USE FOR THE PROJECT

### 3.1 CATEGORIZATION OF THE WORKFORCE

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.

#### 3.1.1 DIRECT WORKERS

##### **Project Management Team (PMT)**

The parent project currently comprises one National Project Coordinator (MYS) a Deputy Project Coordinator (LACE), key technical staff (monitoring and evaluation officer, public works and employability officer), fiduciary specialists (financial management officer, procurement officer) who is responsible for all financial management and procurement related activities under the project, and safeguards specialists (environmental officer and social safeguards officer) to support, monitor and report on the implementation of the Environmental and Social Commitment Plan (ESCP). With the AF, the PMT will have the following key officers: (i) National Project Coordinator; (ii) National Social Protection Coordinator, (iii) Program Managers for economic inclusion and social assistance programs; (iv) Procurement Officer, (v) Financial Management Officer; (vi) Communications Officer; (vii) M&E Officer; (viii) Grievance Redress Officer, (ix) Social and Environmental Officers. Key specialists and other relevant officers deemed necessary for the implementation of various interventions will form part of the PMT as well. These are direct workers responsible for overall project management.

##### **Short Term Technical Staff**

In addition to the positions required for the full duration of the Project, the Project may directly hire other technical staff for a limited duration based on specific needs.

All these staff, including the civil servants assigned to serve on the PMT, 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 PMT, 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 need as required under ESS2 will be considered, and the measures adopted by the project for addressing occupational health and safety issues, including those specifically related to COVID-19, will apply to them.

### **3.1.2 CONTRACTED WORKERS**

A contracted worker is a worker employed or engaged by a third party to perform work or provide services related to the core functions of the project, where the third-party exercises control over the work, working conditions, and treatment of the project worker. Components 1, 2, 5, and 6 of the projects will require the services of several service providers. Some of the workers hired under this component will fall into the category of contracted workers.

### **3.1.3 PRIMARY SUPPLY WORKERS**

These are workers employed or engaged by a primary supplier, providing goods and materials to the project, over whom a primary supplier exercises control for the work, working conditions, and treatment of the person. It is required that the goods or materials be provided directly to the project for its core functions on an ongoing basis to be considered as a primary supplier. Given the activities that will be financed under this project, the workers who will be hired on the project will mostly be community workers and direct workers. It is unlikely that the risks associated with primary supply workers will be a major concern to this project.

### **3.1.4 COMMUNITY WORKERS**

The Projects will include the use of community workers in circumstances defined in paragraph 34 of ESS2. The LIPW beneficiaries will be community workers engaged in small-scale community-based public works subprojects. The number of community workers will vary throughout the project lifecycle. It is estimated that the project will hire at least 12,000 workers under this component. Additionally, the project is designed and conducted for the purpose of fostering community-driven development.

### **3.2 MIGRANT WORKERS**

The project is not expected to hire some migrant workers- local or international. The project as designed is expected to recruit most of the workers from urban communities ( Montserrado and Margibi) and rural communities (Capemount, Bassa, Gbarpolu, Rivercess, River Gee, Sinoe, Nimba, Grand Kru, Lofa, Bong, Bomi, and Grand Gedeh) Counties where project activities will be carried out and other parts of the country.

### **3.3 TIMING OF LABOR REQUIREMENTS**

The direct workers (PMT staff) will be required full-time and retained for the project duration. Some other workers such as experts/consultants will be hired on a demand basis throughout the project lifecycle. The timing for recruitment of community workers is not known at this stage. However, it is expected that 60 days of labor will be guaranteed under the public works component. Once the project is approved and the overall procurement plan which includes the public works sub-projects is finalized, the LMP will be updated accordingly to include additional information on the timing and sequencing of labor.

