



COMMON MARKET FOR EASTERN AND SOUTHERN AFRICA

**INCLUSIVE DIGITALIZATION IN EASTERN AND SOUTHERN AFRICA (IDEA) MULTI-PHASE
PROGRAMMATIC APPROACH**

(P502532)

LABOUR MANAGEMENT PROCEDURE

27th January 2026

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ACRONYMS

| | |
|--------|---|
| ASCENT | Accelerating Sustainable and Clean Energy Access Transformation |
| CoC | Code of Conduct |
| COMESA | Common Market for Eastern and Southern Africa |
| DFS | Digital Financial Services |
| ESS | Environmental and Social Standard |
| FM | Financial Management |
| GIIP | Good International Industry Practice |
| GN | Guidance Notes |
| GRS | Grievance Redress Services |
| IDEA | Inclusive Digitalization in Eastern and Southern Africa |
| ICT | Information Communications and Technologies |
| ISP | Internet Services Providers |
| LMP | Labor Management Procedure |
| M&E | Monitoring & Evaluation |
| MPA | Multiphase Programmatic Approach |
| OHSPs | Occupational Health and Safety Plans |
| PDO | Project Development Objective |
| PCU | Project Implementation Unit |
| PrDO | Program Development Objectives |
| PWD | Persons with Disability |
| SEA | Sexual Exploitation Abuse |
| SH | Sexual Harassment |
| SRA | Security Risk Assessments |
| TA | Technical Assistance |

1.0 INTRODUCTION

1.1 Overview

The Common Market for Eastern and Southern Africa (COMESA) has partnered with the World Bank to support participating countries in implementing the Inclusive Digitalization in Eastern & Southern Africa (IDEA) in a regional Multiphase Programmatic Approach (MPA) for Eastern and Southern Africa, focusing on:

- (a) affordable, high-quality broadband and digital access;
- (b) interoperable and secure data platforms and trusted online transactions; and
- (c) high-impact digital applications in priority sectors – *initially social protection and financial services along with digital skills to enhance productive use.*

The MPA outlines an ambitious agenda for universal digital access through coordinated pillars and a menu of regional interventions.

The COMESA platform is to strengthen the enabling environment for expanded inclusive internet access and digital services in Eastern and Southern Africa. The COMESA operation contributes to reports on overall Program objectives.

This Labor Management Procedure (LMP) has been developed by COMESA¹ in consultation with the World Bank, to identify and manage risks associated with labor and working conditions under the IDEA Project. The LMP identifies labor requirements in line with applicable laws and standards and sets out the procedures for addressing labor conditions and risks associated with the IDEA Project in line with the World Bank Environmental and Social Standard 2 (ESS2) and Good International Industry Practice (GIIP). IDEA is a Multi-Programmatic Approach (MPA) with various participating countries.

The LMP is valid for the duration of the IDEA Project and shall apply to all project workers engaged under the project including full-time, part-time, temporary and seasonal workers. The Project scope does not provide or anticipate the employment of irregular migrant workers. Although international consultants may be recruited to offer specific services, their conditions of engagement will be as contained in their contracts and TORs. The LMP may be revised as the need arises in line with COMESA and World Bank requirements.

1.2 Purpose and Objectives of the LMP

The purpose of this LMP is to facilitate the identification of different types of workers that are likely to be involved in the implementation of the IDEA Project and sets out the ways in which those workers will be managed in accordance with the requirements of ESS2, GIIP and the labor laws of the participating countries.

The LMP will also provide a methodical and coherent approach to dealing with the labor-related issues, impacts and risks likely to emanate from the implementation of this Project whilst facilitating the identification of diverse types of Project workers likely to be involved in the Project.

¹ COMESA Member States are Burundi, Comoros, Congo, Democratic Republic of Congo, Djibouti, Egypt, Eritrea, Eswatini, Ethiopia, Kenya, Libya, Madagascar, Malawi, Mauritius, Rwanda, Seychelles, Sudan, Tunisia, Uganda, Zambia, and Zimbabwe.

The LMP identifies the main labor requirements and risks associated with the project and helps the Borrower/Recipient determine the resources necessary to address project labor issues. The LMP is a living document, which is initiated early in project preparation, and is reviewed and updated throughout development and implementation of the project.

Consistent with ESS2, this LMP seeks to:

- (a) Promote safety and health at the workplace;
- (b) Promote the fair treatment, non-discrimination, and equal opportunity of Project workers;
- (c) Protect Project workers, including vulnerable workers such as women and persons from communities meeting the ESS7 criteria;
- (d) Prevent the use of all forms of forced labor and child labor;
- (e) Support the principles of freedom of association and collective bargaining of Project workers in a manner consistent with COMESA rules and respective national laws; and
- (f) Provide Project workers with accessible means to raise workplace concerns.

1.3 Project Description

1.3.1 Project Development Objective

The IDEA Project Development Objective (PDO) is to strengthen the enabling environment for expanded inclusive internet access and digital services in Eastern and Southern Africa. The COMESA Secretariat will support the entire IDEA MPA and will track progress towards all Program Development Objectives (PrDO).

1.3.2 Project Components

The IDEA COMESA Regional Platform consists of the following components:

Component 1: Regional Harmonization and Planning Platform

This component focuses on helping countries work together more effectively to build an integrated regional digital market and plan smart investments. It will provide hands-on technical assistance and training to support the development of shared digital policies and standards, practical roaming frameworks, improved spectrum management approaches, and clear guidance on AI and other emerging technologies. The component also supports cross-border data frameworks and actions to attract private investment into digital infrastructure, including linkages to ASCENT where possible. To ensure investments are well targeted, it will finance user-friendly geospatial planning tools and least-cost models that help expand internet access in cross-border areas and priority public institutions.

Component 2: Regional Knowledge and Capacity Building

This component is designed to strengthen skills, systems, and collaboration across the region. It will develop practical toolkits that guide institutions through project preparation, procurement, financial management, environmental and social risk management, and monitoring and evaluation, all supported by a shared regional platform. The component will also support training and peer learning on topics such as digital safeguards, e-commerce frameworks, procurement, financial management, environmental and social practices, data systems, and results monitoring. Communication and outreach activities, delivered through

COMESA platforms, will promote gender inclusion and encourage stronger engagement from the private sector.

Component 3: Regional Project Coordination and Management

Establishes the regional Program Coordination Unit to coordinate with countries, report results, and manage fiduciary, E&S, and other implementation functions for the COMESA regional grant.

1.3.3 Project Beneficiaries

1.3.3.1 Citizens

Overall, the general population will benefit significantly from the program. An estimated 180 million people are expected to gain new or improved access to internet connectivity, while around 100 million people including refugees and persons with disabilities will benefit from digital identification systems and accessible technologies. In addition, more than 100 million people are expected to benefit from expanded digital services and income-generating platforms. Across all activities, at least 50 percent of the beneficiaries will be women, ensuring strong gender inclusion.

1.3.3.2 Firms

Many players across the ICT value chain will benefit from the program. ICT service providers such as mobile network operators, internet service providers, and cloud service providers will benefit from new infrastructure investments and procurement opportunities. Start-ups and entrepreneurship hubs will receive targeted technical assistance and grant support to help them grow and innovate. Micro, small, and medium enterprises will gain improved access to the internet, digital financial services, smart devices, and practical digital skills training, enabling them to become more productive and competitive. In addition, digital businesses more broadly will benefit from access to larger, more integrated regional markets, supporting expansion and cross-border growth.

1.3.3.3 Public Sector Institutions

Public institutions will also benefit significantly from the program. Ministries, regulatory bodies, and agencies responsible for ICT, trade, digital financial services, and data protection will receive technical and financial support to strengthen policies, regulation, and implementation capacity. At the same time, previously unconnected or underserved public institutions such as schools, health clinics, and government offices will benefit from new digital infrastructure, improving service delivery and access to essential public services.

2.0 OVERVIEW OF LABOUR USE ON THE PROJECT

2.1 Project Workers Categorization

Project workers, as it relates to ESS2, refer to workers who will be employed or engaged under the IDEA Project, whether as full-time, part-time, temporary, seasonal or migrant workers. The ESS2 categorizes Project workers into four broad categories:

- (i) **Direct Workers:** People employed or engaged directly by the Grantee (in this case COMESA Secretariat’s PCU and Consultants) to work specifically in relation to the Project;
- (ii) **Contracted Workers:** People employed or engaged by contractors (in this case workers of consultants) to perform work related to core activities of the Project, regardless of location;
- (iii) **Primary Supply Workers:** People employed or engaged by the Project’s primary suppliers of goods and materials for core Project activities; and
- (iv) **Community Workers:** People employed or engaged in providing community labour.

The IDEA Project will engage both direct workers and contract workers but will not engage in the services of primary suppliers or community workers.

2.2 Number of Project Workers

2.2.1 Direct workers

- (a) **Project Coordinating Unit (PCU)** - The staff complement comprises of the Project Coordinator, Digital Policy and Regulatory Expert, M & E Expert, Finance Expert, Procurement Expert, Digital Infrastructure Planning Expert, Stakeholder Engagement, Communications Expert and Administrative Assistant. The IDEA project will leverage the expertise of the ASCENT E&S team, in particular, the Environmental Specialist and the Social Safeguards Specialist. As such, the PCU will have approximately 8 to 10 staff recruited nationally and internationally on a full-time basis; and
- (b) **Consultants** – the PCU will be supported by national and/or international consultants, who will be hired on a part-time basis. The consultants will mainly be involved in the execution of technical tasks/studies across different Project components. The PCU will hire consultants with different expertise and maintain a database of approximately 20. From the pool and on a revolving basis, the PCU will fulfill requests from different Project beneficiaries.

2.2.2 Contracted workers

Contracted workers will consist of both locally and internationally recruited staff of consultancy firms engaged to undertake the technical studies to be performed under the TA aspects of the MPA Project implemented by COMESA. It is estimated, as necessary, that each sub-project will recruit between 3-10 local contracted workers on a temporary basis. Table 1 shows the worker category, estimated numbers and timing for both direct and contracted workers.

Table 1: Worker Classification

| Category | Description | Number | Mode of engagement | Timing |
|-----------------------|-------------|--|--------------------|--------------------|
| Direct workers | PCU Staff | 9 officers: Project Coordinator, Procurement Expert, Digital Policy and Regulatory Expert, M & E Expert, Finance Expert, Digital | Full time | All Project phases |

| Category | Description | Number | Mode of engagement | Timing |
|---------------------------|---------------|--|--------------------|-----------------|
| | | Infrastructure Planning Expert, Stakeholder Engagement and Communications Expert and Administrative Assistant. | | |
| | Consultants | A pool of 20 consultants to conduct various technical studies. | Part-time | Operation phase |
| Contracted workers | Local workers | 3-10 contracted workers for each sub-project supporting consultants in technical studies. | Temporary | Operation phase |

3.0 POTENTIAL LABOUR RISKS

Table 2 describes the project's key potential labor risks and their mitigation measures.

Table 2: Key labour risks and associated mitigation measures

| Key labor risk | Source of risk | Mitigation |
|---|---|--|
| Sexual Exploitation, Abuse and Harassment (SEA/SH) | There is potential for sexual exploitation and abuse of community members by TA staff, especially if the studies involve an extended period during field data collection; and sexual harassment among TA workers. | <p>Develop and implement a SEA/SH Action Plan which entail the following actions:</p> <ul style="list-style-type: none"> (i) Training and/or sensitization of project workers and affected stakeholders on SEA/SH (ii) Preparation and signing of a code of conduct (CoC) with key prohibitions on SEA/SH as a condition of employment in the project and before signing on to work on the project. (iii) Rolling out a SEA/SH sensitive GRM (iv) Implementing the Accountability and Response Framework |
| Occupational health and safety | Project workers may face occupational health and safety risks, including injuries or ill health arising from unsafe working conditions during technical assistance activities, fieldwork, site visits, and engagement with digital infrastructure. Risks include exposure to physical, ergonomic, and psychosocial hazards such as fatigue, stress, harassment, or unsafe behaviors, particularly in remote locations, during extended working hours, or where OHS supervision and procedures are inadequate. | <ul style="list-style-type: none"> • Develop and implement occupational health and safety plans (OHSPs) for the Project • Assure a safe working environment for all workers through complying with ESS2 requirements. • Provide regular training to workers on workplace hazards so that they have a safe working environment |