**Table 2: Overview of labor use on the scaled up REALISE Project**

<b>Workers Type</b>	<b>Number of Workers</b>	<b>Residents</b>	<b>Imported/ Foreign Workers</b>	<b>Staff Under 18</b>	<b>Timing of Engagement</b>	<b>Type of Job or Skills</b>
<b>Direct Workers (PMT and seconded staff)</b>	(approx.) 35	unknown	(approx.) 20	0	Some will be at the end of end of contract or end of project.	Technical & Financial Staff including E&S specialist
<b>Contracted Workers (Consultants)*</b>	100	unknown	5	0	End of contract/deliverable	Technical & Financial Staff and workers
<b>Primary Supply Workers</b>	Not identified*	Not identified**	Not identified**	Not identified**	End of contract/deliverable	Not identified**
<b>Community Workers</b>	12,000	12,000	none	0	Implementation of Component 2	Not Identified**

\*Provide details

\*\* To be updated when the beneficiaries will be identified

## 4.0 POTENTIAL LABOUR RISKS

From the anticipated project activities, potential labor risks have been identified which must be monitored closely by the PMT and project contractors during project implementation to avoid any escalation. These are summarized in Table 3 below.

**Table 3: 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.</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.	<p>Risk of Contracting COVID-19</p>	<p>Continue to raise awareness of COVID-19 best practices for project site to workers.</p> <p>Use a shift system to decongest workers from highly congested areas/ rooms.</p> <p>Enforce national COVID-19 protocols are adhered to.</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 more local labor.</p> <p>Sensitize the workforce and community on the GBV action plan and implement it.</p> <p>Provide robust grievance redress mechanism for GBV/SEA/SH risks management and code of Conduct.</p> <p>Workers are to sign a Code of Conduct (COC). See Section/paragraph 10</p>

4.	Child labor	<p>Sensitize workers and surrounding communities on issues of child marriage or Labor.</p> <p>Restrict under-aged from doing business on the project site.</p> <p>Restrict workers from buying merchandise from children.</p> <p>Put in place and make known reporting mechanisms for child marriage or labor.</p> <p>Strengthen pre-employment screening systems to prevent the hiring of children.</p> <p>Routine monitoring of project sites to confirm no underage is hired and involved in the work on the project site</p>
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.	Poor conditions of service	<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.	Discrimination and exclusion of women and other vulnerable groups	<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 hiring more local labor.</p> <p>Provide systems to ensure equal opportunity for all regardless of gender, ethnic and social status.</p>
9	<p>Inadequate Grievance Mechanism (GM) to handle complaints and concerns for all the Project Workers</p>	

## 5.0 OVERVIEW OF LABOR POLICY AND LEGISLATION:

### 5.1 TERMS AND CONDITIONS

#### CONSTITUTION OF THE REPUBLIC OF LIBERIA

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

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

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

#### LABOR LAWS OF LIBERIA

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

#### DECENT WORK ACT, 2015

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

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

The Employment Act of Liberia strictly prohibits discrimination of employees based on race color, national extraction, ethnicity, social origin, religion, political opinion, sex, marital status, family responsibilities, or disability. An employee also has the right, by law, to remove himself or herself from a work situation that he or she reasonably believes presents an imminent danger to life or health. Below is the summary of relevant provisions of the Decent Work Act, of 2015.

## **2.2 FREEDOM FROM FORCED OR COMPULSORY LABOR**

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

## **2.3 FREEDOM FROM THE WORST FORMS OF CHILD LABOR**

- a) Except as elsewhere provided in this Act, no person shall employ or cause a child to be employed.
- b) Without limiting the scope of the preceding provision, the following forms of work by children are absolutely prohibited:
  - i. all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labor, including forced or compulsory recruitment of children for use in armed conflict.
  - ii. the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances.
  - iii. the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties; and



- iv. Work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or welfare of children.
- c) The Minister may make regulations that identify work prohibited under paragraph b) iv), and other forms of work for children that shall be absolutely prohibited.

A person shall not directly or indirectly cause, permit, or require a child to participate in a form of work that is absolutely prohibited by or pursuant to this section.

#### **21.2 MINIMUM AGE FOR EMPLOYMENT IN LIBERIA**

The minimum age for employment on the project will be in line with the requirements of Liberia Labor Law since the Labor Law specifies a higher age than that specified ESS2 para. 17. Part II, Section 2.3, of the Decent Work Act prohibits child labor. The Act defines a child as a person under the age of 18. During the recruitment of workers, it is likely that a worker below 18 years might be selected. To avert the risk of child abuse, the Labor Management Procedure will be updated to include additional measures for mitigating the risk of child abuse. The Act also prohibits the following:

- 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, particularly 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.

The Act prohibits children from engaging in hazardous work. It defines hazardous work as work involving the following:

1. work that exposes children to physical, psychological, or sexual abuse.
2. work underground, underwater, at dangerous heights, or in confined spaces.
3. work with dangerous machinery, equipment, and tools, or which involves the manual handling or transport of heavy loads.
4. 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
5. 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.

**Therefore, the minimum age for employment under this project is set at 18. No child, as defined by the Liberian Labor Law, will be employed on this project.**

It is the contractor's responsibility to establish verifiable systems and procedures to implement this age requirement for staff under its control. The PMT will monitor this from time to time to ensure compliance. The system to be used may include, but not limited to, the use of valid national identification card, voter's registration card, birth certificate, passport, and driver's license. Whenever it is brought to the attention of the PMT or the project implementing entities of the presence of a person or persons below the minimum age of employment in the employ of the contractor, the Employer may investigate immediately and, if proven, request the contractor to immediately terminate said person's contract, while paying all due benefits, and remove them from site immediately.

The project will ensure that direct staff and community workers who will be directly engaged by the project also meet this requirement.

#### **2.4 EQUAL PROTECTION**

- a. All women and men are entitled, without distinction, exclusion, or preference to enjoy and 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:
  - Race, tribe, indigenous group, language, color, descent, national, social, or ethnic extraction or origin, economic status, community, or occupation.
  - Immigrant or temporary resident status.
  - Sex, gender identity, or sexual orientation.
  - Marital status or family responsibilities.
  - Previous, current, or future pregnancy or breastfeeding age.
  - Creed, religion, or religious belief.
  - Political affiliation or opinion, or ideological conviction.
  - Physical or mental disability.
  - Health status including HIV or AIDS status, whether actual or perceived.
  - Irrelevant criminal record, the acquittal of a crime or dismissal of criminal prosecution against them; or
  - Personal association with someone possessing or perceived to possess one or more of these attributes.

## **2.5 RIGHT TO EQUAL REMUNERATION**

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

## **2.6 RIGHTS TO FORM ORGANIZATIONS AND TO BARGAIN COLLECTIVELY**

- a. All employers and workers in Liberia, without distinction whatsoever, may establish and join organizations of their own choosing, without prior authorization, and subject only to the rules of the organization concerned.
- b. Subject to this Act:  
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 employers and workers and their organizations may: (1) bargain collectively; and (2) engage in strike or lockout action in accordance with Chapter Forty-one.

## **2.7 PROHIBITION OF DISCRIMINATION**

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

## **2.8 PROHIBITION OF SEXUAL HARASSMENT**

- a. A person shall not directly or indirectly sexually harass a worker:
  - i. in any employment practice; or
  - ii. 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 which affects that person's job; or
  - ii. sexual conduct that creates an intimidating, hostile or humiliating working environment for the person that is subject to that conduct.
- c. Sexual conduct means: i) conduct of a sexual nature, whether physical, verbal, or nonverbal; or ii) conduct based on sex affecting the dignity of women or men.

## **5.2 OCCUPATIONAL HEALTH AND SAFETY**

### **LABOR LAW OF LIBERIA ON WORKMEN'S COMPENSATION**

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

### **DECENT WORK ACT, 2015**

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

#### **25.1 GENERAL DUTIES OF EMPLOYERS**

Every employer shall ensure so far as is reasonably practicable the safety and health at work of all workers they have engaged.