| Key labor risk | Source of risk | Mitigation |
|-----------------------|---|--|
| Security risks | Security remains a challenge in some IDEA MPA countries which may pose a threat to project workers who may face abduction, being held hostage, or being caught in crossfire in those countries. | <ul style="list-style-type: none"> • Conduct regular security risk assessments (SRA) prior to deployment of TA workers to security prone countries/areas to ensure the safety of Project workers (direct and contracted). • The Project will not sanction any use of force by direct or contracted workers in providing security except when used for preventive and defensive purposes in proportion to the nature and extent of the threat. Due diligence will be done to ensure the hired security firm are: (i) not implicated in past abuses; (ii) adequately trained (or determine that they are properly trained) in the use of force (and where applicable, firearms), and appropriate conduct toward workers and affected communities; and (iii) compliance with the applicable law and any requirements set out in the ESCP and the World Bank Good Practice Note on Assessing and Managing the Risks of Use of Security Personnel (October 2018). |
| Discrimination | Discrimination in relation to recruitment and employment of project workers is a potential risk. Such discrimination includes potential inappropriate treatment or harassment of Project workers due to sexual identity/orientation, gender, age, disability, ethnicity, or religion; potential exclusion or preferences with respect to recruitment, hiring, termination of employment, working conditions, or terms of employment made on the basis of personal characteristics unrelated to inherent work requirements; in training and development provision. | In this Project, no discrimination is acceptable as per COMESA rules and in line with ESS2 requirement which states that " <i>The Labor Management Procedures will set out measures to prevent and address harassment, intimidation, and/or exploitation</i> ", The Project supports equal opportunities for women, men and Persons with Disability (PWD), with emphasis on equal criteria for selection, remuneration, and promotion, and equal application of those criteria. Decisions relating to the employment or treatment of project workers will not be made based on personal characteristics unrelated to inherent job requirements. The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to |

| Key labor risk | Source of risk | Mitigation |
|-------------------------------------|---|---|
| | | training, job assignment, promotion, termination of employment or retirement, or disciplinary practices. Where national law is inconsistent with this paragraph, the project will seek to carry out project activities in a manner that is consistent with the requirements of this paragraph to the extent possible. Where there is an inconsistency between Zambian law and ESS2, the standard providing the greater protection to the worker will prevail. |
| Violation of workers' rights | <p>In line with ESS2, violation of workers' rights could occur, among others, if:</p> <ul style="list-style-type: none"> (i) Labor management procedures applicable to the project are not developed, which set out the way in which the different categories of project workers will be managed by COMESA and its Consultants. (ii) Project workers are not provided with information and documentation that is clear and understandable regarding their terms and conditions of employment, including their rights under national labor and employment law (which should include any applicable collective agreements), including their rights related to hours of work, wages, overtime, compensation and benefits. (iii) The information and documentation on workers' rights under the project is not provided in a timely manner, e.g., at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur. (iv) Project workers are not paid on a regular basis as required by national law and labor management procedures or if they are denied their other rights such as sick leave, maternity, or family leave, etc. (v) Project workers are not given written notice of termination of employment and details of severance payments in a timely manner, and if all the severance | Through pre-contractual due diligence, the Project will ensure that staff of all Project workers and outsourced contractors have working conditions and rights consistent with COMESA rules and ESS2. Where there is an inconsistency between the applicable COMESA member of country labor law and ESS2, the standard providing greater protection to the worker will prevail. |

| Key labor risk | Source of risk | Mitigation |
|----------------|--|------------|
| | <p>payments are not made to the worker before termination of the working relationship.</p> <p>(vi) Workers are denied the right to form and to join workers' organizations of their choosing and to bargain collectively without interference in countries where the national law recognizes workers' rights to form or join such organization the project will be implemented.</p> <p>(vii) Project workers are restricted from developing alternative mechanisms to express their grievances and to protect their rights regarding working conditions and terms of employment, in countries where national law restricts workers' organizations.</p> | |

4.0 LEGISLATIVE AND POLICY FRAMEWORK

4.1 COMESA Rules and Regulations

The COMESA Treaty addresses labour issues indirectly by providing the legal foundation for labour mobility across the region. Through Article 164, it commits member states to develop a protocol enabling the free movement of persons, labour, services, and the right of establishment and residence, even though it does not itself set out detailed labour rights or working conditions. These commitments are clarified in the 1998 COMESA Protocol on the Free Movement of Persons, Labour, Services, and the Right of Establishment and Residence, which allows citizens to work, provide services, or pursue self-employment in any member state under conditions similar to those of nationals. The protocol initially limits labour movement to skilled workers but envisions the gradual removal of all restrictions.

Labour standards are further strengthened through the COMESA Social Charter, which outlines principles on employment conditions, labour law, social protection, human resource development, gender equality, and decent work. To support implementation, COMESA has also developed instruments such as the Model Law on Immigration to help harmonize national labour mobility policies, though adoption has been slow. Together, these instruments show that while the treaty provides the overarching framework, the protocol and Social Charter supply the substantive guidance on labour mobility and worker protection within the COMESA region.

The contracts for consultants, project and temporary staff will be based on templates mutually agreed between COMESA and the Bank which will provide specific terms and conditions of service to be applied. COMESA staff rules and regulations shall only apply where it has been expressly provided for in the contract.

4.2 The World Bank Standards

The World Bank's stipulations related to labor are outlined in its ESS Standard (ESS2). This together with the World Bank Environmental, Health, and Safety (EHS) Guidelines helps the Borrowers/Grantees in promoting sound worker-management relationships and enhance the development benefits of a Project by treating workers in the Project fairly and providing safe and healthy working conditions. Key objectives of the ESS2 and the EGS guideline are to:

- (i) Promote safety and health at work;
- (ii) Promote the fair treatment equal opportunity of Project workers;
- (iii) Protect Project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate;
- (iv) Prevent the use of all forms of forced labor and child labor;
- (v) Support the principles of freedom of association and collective bargaining of Project workers in a manner consistent with national law; and
- (vi) Provide Project workers with accessible means to raise workplace concerns.