Without limiting the scope of the preceding provisions, an employer contravenes their obligation under this section by failing:

- i. to provide and maintain plants and systems of work that are safe and 70 without risks to health.

- ii. to plan for ensuring safety and absence of risks to health in connection with the use or operation, handling, storage or transport of plant and substances.
- iii. to provide, in appropriate languages, such information, instruction, training and supervision as may be necessary to ensure the safety and health of workers they have engaged and to take such steps as are necessary to make available in connection with the use at work of any plant or substance adequate information in appropriate languages:
  - about the use for which the plant is designed and about any conditions necessary to ensure that, when put to that use, the plant will be safe and without risks to health; or
  - about any research, or the results of any relevant tests which have been carried out, on or in connection with the substance and about any conditions necessary to ensure that the substance will be safe and without risks to health when properly used.
- iv. as regards any workplace under the employer's control to maintain it in a condition that is safe and without risks to health; or
- v. as regards any workplace under the employer's control to provide and maintain means of access to and egress from it that are safe and without any such risks; and
- vi. to provide and maintain a working environment for workers they have engaged that is safe and without risks to health, and adequate as regards facilities for their welfare at work.

For the purposes of this section, any plant or substance is not to be regarded as properly used by a person where it is used without regard to any relevant information or advice relating to its use, which has been made available by the person's employer.

## **25.2 DUTY OF EMPLOYER TO FORMULATE SAFETY AND HEALTH POLICY**

It shall be the duty of every employer or self-employed person to develop, as appropriate in consultation with workers of the employer, and with such other persons as the employer considers necessary, a policy relating to occupational safety and health.

The policy shall enable effective cooperation between the employer and the workers in promoting and developing measures to ensure the workers' safety and health and the organization and arrangements for the time being in force for carrying out that policy.

Other key national policies and labor legislation regarding occupational health and safety include:

### **THE PUBLIC HEALTH LAW - TITLE 33 OF THE LIBERIAN CODE OF LAW REVISED OF 1976**

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

## The National Health Policy and Plan 2011

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

**Table 4: Comparative Table of ESF and the National Requirements of Liberia**

ESF Objectives	National Requirements	Remarks on Similarities/Actions
<p><b>ESS2</b></p> <ul style="list-style-type: none"> <li>To provide every employee with written particulars of employment</li> </ul>	<p>Decent Work Act 2015</p> <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> <p>i) the name of the employer and the place of employment.</p> <p>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.</p> <p>iii) the nature of the employment and position to be held.</p> <p>iv) the duration of the employment.</p> <p>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> <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> <p>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:</p> <p>(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.</p> <p>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>	<p>National requirement conforms to ESS2 and shall be adhered to during the implementation of the project.</p>
<ul style="list-style-type: none"> <li><b>To promote safety and health at work</b></li> </ul>	<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> <p>a) secure the safety, health and welfare of employees and other persons at work.</p>	<p>The national requirement fully satisfies ESS2 and will be adhered to during the</p>

	<p>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.</p> <p>c) ensure that the safety and health of members of the public are not exposed to risks arising from work or workplaces.</p> <p>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</p> <p>e) develop and promote a national preventative safety and health culture, meaning a culture:</p> <p>i) in which the right to a safe and healthy working environment is respected at all levels.</p> <p>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</p> <p>iii) where the principle of prevention is accorded the highest priority.</p> <p>Section 4.2 provides some specific definitions relative to Occupational Health and Safety concerns. Including amongst others</p> <p>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>	<p>implementation of the project.</p>
<ul style="list-style-type: none"> <li>• <b>To promote the fair treatment of, non-discrimination, and equal opportunity of project workers</b></li> </ul>	<p>Section 2.7 of the Decent Work Act prohibits discrimination in the workplace. It specifically states that.</p> <p>a) No person shall discriminate against a person who works or who seeks to work in Liberia in an employment practice.</p> <p>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> <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:</p> <p>i) on a ground identified in section 2.4; or</p> <p>ii) because a person has exercised or sought to exercise or is entitled to the enjoyment of any right conferred by this Act.</p> <p>d) It is not unlawful by virtue of this section:</p> <p>i) to distinguish, exclude or prefer any individual:</p> <p>(1) based on an inherent requirement of a particular job; or</p> <p>(2) while implementing affirmative action measures consistent with the purposes of this Act.</p> <p>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.</p> <p>e) Affirmative action measures mean measures to redress the disadvantages in employment experienced by persons, groups, or</p>	<p>Basically, the same in objective. The Project shall conform to the national requirements.</p>



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.

- **To prevent the use of all forms of forced labor and child 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.

Basically, the same. The Project shall conform to the national requirements.



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:

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**

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:

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

<p><b>workers in a manner consistent with national law.</b></p>	<p>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</p> <p>ii) employers and workers and their organizations <b>may</b>:</p> <p>(1) bargain collectively; and</p> <p>(2) engage in strike or lockout action in accordance with Chapter Forty-One of the Act.</p> <p>Section 2.11 particularly states that:</p> <p>a) No person may do, or threaten to do, any of the following:</p> <p>i) require a worker:</p> <p>(1) not to be or not to become a member of an organization of workers; or</p> <p>(2) to give up membership of an organization of workers.</p> <p>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</p> <p>(1) membership of an organization of workers.</p> <p>(2) participation in the formation of an organization of workers.</p> <p>(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.</p> <p>(5) disclosure of information that the worker is lawfully entitled or required to give to another person.</p> <p>(6) exercise of any right conferred by this Act; or</p> <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"> <li><b>To provide project workers with accessible means to raise workplace concerns.</b></li> </ul>	<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> <p>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.</p> <p>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>	<p>In alignment with ESS2. The project shall follow the national requirements.</p>
<ul style="list-style-type: none"> <li><b>To protect project workers, including</b></li> </ul>	<p>Section 2.4 of the Decent Work Act 2015 provides equal protection for all workers and potential workers. The section states thus:</p>	<p>In full alignment with ESS2. The project shall meet</p>

**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.**

- 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.

the national requirements.

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**

<ul style="list-style-type: none"> <li>• <b>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.</b></li> </ul>	<p>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:</p> <p>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.</p>	<p>National requirements in full conformity with ESS4. The Project will adhere to these requirements.</p>
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## 6.0 RESPONSIBILITIES

The overall responsibility for the implementation of all aspects of the project lies with the PMT. The PMT will have several staff, including a Project Coordinator, Environmental and Social Safeguard Officers, Procurement Officer, Financial Management Officer, and other staff, as needed throughout project implementation.

The PMT under the direct supervision of the Project Coordinator assisted by the Environmental Safeguard Officer and Social Safeguard Officer will coordinate the engagement and management of project workers and ensure that the following are adhered to, as appropriate:

- i. Implement this labor-management procedure.
- ii. Ensure that civil works contractors comply with these labor-management procedures and prepare OHS plans before starting work as part of the C-ESMPs that shall be maintained/ enforced throughout Project implementation.
- iii. Ensure the contracts with the contractors are developed in line with the provisions of this LMP and the project's ESMF, as detailed in the Project Operations Manual.
- iv. Monitor to verify that contractors are meeting labor and OHS obligations toward contracted and subcontracted workers as required by Liberian law and respective contracts between the implementing agencies and the contractors.
- v. monitor contractor's and subcontractors' implementation of the LMP.
- vi. Monitor compliance with OHS standards at all workplaces in line with Liberian OHS legislation.
- vii. Monitor and implement training on LMP and OHS for project workers.
- viii. Ensure that the grievance redress mechanism for project workers is established and implemented and that workers are informed of its purpose and how to use it;
- ix. Monitor how the GRM is working including what are the most common complaints, and how successful the GRM is in resolving these; have a system for regular monitoring and reporting on labor and OHS performance; and
- x. Monitor implementation of the Worker Code of Conduct including a clause on SEA/SH and GBV.