ESS2 applies to Project workers including full-time, part-time, temporary, seasonal, and migrant workers. Where civil servants are working in connection with the Project, whether full-time or parttime, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the Project.

Regarding Working conditions and management of worker relationships, the Borrower/Grantee will develop and implement written labour management procedures applicable to the Project. These procedures will set out the way in which Project workers will be managed, in accordance with the requirements of national law and the ESS. The procedures will address the way in which the ESS will apply to different categories of Project workers including direct workers, and the way in which the Borrower/Grantee will require third parties to manage their workers.

Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment. The information and documentation will set out their rights under national labour and employment law (which will include any applicable collective agreements), including their rights related to hours of work, wages, overtime, compensation and benefits, as well as those arising from the requirements of the ESS. This information and documentation will be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur.

For more details on the WB Environmental and Social Standards and the EHS guidelines, please follow the below links: www.worldbank.org/en/Projects-operations/environmental-and-socialframework/brief/environmentaland-social-standards;

<https://documents1.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf> and

<http://Projects-beta.vsemirnyjbank.org/ru/Projects-operations/environmental-and-socialframework/brief/environmental-and-social-standards>.

4.3 Respective National Laws and Policies

The ultimate beneficiaries of the IDEA- Project are people in the IDEA Participating countries, which initially consists of DRC, Malawi, Zambia and Angola but this is set to increase to more than 15 as more countries join the programme. These countries have their country specific national labour laws which, in addition to ESS2 and the ILO core conventions that participating countries have ratified, will guide the management of Labor in each country. The national labor laws, ESS2 and the ratified ILO core conventions on labor management, will apply to all project workers, including direct and contracted workers as well as consultants. Table 3 provides core conventions and ratification status.

Table 3: ILO core conventions ratification status

| Relevant ILO Convention | DRC | Malawi | Zambia | Angola |
|---|-----|--------|--------|--------|
| C87 – Freedom of Association (1948) | ✓ | ✓ | ✓ | ✓ |
| C98 – Collective Bargaining (1949) | ✓ | ✓ | ✓ | ✓ |
| C29 – Forced Labour (1930) | ✓ | ✓ | ✓ | ✓ |
| C105 – Forced Labour Abolition (1957) | x | ✓ | ✓ | ✓ |
| C138 – Minimum Age (1973) | ✓ | ✓ | ✓ | ✓ |
| C182 – Worst Forms of Child Labour (1999) | ✓ | ✓ | ✓ | ✓ |
| C100 – Equal Remuneration (1951) | ✓ | ✓ | ✓ | ✓ |
| C111 – Discrimination (1958) | ✓ | ✓ | ✓ | ✓ |

4.4 National labour laws Versus World Bank ESS

Table 4 provides a comparative analysis between relevant national laws and the World Bank ESS2 providing the gaps thereof.

Table 4: Comparative analysis of national laws and ESS2

| ESS2 Requirement | Zambia | Malawi | DRC | Angola | Gap Analysis |
|---|-----------|-----------|-----------|-----------|---|
| Written employment contracts | yes | yes | yes | yes | Largely aligned; enforcement gaps in informal sector |
| Wages, benefits, working hours | yes | yes | yes | yes | Mostly covered; informal sector may lack enforcement |
| Fair termination & vulnerable worker protection | partially | partially | partially | partially | National laws are weaker than ESS2; limited protections |
| Protection of vulnerable workers | partially | partially | partially | partially | ESS2 is stronger than national law |
| Child labour & forced labour prohibition | yes | yes | yes | yes | Enforcement weak in some areas (DRC, informal sector) |
| Freedom of association & collective bargaining | yes | yes | yes | yes | Practical limitations; ESS2 broader worker engagement |
| Occupational health & safety (OHS) | partially | yes | partially | yes | Limited coverage for contractors; weak enforcement; right to refuse unsafe work missing |
| Contractor, community, supply-chain worker protection | | | | | Not explicitly covered; ESS2 requires explicit inclusion |

4.5 Terms and conditions

Employment contracts of workers on this Project are governed by the following:

- (a) COMESA Employment Contracts
- (b) Respective Country's National Law.

5.0 RESPONSIBILITY FOR IMPLEMENTATION OF THE LMP

5.1 Overview

IDEA MPA PCU's Project Coordinator has the overall responsibility to oversee all aspects of the implementation of this LMP, to ensure project staff and consultant compliance. The PCU will address all LMP aspects as part of recruitment and procurement process as well as during induction. The consultant, subsequently, is responsible for management of contracted workers

in accordance with contract specific Labour Management Plans (which should be in line with ESS2, the national labour law and the ratified ILO core conventions), implementation of which will be supervised by the PCU monthly or at shorter intervals as defined by specific Plans. Table 5 provides the responsibility for implementation of LMP Aspects. The detailed approach is described in the following sections.

Table 5: Responsibility for Implementation of LMP Aspects

| No | Aspect | Responsibility |
|----|--------------------------------|--|
| 1. | Occupational Health and Safety | The PCU in cooperation with the COMESA Secretariat's Human Resources Unit shall act as the safety representative that ensures the day-to-day compliance with specified safety measures and records of any incidents. Where a minor incident(s) occurs, they will be reflected in the quarterly reports to the World Bank, major issues including SEA/SH and fatalities are flagged to the World Bank within 24 hours of occurrence. |
| 2. | Labour and Working Conditions | The PCU in cooperation with the COMESA Secretariat's Human Resources Unit will keep incident records in accordance with specifications set out in this LMP. The PCU will review the incident records against actuals at a minimum monthly and can require immediate remedial actions if warranted. A summary of issues and remedial actions will be included in quarterly reports to the World Bank. |
| 3. | Worker Grievances | GRM procedures will apply for Project staff. Consultants will be required to present a worker grievance redress mechanism which responds to the requirements in this LMP. The PCU Designated Officer will review records on a case-by-case basis. The PCU will keep abreast of resolutions and reflect in quarterly reports to the World Bank. |
| 4. | Training for Project Staff | The PCU is required to, always, have a qualified designated officer on board to identify and assess skills gaps. Where additional or refresher training is required, the COMESA Secretariat, through the PCU, will procure training services to address knowledge gaps and will provide a schedule for trainings required. Project staff will be obligated to make themselves available for this training, as well as any additional mandatory trainings required by the COMESA Secretariat, as specified by the contract. |
| 5. | Raising Awareness | Where the Project is required to organise awareness initiatives, the PCU will take initiative to organize sessions on raising awareness of the communities on issues relevant to the Project's activities. This, in addition to the |

| No | Aspect | Responsibility |
|----|--|---|
| | | Project's Communication Strategy, will ensure effective and efficient participation of different stakeholders in the Project. |
| 6 | Staff Health Insurance | The COMESA Secretariat, through IDEA project funds, will be responsible for facilitating medical insurance for the PCU staff while consultants will cater for their own insurance including that of their contracted workers. |
| 7 | Transportation and Settlement of PCU Staff | The COMESA Secretariat, through IDEA project funds, will meet the cost for transportation and settlement on initial recruitment and separation of the PCU staff according to COMESA Staff rules. |