LMP and OHS responsibilities of the Contractors include the following:

- i. Follow the LMP and OHS requirements in line with the ESMF provisions and stated in the contracts signed with Implementing Agency. If the number of workers (direct plus contracted) is above 50, then Contractors will develop their own LMPs and OHS plans.

- ii. Supervise the subcontractors' implementation of LMP and OHS requirements.
- iii. Maintain records of recruitment and employment of contracted workers as provided in their contracts.
- iv. Clearly communicate job descriptions and employment conditions to all workers.
- v. Make sure every project worker hired by the contractor/subcontractor is aware of the PMT dedicated or hotline phone number, email address, and web portal through which anyone can submit grievances and the structure the of worker Grievance Redress Mechanism (GRM).
- vi. Provide induction (including social induction) and regular training/briefing to employees in labor protection requirements, including training on their rights on safe labor under Liberian law, on the risks of their jobs, and on measures to reduce risks to the acceptable levels
- vii. In collaboration with PMT Social Safeguard Specialists and contractor's manager, conduct training on LMP and OHS to manage subcontractor performance.
- viii. Ensure that all contractor and subcontractor workers understand and sign the Code of Conduct prior to the commencement of works and supervise compliance with the Code.

## 7.0 PROCEDURES FOR LABOR MANAGEMENT

### 7.1 TERMS AND CONDITIONS

The terms and conditions of employment applying to workers in this project will largely depend on the nature of their employment contracts and shall be governed by the Liberian Labor Law.

The Project Implementation Agencies will ensure that:

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

### 7.2 NON-DISCRIMINATION AND EQUAL OPPORTUNITY

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

- Sub Project Contractors and their Sub Contractors shall treat workers equally and fairly with respect to all policies, conditions, and benefits of employment.
- Sub-Project Contractors and their Sub Contractors must ensure that employment decisions are based on relevant and objective factors (merit, experience, tasks,

skills, etc.), and that consistent procedures are followed in the decision-making processes.

- The company/employer should also ensure that its workers and suppliers are aware of its policy on non-discrimination and equal treatment in order to promote a culture of respect and zero-tolerance for discrimination.
- The contractors should ensure that adequate mechanisms are in place for workers to report workplace discrimination, bullying, or sexual harassment. These mechanisms should be able to promptly investigate all complaints and take appropriate preventive or disciplinary action.
- All workers must be informed of their rights and encouraged to use the mechanism without fear of reprisal. MYS/LACE/MGCSP well as Sub Project Contractors and their Sub Contractors shall designate specific staff (e.g. a workers' representative) to act as the workers' focal point on employment discrimination issues. Workers should be able to report discriminatory incidents to the focal point on a confidential basis. At the same time, the focal point should possess adequate knowledge to advise workers on national laws and contractor/employer policies regarding non-discrimination and the various remedies available.

### 7.3 WORKERS ORGANIZATION

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

#### **DIRECT WORKERS**

The terms and conditions of civil servants are guided by the national civil service regulations and other labor and employment legislation. The PMT consultants are guided by the terms and conditions of their contractual agreements.



## **CONTRACTED WORKERS**

The bidding and contractual documents for Components 1,2 3, 5& 6 (e.g., service providers) will refer to this LMP and the respective requirement to follow Liberia and WB standards for their contracted workers.

## **COMMUNITY WORKERS**

The terms and conditions of LIPW beneficiaries will be guided by the Project Operations Manual (POM), which stipulates among other things, the eligibility criteria to participate in public works. Other terms and conditions to guide the management of public work beneficiaries enrolled under public works will include:

- LIPW beneficiaries must be selected and enrolled from vulnerable households as defined in the POM; enrolment is voluntary.
- Eligible beneficiaries must be residents in the respective catchment area for at least 12 months and be at the age of 18 and above.
- Enrolled beneficiaries should be willing and able to undertake at least 4 hours of work per day for a period of 60 days (not continuously) for labor-intensive activities.
- Payment of cash transfers will be made monthly and will be conditional to the completion of work as per agreement within the sub-project plan.
- Failure to participate in public works (unexcused) will lead to forfeiting of payment.
- Sub-project supervisors are tasked to assess compliance with participation requirements.

PMT is responsible for ensuring adherence to all project requirements.

## **PRIMARY SUPPLY WORKERS**

The project's ability to influence its primary suppliers depends on the terms and conditions of contracts with the primary supplier. The project will ensure that the bidding and contractual documents for project activities that will require the services of primary suppliers will refer to this LMP and the respective requirement to follow Liberia and WB standards for their workers.

## **7.4 AGE OF EMPLOYMENT**

The minimum age for employment on the project will be in line with the requirements of Liberia Labor Law since the Labor Law specifies a higher age than that specified ESS2 para. 17. Section 21.2 of the Decent Work Act prohibits the employment of children under the age of 15 in full-time employment. However, Section 21.3 of the Act permits children under 15 years to be employed in light work provided:

- i. They may only work for a maximum of two hours a day and fourteen hours a week; and are employed in compliance with any prescribed procedures.
- ii. The work is not likely to be harmful to a child's health or safety, moral or material welfare or development; and is not such as to prejudice the child's attendance at school or their capacity to benefit from instruction.

The Act prohibits children from engaging in hazardous work. It defines hazardous work as work involving the following:

- i. work that exposes children to physical, psychological, or sexual abuse.
- ii. work underground, underwater, 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.

Notwithstanding, all direct staff (including all categories) employed for the purpose of the project will be over 18 years. Even though ESS2 and the Decent Work Act 2015 provides provision to employ minors at 14 and 15 years and above, it is not envisioned that a minor will be required to be employed as a direct project worker.

MYS/LACE/MGCSP and Sub-Project Service Provider shall be required to undertake a child labor risk assessment for each sub-project and activity following the under-listed steps:

- Identify communities and persons vulnerable to child labor risks as well as hazardous activities to children/minors through consultation with relevant Ministries, Non-Governmental Organizations (NGOs), and Community-Based Organizations (CBOs) in the Sub Project Catchment, review national legislations and ESS2 requirements on child and forced labor.
- Evaluate and prioritize risks.
- Decide on action to prevent or control the identified risks.
- Put in place the preventive and control measures through a prioritization plan.
- Monitoring, reviewing, and updating the established preventive and control measures daily. MYS/LACE/MGCSP, Sub-Project Service Provider, and their Sub Contractors shall create and keep a separate record of all project workers.

## 8.0 GRIEVANCE REDRESS MECHANISM

### 8.1 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 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 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>.

### 8.2 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 GBV risk assessment of the project is rated as Moderate. The project plans to reduce the gender gap and provide opportunities for women for training/work skills development in proximity to males, therefore, raising concerns for GBV/ SEA. These activities are likely to expose project women beneficiaries and workers to sexual exploitation and abuse as well as sexual harassment. Therefore, the project GRM will integrate GBV-sensitive measures, including multiple channels to initiate a complaint and specific procedures for SEA/SH, such as confidential and/or anonymous reporting with safe and ethical documenting of SEA/SH cases.

Unlike other cases, the project GRM will not investigate or resolve SEA/SH cases or provide redress to survivors. The role of the GRM will be to:

1. Treat the complainant with dignity and respect using a survivor-centered approach.
2. Refer the complainant to GBV service providers (i.e. healthcare, psychosocial support, legal aid) and the domestic legal system at the survivor's choice
3. Record only limited information about the incident to protect identity and dignity.
4. If the survivor chooses (after being given complete information), inform the PIU/project of the incident to assess perpetrator accountability.