5.2 Polices and Procedures

Recruitment and employment under this project will follow the Zambian Employment Act and COMESA guidelines, ensuring transparency, fairness, and non-discrimination. All positions will be publicly advertised with clear job descriptions, and applications considered only through official IDEA procedures. Workers will receive written contracts, explained where necessary, and unskilled labour will be preferentially recruited locally. Employment terms, including termination notices, will comply with the law, and no hiring fees will be charged to workers. All terms will be communicated in a language understood by both parties, with age verified for all workers. Contractors must implement a Code of Conduct aligned with project standards.

5.2.1 Discrimination and exclusion of vulnerable/disadvantaged groups

- (a) The PCU will maintain fair terms and conditions guided by ESS2 and GIIP for all Project Staff and consultants working on the IDEA Project;
- (b) Decisions relating to the employment or treatment of Project workers will be made in accordance with the requirements of the job. The recruitment of Project workers will be based on the principle of equal opportunities and fair treatment, and there will be no discrimination in recruitment and hiring, remuneration (including wages and benefits), working and employment conditions, access to training, assignment of a position, promotion, termination or retirement, or disciplinary practices;
- (c) Decisions relating to the employment or treatment of project workers will not be made on the basis of personal characteristics unrelated to inherent job requirements. The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices. Where national law is inconsistent with this paragraph, the project will seek to carry out project activities in a manner that is consistent with the requirements of this paragraph to the extent possible. Where there is an inconsistency between

COMESA regulations or applicable national laws and ESS2, the standard providing the greater protection to the worker will prevail; and

- (d) The contractor will be also required to comply with the national Labour law on gender equality in the workplace, which will include provision of maternity leave and sufficient and suitable toilet and washing facilities, separate from men and women workers.

5.2.2 Labor disputes over Terms and Conditions of Employment

- (a) To avoid labor disputes, fair terms and conditions will be applied for Project workers;
- (b) The Project will respect the workers' right to join labour unions and freedom of association, as set out in the COMESA rules and national laws; and
- (c) The Project will maintain a grievance mechanism for all Project workers to promptly address their workplace grievances, including in relation to workplace sexual harassment, in line with the provisions of ESS2.

5.2.3 Forced Labor

- (a) IDEA strictly prohibits forced and child labour. Contractors and service providers will ensure no worker is forced to work under any form of duress, coercion, or limitation of freedom. Contractors ensure workers' rights to terminate their employment freely within the legal framework. For the reference of consultants, this may also include excessive limitations of freedom of movement, imposition of recruitment or employment fees payable at the commencement of employment, loss or delay of wages that impede the workers' right to end employment within their legal rights, substantial or inappropriate fines, physical punishment, use of security or other personnel to force or extract work from Project workers, or other restrictions that compel a Project worker to work in a non-voluntary basis.

5.2.4 Occupational Health and Safety Compliance

IDEA is committed to:

- (i) Abide by national legislation, World Bank standards, and the World Bank Group Environmental, Health, and Safety (EHS) guidelines.
- (ii) Promote active participation in OSH risk mitigation through skills training and awareness.
- (iii) Strive to improve OSH management and performance continually.
- (iv) Regular communication ensures that all workers know OSH's responsibilities.
- (v) Make this OSH policy available to all parties at IDEA facilities and sites.

IDEA will ensure that all its contractors designate a Safety, Health, and Environmental Representative at each workplace. This representative is responsible for:

- (i) Identifying potential hazards.
- (ii) Investigating accidents in collaboration with the employer.
- (iii) Inspecting workplaces to ensure employee safety and health.
- (iv) Making safety and health recommendations to the employer or safety committee.
- (v) Accompanying inspectors during workplace inspections.

5.2.5 Sexual Exploitation Abuse and Harassment

- (a) Overall, Project Staff and all consultants are required to adhere to and implement measures contained in the Project SEA/SH mitigation and response action plan;

- (b) All consultants are required to ensure that their contracted workers sign a Code of Conduct (CoC) that sets out acceptable standards of behavior. The CoC shall include sanctions for non-compliance, including non-compliance with specific policies relating to SEA/SH. Consultants whose employees in CoC does not meet these standards will be required to adapt the Project CoC for employees to sign. The CoC shall be signed by each worker to indicate that they have:
 - (i) Received a copy of the CoC as part of their contract;
 - (ii) Had the CoC explained to them as part of induction process;
 - (iii) Acknowledged that adherence to this CoC is a mandatory condition of employment; and
 - (iv) Understood that violations of the CoC can result in serious consequences in line with the sanctions provided for under the GRM.
- (c) All consultants shall be further required to act against SEA/SH, through:
 - (i) Organization of mandatory training and awareness raising for their workforce about refraining from unacceptable conduct toward local community members, specifically women and children. Training may be repeated;
 - (ii) Informing workers about national laws and institutional policies that make sexual harassment and gender-based violence a punishable offence;
 - (iii) Adopting a policy to cooperate with law enforcement agencies in investigating complaints about gender-based violence; and
 - (iv) Maintaining a separate grievance mechanism to capture and refer SEA/SH related complaints/issues and report SEA/SH complaints to the World Bank through the PCU within 24 hours upon receipt.