Key to this process is the identification of GBV service providers. The project will identify GBV service providers in Monrovia and its environs. The project will identify key services

such as health care, psycho-social support, and legal aid/domestic justice system that exist in the project area. Other services to be identified will include livelihood support, shelters, and case management. The project will provide special training for staff responsible for managing SEA/SH cases. Below is the summary of the current GRM.

### 8.3 POTENTIAL COMPLAINTS AND GRIEVANCES STAGES

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

#### *Stage 1: Complaint Uptake*

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

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

When a complaint is received, a maximum of 5 days has been set for the WGRMC to resolve the complaint or respond to the complainant. This is so to make sure that grievances/complaints are resolved as early as possible. Once a complaint is received, the WGRMC shall assess whether the complaint or grievance is relevant or not. In a situation where the complaints are not related to the project, 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 MYS/LACE/MGCSP and the PMT for records.

#### *Stage 5: GRM Evaluation*

The Workers GRM evaluation shall be undertaken alongside other evaluation exercises for the project and output of the evaluation shall be shared with the Project Management, MYS/LACE/MGCSP and the Bank.

Contractors and/or project grantees shall appoint representatives to be the point of contact 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 Social Development Specialist to provide confidential support to the complainants. The Contractor shall notify the Project within 24 hours of learning of the incident.

The WGCR 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 3344/0775001000**), or in writing (**grm@realise.live**). Grievances can be made anonymously. A dedicated email and telephone number will be provided for reporting all grievances. 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 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.

#### 8.4 GRIEVANCE FOR GENDER-BASED VIOLENCE (GBV) ISSUES

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

- a) A separate GBV GRM system, potentially run by a GBV Services Provider or trained professionals 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 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 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.

## DATA SHARING

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

## 8.5 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>.



## 9.0 CONTRACTOR MANAGEMENT AND CODE OF CONDUCT

The project anticipates the engagement of contractors and consultants for various activities to be managed under the project and it will include various categories of personnel. To ensure fair competition and transparency, the selection of contractors/consultants will be based on the Bank's approved procurement procedure followed by the MYS/LACE/MGCSP, the government of Liberia and this will include.

- i. competitive bidding through transparent open advertising.
- ii. Shortlisting and selection; and
- iii. Contractual signing.

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

The employees/personnel/workers will sign a code of conduct. The code of conduct aims at preventing and/ or mitigating environmental and social risks within the context of the project. The social risks that may arise include but are not limited to GBV; VAC; HIV/AIDS infection and prevention and Occupational Health and Safety. The PMT / Contractors engaged in the project will be required to develop and implement a code of conduct that will commit them to creating and maintaining an environment that prevents social risks. The developed code of conduct will be reviewed by the Bank. The contractor/PMT will be required to communicate clearly to all those engaged in the project the behaviors which guard against any form of abuse and exploitation to prevent social risks.

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

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

Sub-Project Contractors shall notify their Supervising Consultant and the MYS/LACE/PMT within twelve (12) hours after the occurrence of any accident results in significant damage or loss of property, disability, or loss of human life, which could reasonably be foreseen to



have a material impact on the environment. They will submit to the same, no later than twenty-eight (28) days after the occurrence of such an event, a summary report thereof.

## ANNEXES

### ANNEX 1: WORKERS' GRIEVANCE LOG AND RESOLUTION FORM

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

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

**3. Contact Information Address:**

**Phone number:**

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

**5. Are there adverse impacts associated with this complaint/grievance. Yes/No 5a: List them:**

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

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

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

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

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

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

### **6. Review/Resolution**

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

Was Filer Present?: Yes /No

Was field verification of complaint conducted? Yes/ No

**Findings of field investigation:**

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

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Was agreement reached on the issues? Yes No

If agreement was reached, detail the agreement below:

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

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

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

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

Independent Observer

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

## ANNEX 2: CODE OF CONDUCT

This Code of Basic 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 .....