5.2.6 Risk and Incident Reporting

Contractors are required to:

- (a) Report minor incidents to the PCU using the incident reporting form (Annex 3)
- (b) Report serious incidents or fatalities within 24 hours to IDEA and the World Bank.
- (c) Log all incidents and accidents, incorporating them into regular monitoring and evaluation.
- (d) Undertake incident or accident investigations as guided by the Incident Investigation form (Annex 4)

6.0 AGE OF EMPLOYMENT

No person under 18 years of age shall be employed or permitted to work on the Project, regardless of national labour laws, to ensure the highest standards of child protection. While Zambia allows light work between age 13–15 and prohibits hazardous work under 18, COMESA guidelines and the ILO Minimum Age Convention (C138) set 15 years as the minimum for general employment and 18 for hazardous work. In Angola, employment is generally permitted from age 14, with hazardous work restricted to those 18 and above, and in the DRC, children under 16 are prohibited from work, with hazardous work reserved for persons aged 18+.

The Project adopts 18 years as the minimum age for all work. The age of prospective workers will be verified before engagement. The National Identification Card (ID), Passport, birth certificates, or national driver's licenses will be used as proxy documents for verifying workers' age. In the absence of one of those forms of IDs, the Project will apply and document an age verification process. The age verification process will consist of alternative methods including

copies of academic certificates, testimony/affidavits from officials of the schools attended, a medical examination, statements from family members and locality/village officials/local authorities.

7.0 TERMS AND CONDITIONS

All workers engaged on the Project, including contractors and workers, will comply with the Zambian Employment Act, relevant national labour laws, and World Bank ESS2. COMESA staff rules and regulations shall only apply where they have been expressly provided for in the contract.

- (i) **Minimum Age:** Workers must be 18 years or older, verified using official documents or alternative methods if unavailable.
- (ii) **Fair Wages:** Wages must meet or exceed the government minimum and reflect skills and experience.
- (iii) **Non-Discrimination:** Employment conditions are applied equally to all workers, regardless of gender, race, religion, disability, or other status.
- (iv) **Timely Payment:** Wages are paid at least monthly, with records maintained for transparency.
- (v) **Written Contracts:** Workers receive signed contracts detailing roles, hours, wages, and benefits within one month of employment.
- (vi) **Code of Conduct:** All workers must sign and follow the Project Code of Conduct, covering gender equality, harassment prevention, and safe work practices.
- (vii) **Contractor Compliance:** Contractors provide the PCU of IDEA with workers' contracts, with monitoring and audits ensuring compliance.

8.0 WORKER GRIEVANCE MECHANISM

This section provides a summary of the grievance management procedures that internal and external stakeholders have follow to present their complaints and grievances.

IDEA has established a comprehensive GRM to ensure all project workers, including contractors, have a fair and accessible means to lodge complaints or concerns. This mechanism aims to address grievances efficiently, transparently, and at no cost to the complainant while ensuring timely and satisfactory resolutions. The GRM will be communicated to all workers during the recruitment process and throughout the project's lifecycle.

The GRM will handle all types of grievances, including but not limited to work-related issues, labour practices, health and safety concerns, and incidents of discrimination. Criminal matters, however, will be referred to the appropriate authorities. Examples of Grievances Include:

- (i) Unfair dismissal from work.
- (ii) Suspected corruption or theft.
- (iii) Unsafe working conditions.
- (iv) Non-compliance with environmental standards, such as poor waste management.
- (v) Payment of wages below the minimum set by national labour laws.
- (vi) Delayed or non-payment of wages.
- (vii) Excessive working hours or poor working conditions.
- (viii) Forced labour.
- (ix) Incidences of GBV, SH, and SEA.

- (x) Discrimination based on race, gender, ethnicity, or other factors.

8.1 Implementation of the GRM

IDEA will establish a Workers' Grievance Redress Committee (WGRC) at each contractor level to facilitate the implementation of the GRM. The following shall constitute WGRC membership with at least 40% representation of each gender:

The chairperson and secretary will be chosen from among the committee members, who shall serve in that capacity for the duration of project implementation.

8.2 GRM Process

The GRM process consists of five key stages to ensure transparency and fairness:

Stage 1: Complaint Uptake

Workers can submit their complaints directly to the WGRC in person, via phone, email, or through drop boxes provided at workplaces. IDEA will also accept anonymous grievances to encourage open communication. Complaints can also be directed to the Project Coordinator at the IDEA PCU office through the following contact details:

Project Coordinator

COMESA Secretariat

Address, Ben Bella Road

P.O. Box 30051, Lusaka,

Phone: +260211 229725/32

Email: dsabiti@comesa.int/idea@comesa.int

Mechanisms to Identify and Receive Grievances:

- (i) **Direct contact:** Via phone, letter, email, social media, or in person at the site office. Anonymous grievances are accepted.
- (ii) **WGRC Contact:** Workers present their complaints to the WGRC.
- (iii) **Suggestion Boxes:** Available at contractor camps, engineering offices, and local government offices around the project area.
- (iv) **Exit Interviews:** To gather feedback from employees about issues they may not have raised while employed.
- (v) **Information Table:** A regular information table at the work site where workers can ask questions or express concerns.

IDEA has established dedicated grievance uptake channels domiciled at COMESA as follows:

- (a) A dedicated GRM Phone Number (+260772909403/ +260773000254) with WhatsApp and Text facility.
- (b) A dedicated email address (grmidea@comesa.int).

Stage 2: GRM Registry

All grievances are logged in a secure and accessible registry system. The Workers' Grievance Log and Resolution Form, document cases heard, closed, or referred. This ensures transparency and allows for monitoring and evaluation of the process.

Stage 3: Investigation, Assessment, and Response

Once a complaint is received, the WGRC will assess its relevance to the project and provide a resolution within 15 working days. If a complaint is unrelated to the project, the worker will be advised to seek redress through the appropriate channels. The complainant will be informed of the status and expected resolution timeframe for complex cases requiring longer investigation.

Stage 4: Resolution and Closure

If a resolution is reached and accepted by the complainant, they will sign the resolution section of the Grievance Log and Resolution Form, along with two WGRC members (the Chairperson and Secretary). If the issue remains unresolved, the complainant may seek legal redress through civil courts.

Stage 5: GRM Monitoring and Evaluation

The GRM will be evaluated periodically to ensure its efficiency and effectiveness. Regular monitoring will track the number of complaints received, resolved, and outstanding, allowing for necessary adjustments to be made. This evaluation will help assess the impact of the GRM on workers' concerns and the overall project.

8.3 Grievance Management Timeframe

Clear and realistic timeframes are essential for building trust in the GRM. The grievance management process will adhere to the timelines provided in the Project GRM manual.

8.4 Additional Considerations

- (i) **Confidentiality:** The GRM ensures that all complaints are treated with privacy and susceptible issues like GBV, SH, and SEA.
- (ii) **Worker Sensitisation:** All workers will be sensitised on the use and purpose of the GRM during recruitment and throughout the project.
- (iii) **Non-Retaliation:** IDEA guarantees that workers can raise grievances without fear of retaliation or discrimination.

8.5 WB's Grievance Redress Service (GRS)

Communities and individuals who believe that they are adversely affected by a Project supported by the World Bank may submit complaints to existing Project-level grievance mechanisms or the Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed to address Project-related concerns. Project affected communities and individuals may submit their complaint to the Bank's independent Accountability Mechanism (AM). The AM houses the Inspection Panel, which determines whether harm occurred, or could occur, because of Bank non-compliance with its policies and

procedures, and the Dispute Resolution Service, which provides communities and borrowers with the opportunity to address complaints through dispute resolution. Complaints may be submitted to the AM at any time after concerns have been brought directly to the attention of Bank Management and Management has been given an opportunity to respond. For information on how to submit complaints to the Bank's Grievance Redress Service (GRS), visit <http://www.worldbank.org/GRS>. For information on how to submit complaints to the Bank's Accountability Mechanism, visit <https://accountability.worldbank.org>.

9.0 CONTRACTOR MANAGEMENT

Under the IDEA, contractors will carry out various construction activities, including expanding broadband connectivity options (fibre, fixed wireless) to unconnected public institutions. To ensure fair competition and transparency, contractors will be selected following the guidelines set by the IPF World Bank Regulations. This process will include:

- (i) *Competitive Bidding*: Conducted through transparent, open advertising to ensure a fair selection process.
- (ii) *Shortlisting and Selection*: Contractors will be shortlisted and selected based on their qualifications and compliance with project requirements.
- (iii) *Contractual Signing*: Formal agreements between the selected contractors and the implementing agency will be signed.

IDEA will incorporate labour and working condition requirements into all contractual agreements. Contractors must develop a comprehensive Code of Conduct for their workers to sign. These requirements will be explicitly included in the bid documents and the contract to ensure full compliance.

PCU will ensure that subcontracting by the primary contractor is done with the consent of the IDEA implementing agency, which will monitor and evaluate contractor activities regularly in line with the IDEA Monitoring and Evaluation Framework. The project will also enhance awareness among workers about their rights and entitlements.

Moreover, contractors will be expected to:

- (i) *Monitor, Record, and Report*: Keep detailed records and provide regular reports on labour management, including information on worker contracts, induction processes, working hours, remuneration, overtime, and compliance with collective bargaining agreements.
- (ii) *Safety Management*: Document recordable incidents, carry out root cause analyses, and report first aid cases, high potential near misses, and other occupational health and safety (OHS) issues. This will include revising job safety analyses, introducing new equipment or procedures, and conducting regular safety training.
- (iii) *Track Worker Details*: Maintain records of the workforce, including numbers, origin (local or expatriate), gender, age (ensuring no child labour), skill level (unskilled, skilled, supervisory, professional, management), and other relevant details.
- (iv) *Training*: Record dates, number of trainees, and training topics, ensuring ongoing capacity building.
- (v) *Security Risks*: Identify and assess potential risks associated with project activities, including risks from external third parties.
- (vi) *Worker Grievances*: Document and address worker grievances, including dates of occurrence, nature of grievances, actions taken, resolution status, and follow-up steps. Grievances will be recorded in regular reports to the implementing agency.

9.1 Code of Conduct

The Code of Conduct developed by contractors will aim to prevent and mitigate social risks related to project activities. This includes risks of GBV, SEA, (SH, child labour, forced labour, wage disputes, health risks (such as HIV/AIDS), and environmental issues. IDEA will require contractors to create a safe working environment, and this Code of Conduct will serve as a legally binding document that sets behavioural standards for all workers. Annex 1 provides a code of conduct for the contractor, and Annex 2 provides a code of conduct for every worker engaged by the contractor.

10.0 ANNEXES

Annex 1: Code of Conduct for Contractor

We are the Contractor, [enter name of Contractor]. We have signed a contract with [enter name of Employer] for [enter description of the Works]. These Works will be carried out at [enter the Site and other locations where the Works will be carried out]. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation, sexual abuse and sexual harassment.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, laborers and other employees at the Works Site or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as “Contractor’s Personnel” and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that we require from all Contractor’s Personnel. Our workplace is an environment where unsafe, offensive, abusive or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

REQUIRED CONDUCT

Contractor’s Personnel shall:

1. carry out his/her duties competently and diligently;
2. comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor’s Personnel and any other person;
3. maintain a safe working environment including by:
 - a. ensuring that workplaces, machinery, equipment and processes under each person’s control are safe and without risk to health;
 - b. wearing required personal protective equipment;
 - c. using appropriate measures relating to chemical, physical and biological substances and agents; and
 - d. following applicable emergency operating procedures.
4. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health;
5. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
6. not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other Contractor’s or Employer’s Personnel;

7. not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another;
8. not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;
9. not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
10. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, and Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH);
11. report violations of this Code of Conduct; and
12. not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of the grievance mechanism for Contractor's Personnel or the project's Grievance Redress Mechanism.

RAISING CONCERNS

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact [enter name of the Contractor's Social Expert with relevant experience in handling gender-based violence, or if such person is not required under the Contract, another individual designated by the Contractor to handle these matters] in writing at this address [] or by telephone at [] or in person at [];
or
2. Call [] to reach the Contractor's hotline (if any) and leave a message.

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

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

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by Contractor's Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

Annex 2: Code of Conduct for Contractor Personnel

I, _____, undertake to adhere to the IDEA MPA Project environmental, social, health and safety (ESHS) standards requirements, and preventing sexual exploitation and abuse and sexual harassment (SEA/SH), and violence against children (VAC).

I understand that failure to adhere to ESHS standards, or to commit acts of SEA/SH or VAC - be it on the work site, the work site surroundings, or the surrounding communities -constitute acts of gross misconduct and are therefore grounds for sanctions, penalties, or potential termination of employment and prosecution.

I commit that while working on the Project, I shall:

Regarding Occupational Health and Safety

Comply with legislation and other applicable requirements relating to occupational health and safety risks;

Attend occupational health and safety trainings as requested by employer or the Project;

Identify the potential risks associated with each activity and workstation;

Make recommendations regarding safety and health issues affecting employees;

Wear prescribed and appropriate personal protective equipment (PPE) all times on Project site;

Prevent avoidable accidents and report conditions or practices that pose a safety hazard or threaten the environment; and

Report any violations of this code of conduct to the workers' representative, HR, or grievance redress committee. No employee who reports a violation of this code of conduct in good faith shall be punished in any way.

Regarding Sexual Exploitation and Abuse and Sexual Harassment

Attend and actively partake in training courses related to SEA/SH and VAC as requested by the Project;

Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other affiliation, nationality, ethnicity, or social origin, property, disability, birth or nationality, sexual orientation, gender identity, or other status;

Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;

Not engage in sexual exploitation, which is defined as any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another;

Not engage in sexual abuse, which is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;

Not engage in sexual harassment, which is defined as any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause

offense or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment;

Not participate in sexual contact or activity with children (including grooming or contact through digital media, community members married to minors will not be hired, mistaken belief regarding the age of a child or consent from the child);

Not having sexual interactions with members of the host communities (NB: an exception applies to a locally hired worker already married to an adult member of the community). This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code; and

Consider reporting through the Grievance Mechanism or to my immediate supervisor against any suspected or actual SEA/SH or VAC by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

Regarding children under the age of 18

Wherever possible, ensure that another adult is present when working in the proximity of children;

Not invite unaccompanied children unrelated to my family into my home unless they are at immediate risk of injury or in physical danger;

Not use any computers, mobile phones, video, and digital cameras or any other medium to exploit or harass children or to access child pornography (see also “Use of children's images for work related purposes” below);

Refrain from physical punishment of children;

Refrain from hiring children below the minimum age of 15, for domestic or other labor which places them at significant risk of injury, as specified by the national law;

Comply with all relevant local legislation, including labor laws in relation to child labor and World Bank's E&S standards on child labor and minimum age; and

Take appropriate caution when photographing or filming children (see details below).

Use of children's images for work-related purposes. When photographing or filming a child for work related purposes, I shall:

Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images;

Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I shall explain how the photograph or film will be used;

Ensure photographs, films, and videos present children in a dignified and respectful manner and not in a vulnerable or submissive manner and that the children are adequately clothed and not in poses that could be seen as sexually suggestive;

Ensure images are honest representations of the context and the facts; and

Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

I understand that if I breach this Code of Conduct, IDEA MPA shall take disciplinary action which may include:

Issuance of an informal warning;

Issuance of a formal warning;

Loss of up to one week's salary;

Suspension of employment (without payment of salary/contract fees), for a minimum period of 1 month up to a maximum of 6 months;

Termination of employment; or

Reporting to the police if warranted.

I understand that it is my responsibility to ensure that the environmental, social, health, and safety standards are met. I shall adhere to the occupational health and safety management requirements and avoid actions or behaviors that could be construed as SEA/SH or VAC. Any such actions shall be a breach of this Code of Conduct. I do hereby acknowledge that I have read the foregoing Code of Conduct and undertake to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to OHS, SEA/SH and VAC issues. I understand that any action inconsistent with or failure to act in accordance with this Code of Conduct may result in disciplinary action and may adversely affect my employment.

Signature: _____

Title: _____

Date: _____

Annex 3: Incident Reporting Form

| | | | |
|-------------|--|------------|--|
| Project | | | |
| Report date | | | |
| Reported by | | Title/role | |

I. DETAILS OF THE INCIDENT

| | |
|----------------|--|
| Incident date | |
| Incident time | |
| Incident place | |

II. IDENTIFICATION OF TYPE OF INCIDENT AND IMMEDIATE CAUSES

1) Select the type of the incident from the list below. An incident can be classified at the same time as H&S/environmental/social.

| Type of Incident - H&S | | Type of Incident - Social |
|---|------------------------|---|
| Moving Machinery/vehicles at project site | Dust, Fumes, Vapours | Misuse of property |
| Fall from height | Noise | Damage to Cultural Heritage |
| Powered Hand tools | Temperature or heat | Occurrence of infringement of labour rights |
| Hand Tools | Overexertion | Occurrence of infringement of human rights |
| Animals or insects | Structural Failure | Stakeholder/community complaint |
| Fire or Explosion at project site | Chemical/biological | Strike, demonstration |
| Trips & smaller falls | Stress | Other (please specify) |
| Drowning | Other (please specify) | |
| Borrow-pit Management | | |

| Type of Incident - Environmental | |
|-------------------------------------|---|
| Chemical/Oil Spill | Damage to ecosystems (e.g. damage to flora/fauna) |
| Improper Disposal Waste | Odour air Emissions |
| Disasters (Earthquake, Flood, etc.) | Dust, Fumes, Vapours, Air pollution |
| Water Pollution/ Sedimentation | Other (please specify) |

Annex 4: Incident Investigation Form

OHS Incident Investigation Form

Classification of Accident (Indicative, Serious, Severe)
.....

Description of the accident:
.....
.....
.....
.....

Date and Time of Accident:

Location of the accident:

Source of accident alert:

Investigation

Date and Time of Investigation:

Names and Status of Investigating Team

Name: Position: Sign:

Name: Position: Sign:

Name: Position: Sign:

Complete accident investigation questionnaire and attach copies to Incident Investigation Form.

Findings of Investigation Team

Team's description of events leading up to the accident

Team's Description of the accident itself

Team's view on the causes of the accident

Recommendation to reduce potential accident (immediate fix)

Date.....No.....Section.....

Root causes:

Preventive Action taken:

Further Recommendation - Preventive actions:

Project Manager: Comments and Actions to be taken or recommended to higher authority:

Signature: Date: