

**REPUBLIC OF GHANA**

**MINISTRY OF ROADS AND HIGHWAYS / DEPARTMENT OF  
FEEDER ROADS**



**GHANA MARKET ACCESS AND CONNECTIVITY PROJECT**

**P513708**

**LABOUR MANAGEMENT PROCEDURES  
(LMP)**

**AUGUST 2026**

## ABBREVIATIONS AND ACRONYMS

|        |                                                                     |
|--------|---------------------------------------------------------------------|
| ADR    | Alternative Dispute Resolution                                      |
| AIT    | Agency Implementation Team                                          |
| CBA    | Collective Bargaining Agreement                                     |
| CBMWU  | Construction and Building Materials Workers Union                   |
| C-ESMP | Contractor Environmental and Social Management Plan                 |
| CHRAJ  | Commission on Human Rights and Administrative Justice               |
| CRC    | Convention on the Rights of the Child                               |
| DDSWCD | District Departments of Social Welfare and Community Development    |
| DFR    | Department of Feeder Roads                                          |
| EHS    | Environmental, Health and Safety Guidelines                         |
| ESF    | Environmental and Social Framework                                  |
| ESHS   | Environmental, Social, Health, and Safety                           |
| ESMP   | Environmental and Social Management Plan                            |
| ESS    | Environmental and Social Standard                                   |
| ESS2   | Environmental and Social Standard 2 (Labour and Working Conditions) |
| FWSC   | Fair Wages and Salaries Commission                                  |
| GBV    | Gender-Based Violence                                               |
| GM     | Grievance Mechanism                                                 |
| GRM    | Grievance and Redress Mechanism                                     |
| HR     | Human Resources                                                     |
| LMP    | Labor Management Procedure/Plan                                     |
| MMDAs  | Metropolitan Municipal and District Assemblies                      |
| MLGDRD | Ministry of Local Government Decentralization and Rural Development |
| MoLJE  | Ministry of Labour Jobs and Employment                              |
| MRH    | Ministry of Roads and Highways                                      |
| NEP    | National Employment Policy                                          |
| NLC    | National Labour Commission                                          |
| NPRA   | National Pension Regulatory Authority                               |
| OHLGS  | Office of the Head of Local Government Service                      |
| OHS    | Occupational Health and Safety                                      |
| PCU    | Project Coordination Unit                                           |
| PDO    | Project Development Objective                                       |
| PWDs   | Persons with Disabilities                                           |
| SEA/SH | Sexual Exploitation and Abuse and Sexual Harassment                 |
| SOP    | Standard Operating Procedure                                        |
| TCU    | Trades Union Congress                                               |
| UN CRC | United Nations Convention on the Rights of Children                 |
| UNICEF | United Nations Children's Fund                                      |
| WHO    | World Health Organization                                           |

## GLOSSARY

**Alternative Dispute Resolution (ADR):** A legal framework facilitating the resolution of conflicts outside formal court systems, involving methods such as mediation and arbitration, to achieve faster, non-adversarial outcomes.

**Community Workers:** People employed or engaged in providing community labour in connection with the project. This category is particularly relevant where project activities deliberately mobilize members of local communities to provide labour, often through community-based arrangements rather than conventional employment relationships.

**Contracted Workers:** People employed or engaged through third parties to perform work related to the core functions of the project, where the third party exercises control over the worker's work, working conditions and treatment. The third party may be a contractor, subcontractor, labour broker, agent or intermediary.

**Direct Workers:** People employed or engaged directly by the Borrower to work specifically in relation to the project. A direct worker has a direct employment/engagement relationship with the Borrower, is generally paid directly by the Borrower, and is subject to the Borrower's day-to-day instruction and control.

**Environmental and Social Framework (ESF):** A World Bank framework that outlines standards and procedures for assessing and managing the environmental and social risks in funded projects.

**Environmental and Social Management Plan (ESMP):** A comprehensive plan detailing the mitigation measures, monitoring activities, and management practices to address environmental and social impacts throughout a project's lifecycle.

**Environmental and Social Standard 2 (ESS2):** Part of the ESF, this standard focuses specifically on labour and working conditions, setting guidelines for fair treatment, safe working environments, and protection of workers' rights.

**Fair Wages and Salaries Commission (FWSC):** A commission in Ghana responsible for ensuring fair, transparent wage structures in the public sector, addressing wage disparities and ensuring equitable compensation.

**Gender-Based Violence (GBV):** Any harmful act directed at an individual based on their gender, including but not limited to physical, sexual, or psychological harm.

**Grievance Mechanism (GM):** A structured system for managing complaints and grievances raised by workers, enabling them to seek redress safely and confidentially.

**Grievance Redress Mechanism (GRM):** The structured system for managing complaints and grievances raised by anybody or broader project-level stakeholders (including project affected persons and communities) related to the project's impact, functioning, a contractor, sub-contractor, and third party, enabling them to seek redress safely and confidentially.

**International Labour Organisation Convention No. 138 (ILO C138):** An international treaty setting the minimum age for employment, aiming to prevent child labour and protect children's rights globally.

**International Labour Organisation Convention No. 182 (ILO C182):** A treaty adopted to eliminate the worst forms of child labour, including slavery, trafficking, and hazardous work, which poses a risk to the health and well-being of minors.

**Labour Management Procedures (LMP):** A framework detailing the policies, procedures, and requirements for managing project workers, including health, safety, and grievance mechanisms, in alignment with ESS2 and national laws.

**Labour-Intensive Public Works (LIPW):** A policy encouraging manual labour over machinery in public works, providing employment opportunities for unskilled and semi-skilled workers, often aimed at reducing poverty.

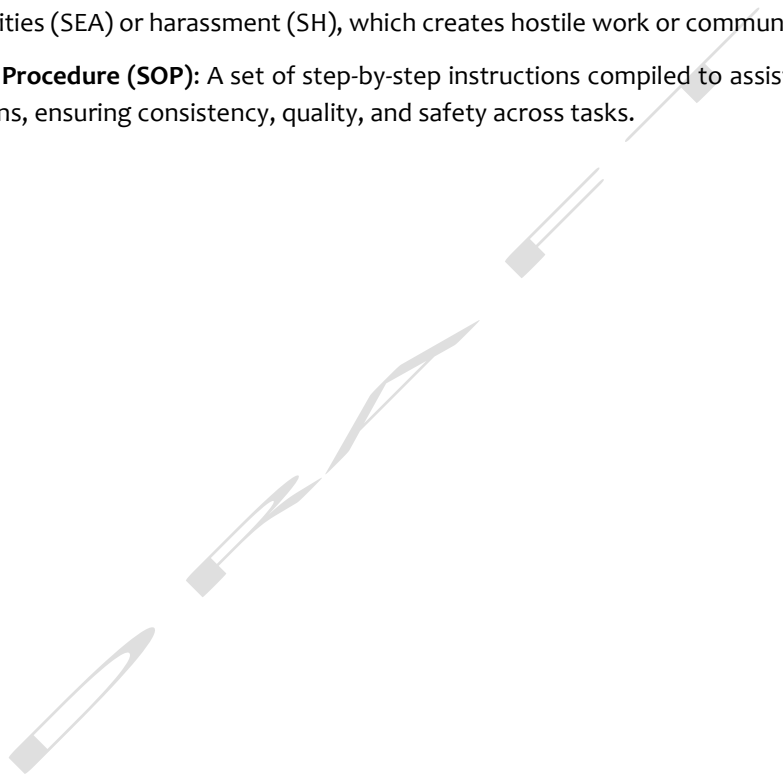
**Occupational Health and Safety (OHS):** Measures and protocols to ensure safe working conditions and prevent workplace-related injuries and illnesses.

**Persons with Disabilities (PWDs):** Individuals who have long-term physical, mental, intellectual, or sensory impairments that, when interacting with barriers, may limit their full and effective participation in society.

**Project Implementation Unit (PIU):** The team responsible for managing, coordinating, and implementing project activities and compliance with project standards.

**Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH):** Unwanted conduct of a sexual nature, including coercive sexual activities (SEA) or harassment (SH), which creates hostile work or community environments.

**Standard Operating Procedure (SOP):** A set of step-by-step instructions compiled to assist workers in carrying out routine operations, ensuring consistency, quality, and safety across tasks.



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## EXECUTIVE SUMMARY

### Project Overview

The Government of Ghana, through the Department of Feeder Roads (DFR) under the Ministry of Roads and Highways (MRH), has prepared this Labour Management Procedures (LMP) for the proposed **Ghana Market Access and Connectivity Project (GMACP) (Project ID: P513708)**. The project is supported by the World Bank under its Environmental and Social Framework (ESF, 2018).

The project is financed through an International Development Association (IDA) credit of **US\$500 million**, with an additional **US\$25 million** from the Government of Ghana, bringing the total project cost to **US\$525 million**.

The Project Development Objective is to:

- Enhance sustainable farm-to-market road connectivity in selected areas of Ghana; and
- Strengthen road asset management systems.

In practical terms, the project will rehabilitate feeder roads that connect rural farming communities to markets, schools, and health facilities, while also improving Ghana's long-term capacity to plan, fund, and maintain its road network.

The project is expected to directly benefit approximately **6.2 million people**, including **3.11 million women** and **3.09 million men (of which 3.42 million are youth)**, and supports national initiatives such as the Feed Ghana Programme (2025–2028) and the Agriculture for Economic Transformation Agenda (AETA).

### Project Components

The GMACP consists of four components:

#### Component 1: Rehabilitation of Feeder Roads

This component will finance the rehabilitation of approximately **1,050 km of feeder roads** to improve all-weather access from farm-gates to markets across four priority regional clusters.

**Cluster 1** (300km) is anchored in some districts in the Upper West, Northern, and Savannah regions such as Sissala West, where high maize and rice production (93rd percentile nationally) contrasts with poor connectivity, with about one-third of feeder roads in poor condition.

**Cluster 2** (300km), located around Lake Volta in the Oti, Volta, and Eastern regions, combines strong agricultural potential with significant connectivity gaps. For example, Biakoye District ranks in the 91st percentile for strategic crop production, yet about two-thirds of its feeder road network is in poor condition.

**Cluster 3** (250km) encompasses districts in the Ashanti, Bono, Bono East and Eastern regions, such as Kintampo North and Nkoranza North, which remain consistently prioritized across alternative weighting scenarios, alongside Wenchi and Kintampo South. The cluster extends eastward toward Lake Volta to include Kwahu Afram Plains North and South, a major food-producing area.

**Cluster 4** (200km), sitting across the regions of Ahafo, Central, Western, and Western North, is characterized by a high concentration of feeder roads in poor condition. Districts such as Bia East (about 70 percent of roads in poor condition) and Suaman (about 85 percent) rank among the most constrained nationally. The cluster also includes key commercial nodes, including Bibiani, Kotokuraba (Cape Coast), and Mankessim, which serve as important market hubs.

Road selection will follow a transparent, data-driven prioritization process based on agricultural productivity, food security, population, and road condition.

Key activities include: Road grading and surfacing; Drainage improvements; Construction of bridges and culverts; Roadside walkways; Installation of fiber optic infrastructure; and Integration of climate-resilient design features.

### **Component 2: Road Maintenance and Support to the Road Maintenance Trust Fund Reform**

This component focuses on ensuring long-term sustainability through: Reforms to the Road Maintenance Trust Fund; Expansion of the WIGRAMS digital road asset management system; and Performance-based maintenance contracts.

### **Component 3: Project Management and Implementation Support**

This component supports: Project coordination and implementation; Environmental and social risk management; Monitoring and evaluation (M&E); Citizen engagement and grievance management; Prevention of gender-based violence (GBV) and SEA/SH; and Capacity building for key institutions, including the Environmental Protection Authority (EPA), Department of Factories Inspectorate, and Lands Valuation Division.

### **Component 4: Contingent Emergency Response Component**

A CERC is included in the project in accordance with Investment Project Financing (IPF) Policy, paragraphs 12 and 13, for Situations of Urgent Need of Assistance and Capacity Constraints. This will allow for rapid reallocation of loan uncommitted funds in the event of an eligible emergency. To meet CERC activation requirements, the Government of Ghana will prepare a CERC Manual, submit an Emergency Action Plan (EAP), and meet the E&S requirements agreed in the EAP and ESCP.

This LMP aims to anticipate and mitigate labor-related risks for the GMAC Project in compliance with the World Bank Environmental and Social Standard 2 (ESS2). The LMP is a living document and will be updated throughout project implementation to address emerging issues. The LMP applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers.

### **Overview of labor use on the project**

During the lifespan of the project, it is anticipated that the project will engage the following types of workers.

- Direct workers: These are workers with a direct contractual relationship with the GMAC Project Agency Implementation Team (AIT)/Project Coordination Unit (PCU).
- Contracted workers: These are workers with a direct contractual relationship with a contractor/subcontractor/supplier.

- Community workers: People employed or engaged in providing community labor.

It is estimated that the project will engage in total 67 direct workers, 10,550 contracted workers and 1,450 community workers. This workforce will be engaged as follows during the lifespan of the project:

It is estimated that the project will need a workforce in the beneficiary selected regional clusters across Ghana, covering districts within four identified clusters targeting high agricultural production areas and at the Agency Implementation Team secretariat located within the Ministry of Roads and Highways (MRH) and Department of Feeder Roads (DFR) in Accra.

It is expected that the project *will not* employ migrant workers during the entire project life cycle. Young workers above minimum age for work but below 18 years *may* be involved in the workforce during the entire project life cycle.

### **Assessment of key potential labor risks:**

It is anticipated that the project will have some risks related to labor influx, SEA/SH, child and forced labor, social exclusion of vulnerable groups, non-discrimination, equal opportunity, and significant occupational health and safety risks to workers during different project phases and project activities. These anticipated risks will be appropriately mitigated as described in this Labor Management Procedure.

### **Overview of labor legislation: Terms and Conditions**

All work undertaken under GMAC Project shall comply with the World Bank's ESF and the ESS2 on Labour and Working Conditions, international standards to which Ghana adheres, as well as Ghana's legislation and regulations regulating labor and working conditions.

### **Responsible staff:**

The Department of Feeder Roads (DFR) Agency Implementation Team (AIT) is primarily responsible for implementation and reporting on this LMP. For the purpose of the GMAC Project, the DFR AIT will engage a *Social Safeguards Officer*, a *Gender-Based Violence, Sexual Exploitation and Abuse, and Sexual Harassment Officer*, and an *Environmental Officer* to manage the day-to-day implementation of this LMP (among other project activities).

### **Policies and procedures**

The project, any contractor and third parties (subcontractors, brokers, agents and intermediaries) when accepting a contract to work on the project shall sign a Code of Conduct and will thereby commit to following policies and accompanying procedures related to non-discrimination and equal opportunity; Occupational Health and Safety (OHS); freedom of association; prevention of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH); prevention of child labor; prevention of forced labor and transparent and fair hiring of workers and worker documentation.

### **Age of employment**

In accordance with ESS2, domestic and international laws, individuals under the age of 18 years are authorized to work in connection with the project on the condition that the work is not hazardous and that minimum age requirements, and special labor conditions are respected for these workers. The minimum age for authorized light work is 14 years, authorized full-time employment is at least 15 years or after finishing compulsory education, and 18 years is the minimum age for hazardous work. Conditions of young workers will be monitored with extra care to prevent exploitative and hazardous child labor.

### **Terms and conditions**

Workers shall be engaged with a written contract that specifies terms and conditions of the work, hours of work, compensation, leave, and that take into account the special conditions that apply for vulnerable workers, such as pregnant women or women with small children, and young workers. These terms and conditions apply to all direct workers and contracted workers. Third parties are required to sign written employment contracts for all workers upon hiring and inform them of all employment related obligations. Contractors and workers will sign a Code of Conduct that ensures that they are aware of their rights and duties to the project.

### **Grievance Mechanism**

Workers on the project will have access to a grievance mechanism where they can report any workplace issue of concern. The grievance mechanism for workers shall be separate from the main project grievance mechanism and shall operate based on the principles of accessibility; confidentiality and cultural sensitivity; fairness, impartiality and protection from retaliation; accountability; adaptation based on severity of the complaint; right to appeal and escalate cases and continuous improvement.

The grievance mechanism for workers will be a multi-tier system with a lower tier workplace grievance entry point / office and a higher tier for more complex or sensitive cases. The Worker GM (WGM) shall give special considerations and have referral procedures for severe cases related to legal & ethical violations such as sexual harassment, exploitation, or abuse, workplace discrimination, forced labor, human trafficking, or exploitative working conditions, child labor involvement or violations, serious safety risks that have led to injuries or fatalities, retaliation against whistleblowers. For such cases, the project will establish collaboration protocols with relevant statutory and professional services for such cases to get tailored support and remediation

### **Contractor management**

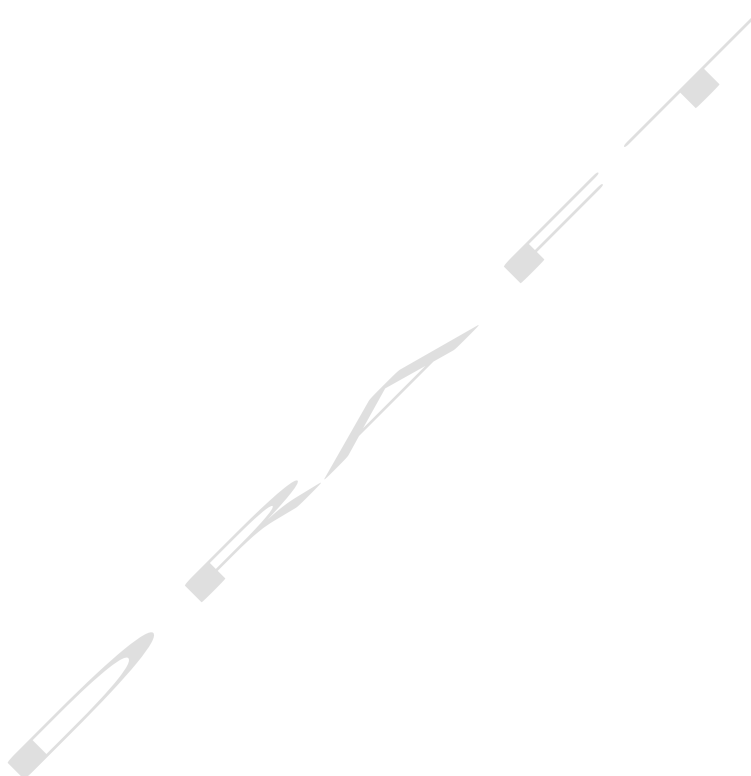
*GMAC Project* is overall responsible to ensure that contractors and third parties who mobilize and engage workers as labor force on the project are legally constituted and reliable entities and they are aware of and adhere to the policies, procedures and code of conduct established by this Labor Management Procedures. The performance of contractors and third parties will be monitored through announced or unannounced inspections.

### **Community workers**

Community workers do not need to be engaged in the project in writing, through an employment contract, but it will be ascertained that they offer their services voluntarily, are appropriately trained, are offered relevant tools and safety equipment, and are given clear communication of the terms and conditions prior to starting the work. Community workers will have access to a grievance mechanism, and the project responsible staff will conduct regular monitoring of community work to verify that community work fulfills requirements as per ESS2.

### **Primary supply workers**

Primary supply workers, employed by contractors to the project, respond and report to the contractors with whom they have a contract. The project will hire contractors with a good reputation and will monitor that they uphold the law and requirements of ESS2. Primary supply workers will have access to the grievance mechanism.



## 1. BACKGROUND

This Labor Management Procedure (LMP) is developed for the Ghana Market Access and Connectivity (GMAC) Project. The GMAC Project is a flagship initiative of the Ministry of Roads and Highways and implemented by the Department of Feeder Roads. The Project Development Objective (PDO) is to (i) enhance sustainable farm-to-market road connectivity in selected areas of Ghana and (ii) improve Road Asset Management systems. This PDO will be achieved through the implementation of the following components and activities:

- **Component 1: Rehabilitation of Feeder Roads**

This component will finance the rehabilitation of approximately **1,050 km of feeder roads** to improve all-weather access from farm-gates to markets across four priority regional clusters.

**Cluster 1** (300km) is anchored in some districts in the Upper West, Northern, and Savannah regions such as Sissala West, where high maize and rice production (93rd percentile nationally) contrasts with poor connectivity, with about one-third of feeder roads in poor condition.

**Cluster 2** (300km), located around Lake Volta in the Oti, Volta, and Eastern regions, combines strong agricultural potential with significant connectivity gaps. For example, Biakoye District ranks in the 91st percentile for strategic crop production, yet about two-thirds of its feeder road network is in poor condition.

**Cluster 3** (250km) encompasses districts in the Ashanti, Bono, Bono East and Eastern regions, such as Kintampo North and Nkoranza North, which remain consistently prioritized across alternative weighting scenarios, alongside Wenchi and Kintampo South. The cluster extends eastward toward Lake Volta to include Kwahu Afram Plains North and South, a major food-producing area.

**Cluster 4** (200km), sitting across the regions of Ahafo, Central, Western, and Western North, is characterized by a high concentration of feeder roads in poor condition. Districts such as Bia East (about 70 percent of roads in poor condition) and Suaman (about 85 percent) rank among the most constrained nationally. The cluster also includes key commercial nodes, including Bibiani, Kotokuraba (Cape Coast), and Mankessim, which serve as important market hubs.

Road selection will follow a transparent, data-driven prioritization process based on agricultural productivity, food security, population, and road condition. Key activities include: Road grading and surfacing; Drainage improvements; Construction of bridges and culverts; Roadside walkways; Installation of fiber optic infrastructure; and Integration of climate-resilient design features.

- **Component 2: Road Maintenance and Support to the Road Maintenance Trust Fund Reform**

This component focuses on ensuring long-term sustainability through: Reforms to the Road Maintenance Trust Fund; Expansion of the WIGRAMS digital road asset management system; and Performance-based maintenance contracts.

- **Component 3: Project Management and Implementation Support**

This component supports: Project coordination and implementation; Environmental and social risk management; Monitoring and evaluation (M&E); Citizen engagement and grievance management; Prevention of gender-based violence (GBV) and SEA/SH; and Capacity building for key institutions, including the Environmental Protection Authority (EPA), Department of Factories Inspectorate, and Lands Valuation Division.

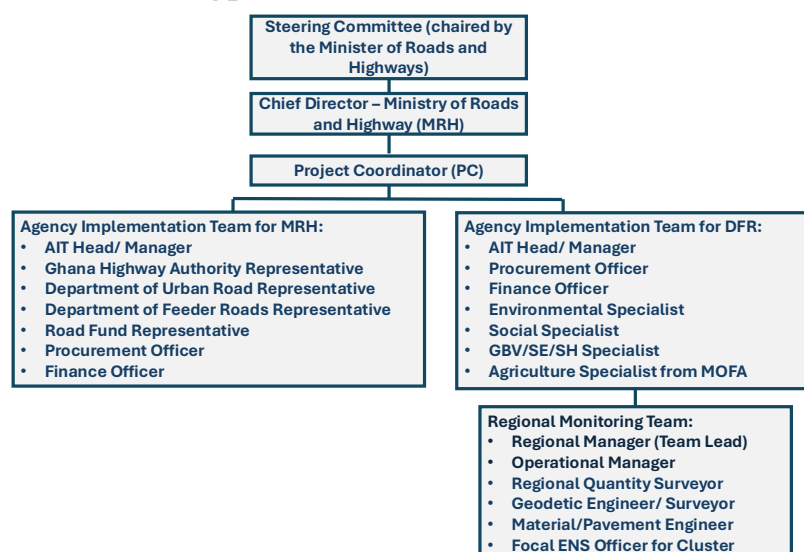
• **Component 4: Contingent Emergency Response Component**

A CERC is included in the project in accordance with Investment Project Financing (IPF) Policy, paragraphs 12 and 13, for Situations of Urgent Need of Assistance and Capacity Constraints. This will allow for rapid reallocation of loan uncommitted funds in the event of an eligible emergency. To meet CERC activation requirements, the Government of Ghana will prepare a CERC Manual, submit an Emergency Action Plan (EAP), and meet the E&S requirements agreed in the EAP and ESCP.

The development and implementation of an LMP is requirement of Environmental and Social Standard 2 (ESS 2) "Employment and Working Conditions" of the World Bank's Environmental and Social Framework (ESF). It aims to:

- Promote occupational health and safety.
- Encourage fair treatment, non-discrimination, and equal opportunity for project workers.
- Protect project workers, particularly vulnerable workers such as women, people with disabilities, children (of working age, as defined in this ESS), and migrant workers, as well as contract workers, community workers, and employees of major suppliers, where applicable.
- Prevent the use of all forms of forced labor and prohibited child labor.
- Support the principles of freedom of association and collective bargaining for project workers in accordance with national law.
- Provide project workers with the means to raise workplace issues.

The following figure presents the main characteristics of project management plans:

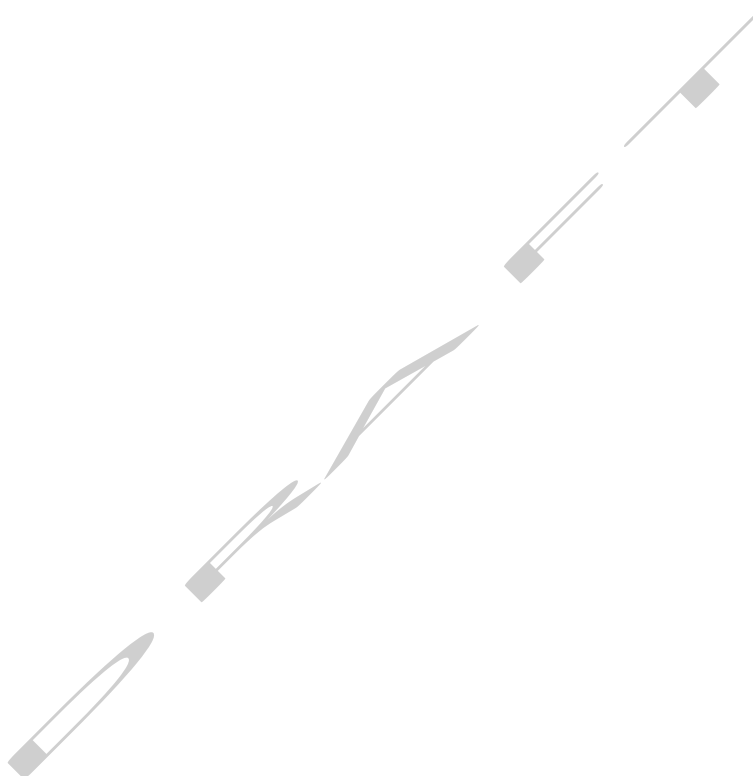


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**Figure 1.2: GMACP Institutional Arrangement**

This LMP aims to anticipate and mitigate labor-related risks for the GMAC Project. It has been developed in compliance with the World Bank's Environmental and Social Framework (ESF), principally ESS2 (Labor and Working Conditions), and is informed by ESS1 (Assessment and Management of Environmental and Social Risks and Impacts), ESS4 (Community Health and Safety), and ESS10 (Stakeholder Engagement and Information Disclosure), as well as applicable national labor legislation and World Bank Group Environmental, Health and Safety (EHS) Guidelines. The LMP is developed in the early stages of project preparation and will be updated throughout project implementation to reflect evolving project conditions and risks.

This LMP applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers.



## 2. OVERVIEW OF LABOR USE ON THE PROJECT

### 2.1 Project workforce need by project phase

During the lifespan of the project, it is anticipated that the project will engage the following types of workers:

- **Direct workers:** These are workers with a direct contractual relationship with GMAC Project Agency Implementation Team (AIT)/ Regional Monitoring Teams/Project Coordination Unit (PCU). Workers employed or engaged directly by the government to work specifically on the project. E.g., civil servants or consultants.
- **Contracted workers:** These are workers with a direct contractual relationship with a supplier. Workers employed by a third party to perform work or provide services related to the core functions of the project. (e.g., civil works contractors and subcontractors)
- **Community workers:** People employed or engaged in providing community labor<sup>1</sup>. If need be, this type of labour will be provided on a voluntary basis or on payment, if applicable, following an individual or community agreement with the Project.

It is estimated that the project will engage in total 67 direct workers, 10,550 contracted workers and 1,450 community workers. This workforce will be engaged as follows during the lifespan of the project:

**Table 1 – Worker categories by project phases**

| Project phase                                                          | Type of worker     | Estimated no. of workers | Justification                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------------------------------------------|--------------------|--------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Year 1 (2026 – 2027)</b><br>Mobilization, Readiness & Preparation   | Direct workers     | 67                       | Designs, surveys, procurement, limited civil works; workforce consists mainly of core PCU/AIT staff, safeguards teams, design engineers, procurement teams, surveyors, and small preparatory site teams. Minimal local labour for clearing or support activities. Minimal maintenance (start-up for Package 1)                                                               |
|                                                                        | Contracted workers | 680                      |                                                                                                                                                                                                                                                                                                                                                                              |
|                                                                        | Community workers  | 100                      |                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Year 2 (2027 – 2028)</b><br>Full-Scale Implementation & Supervision | Direct workers     | 67                       | Workforce demand ramp up. Full-scale construction begins across all packages in batches. Workers include construction workers, supervisors, equipment operators, surveyors, maintenance workers, IT and WIGRAMS specialists. Quarry workers, gravel and laterite suppliers, bitumen suppliers, equipment and materials supply chains. Community labour engaged only for non- |
|                                                                        | Contracted workers | 2420                     |                                                                                                                                                                                                                                                                                                                                                                              |
|                                                                        | Community workers  | 200                      |                                                                                                                                                                                                                                                                                                                                                                              |

<sup>1</sup> Projects may include the use of community workers in a number of different circumstances, including where labor is provided by the community as a contribution to the project, or where projects are designed and conducted for the purpose of fostering community-driven development, providing a social safety net or providing targeted assistance in fragile and conflict-affected situations.

|                                                                           |                    |      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------------------------------------------|--------------------|------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                           |                    |      | technical support tasks (e.g., non-technical labour for vegetation clearing, drain and culvert cleaning, removal of minor road debris, road-reserve maintenance, manual handling of non-hazardous materials, and other low-risk support activities).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Year 3 (2028 – 2029)</b><br>Full-Scale Implementation & Supervision    | Direct workers     | 67   | Peak construction (~500 km). Maintenance on Clusters 1–2. Workforce demand peaks. Full-scale construction continue across all packages.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                                                                           | Contracted workers | 3170 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                                           | Community workers  | 350  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Year 4 (2029 – 2030)</b><br>Full-Scale Implementation & Supervision    | Direct workers     | 67   | Declining construction (~450 km). Maintenance on Packages 1–3. Workforce demand declines slightly from peak levels. Full-scale construction continue across all packages.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                           | Contracted workers | 2780 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                                           | Community workers  | 400  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Year 5 (2030 – 2031)</b><br>Consolidation, Evaluation & Sustainability | Direct workers     | 67   | Workforce reduces to finishing crews, defect correction teams, specialists for testing and commissioning, and close-out inspections. Direct workers continue oversight for audits, handover, and M&E.<br><br>Community workers may be engaged, where appropriate and on a voluntary basis, to support the consolidation and sustainability of project investments. Their role will focus on low-risk, non-technical community-based activities, including routine cleaning of road reserves and drainage structures, removal of minor debris and vegetation, community-based observation and reporting of road defects and drainage problems, reporting of flooding, erosion and other emerging hazards, protection of road assets, participation in road-safety and asset-protection awareness activities, and provision of community feedback during post-project monitoring and evaluation. |
|                                                                           | Contracted workers | 1500 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                                           | Community workers  | 400  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

## 2.2 Workforce need by location

It is estimated that the project will need the following workforce, for the following types of jobs and with the following skills by project location:

**Table 2 – Timing of labor requirements by location, types of jobs and skills needed**

| Project location                                 | Number and type of worker | Type of job                                                                                                                                                                          | Skills required                                                                                                                                                                                                                                                                  | Timing of labor need  |
|--------------------------------------------------|---------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| Location 1: PCU/AITs at MRH and DFR Head Offices | 25 Direct workers         | Administration, finance, procurement, technical, safeguards, engineering, monitoring, contract management                                                                            | Administrative, finance, procurement, technical specialists, engineers, environmental, social and GBV/SEA/SH specialists, Occupational health and safety specialists                                                                                                             | Year 1 Through Year 5 |
|                                                  | 0 Contracted workers      |                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                  | Year 1 Through Year 5 |
|                                                  | 0 Community workers       |                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                  | Year 1 Through Year 5 |
| Location 2: Cluster 1 Roads (300km)              | 11 Direct workers         | Administration, finance, procurement, technical, safeguards, engineering, monitoring, contract management                                                                            | Administrative, technical specialists, engineers, environmental and social specialists, occupational health and safety specialists, architecture                                                                                                                                 | Year 1 Through Year 5 |
|                                                  | 3,246 Contracted workers  | Civil/construction works, engineering, safeguards, construction supervision, IT, quarry works, gravel and laterite supplies, bitumen supplies, equipment and materials supply chains | Construction workers, technical supervisory, masonry, carpentry, labourers, installers, surveyors, equipment operators, maintenance workers, IT and WIGRAMS specialists, quarry workers, gravel and laterite suppliers, bitumen suppliers, equipment and materials supply chains | Year 1 Through Year 5 |
|                                                  | 446 Community workers     | Unskilled site assistance, minor clearing, local support labour                                                                                                                      | Unskilled labour-based routine labourers, watchmen, maintenance groups, community safety stewards                                                                                                                                                                                | Year 1 Through Year 5 |
| Location 3: Cluster 2 Roads (300km)              | 11 Direct workers         | Administration, finance, procurement, technical, safeguards, engineering, monitoring, contract management                                                                            | Administrative, technical specialists, engineers, environmental and social specialists, occupational health and safety specialists, architecture                                                                                                                                 | Year 1 Through Year 5 |

**GMAC PROJECT: LABOR MANAGEMENT PROCEDURES**

| <b>Project location</b>             | <b>Number and type of worker</b> | <b>Type of job</b>                                                                                                                                                                   | <b>Skills required</b>                                                                                                                                                                                                                                                           | <b>Timing of labor need</b>  |
|-------------------------------------|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
|                                     | 3,246 Contracted workers         | Civil/construction works, engineering, safeguards, construction supervision, IT, quarry works, gravel and laterite supplies, bitumen supplies, equipment and materials supply chains | Construction workers, technical supervisory, masonry, carpentry, labourers, installers, surveyors, equipment operators, maintenance workers, IT and WIGRAMS specialists, quarry workers, gravel and laterite suppliers, bitumen suppliers, equipment and materials supply chains | <i>Year 1 Through Year 5</i> |
|                                     | 446 Community workers            | Unskilled site assistance, minor clearing, local support labour                                                                                                                      | Unskilled labour-based routine labourers, watchmen, maintenance groups, community safety stewards                                                                                                                                                                                | <i>Year 1 Through Year 5</i> |
| Location 4: Cluster 3 Roads (250km) | 10 Direct workers                | Administration, finance, procurement, technical, safeguards, engineering, monitoring, contract management                                                                            | Administrative, technical specialists, engineers, environmental and social specialists, occupational health and safety specialists, architecture                                                                                                                                 | <i>Year 1 Through Year 5</i> |
|                                     | 2,435 Contracted workers         | Civil/construction works, engineering, safeguards, construction supervision, IT, quarry works, gravel and laterite supplies, bitumen supplies, equipment and materials supply chains | Construction workers, technical supervisory, masonry, carpentry, labourers, installers, surveyors, equipment operators, maintenance workers, IT and WIGRAMS specialists, quarry workers, gravel and laterite suppliers, bitumen suppliers, equipment and materials supply chains | <i>Year 1 Through Year 5</i> |
|                                     | 335 Community workers            | Unskilled site assistance, minor clearing, local support labour                                                                                                                      | Unskilled labour-based routine labourers, watchmen, maintenance groups, community safety stewards                                                                                                                                                                                | <i>Year 1 Through Year 5</i> |
| Location 5: Cluster 4 Roads (200km) | 10 Direct workers                | Administration, finance, procurement, technical, safeguards, engineering, monitoring, contract management                                                                            | Administrative, technical specialists, engineers, environmental and social specialists, occupational health and safety specialists, architecture                                                                                                                                 | <i>Year 1 Through Year 5</i> |
|                                     | 1,623 Contracted workers         | Civil/construction works, engineering, safeguards, construction                                                                                                                      | Construction workers, technical supervisory, masonry, carpentry, labourers, installers, surveyors, equipment operators, maintenance                                                                                                                                              | <i>Year 1 Through Year 5</i> |

| Project location | Number and type of worker | Type of job                                                                                                          | Skills required                                                                                                                              | Timing of labor need  |
|------------------|---------------------------|----------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
|                  |                           | supervision, IT, quarry works, gravel and laterite supplies, bitumen supplies, equipment and materials supply chains | workers, IT and WIGRAMS specialists, quarry workers, gravel and laterite suppliers, bitumen suppliers, equipment and materials supply chains |                       |
|                  | 223 Community workers     | Unskilled site assistance, minor clearing, local support labour                                                      | Unskilled labour-based routine labourers, watchmen, maintenance groups, community safety stewards                                            | Year 1 Through Year 5 |

### 2.3 Worker profiles

Project workforce is estimated to involve the following types of worker profiles.

**Table 3 – Worker profiles**

| Type of worker     | Male  | Female | National or international migrants | Young workers or apprentices above the minimum allowed age for work but below 18 years. | Young workers between 18 and 25 years. |
|--------------------|-------|--------|------------------------------------|-----------------------------------------------------------------------------------------|----------------------------------------|
| Direct workers     | 40    | 27     | 0                                  | 0                                                                                       | 10                                     |
| Contracted workers | 8,440 | 2,110  | 0                                  | 0                                                                                       | 580                                    |
| Community workers  | 870   | 580    | 0                                  | 0                                                                                       | 290                                    |

No migrant workers are anticipated to work in the workforce.

### 2.4 Contracting structure

Project workforce is estimated to be contracted through the following arrangement:

**Table 3 – Contracting structure**

| Type of worker                     | Will be engaged directly by contractor / sub-contractor | Will be engaged through brokers, intermediaries or agents |
|------------------------------------|---------------------------------------------------------|-----------------------------------------------------------|
| Contracted workers                 | 10,550                                                  | 0                                                         |
| Workers engaged by sub-contractors | 1,400                                                   | 0                                                         |

### 3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The following potential risks are anticipated during different project phases and project activities and will need to be mitigated through proper measures.

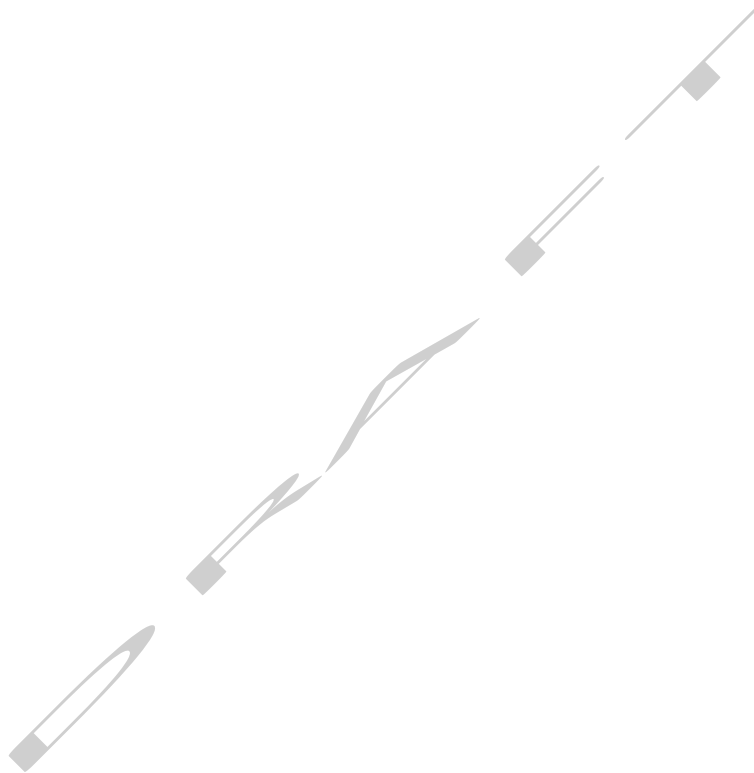
**Table 5 – Anticipated risks by project phase and project activity**

| Project Phase                                                     | Project Activity                        | Anticipated Labour Risks                                                                                                                                                                                                                                              |
|-------------------------------------------------------------------|-----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Phase 1: Project Preparation, Planning and Design</b>          | Recruitment & staffing                  | <ul style="list-style-type: none"> <li>- Discrimination in hiring;</li> <li>- Inadequate documentation of contracts</li> <li>- Lack of GRM for workers</li> </ul>                                                                                                     |
|                                                                   | Field assessments, surveys, site visits | <ul style="list-style-type: none"> <li>- Road traffic accidents</li> <li>- Slips, trips, falls in remote areas</li> <li>- Exposure to harsh weather</li> <li>- Security risks in remote communities</li> <li>- Risks of SEA/SH involving community members</li> </ul> |
|                                                                   | Community consultations                 | <ul style="list-style-type: none"> <li>- SEA/SH risks</li> <li>- Psychological stress caused by confrontations or high-tension meetings</li> <li>- Risk of exclusion of some groups</li> </ul>                                                                        |
|                                                                   | Preparation of E&S Instruments          | <ul style="list-style-type: none"> <li>- Work-related stress due to tight deadlines</li> <li>- Ergonomic risks from prolonged computer work</li> </ul>                                                                                                                |
| <b>Phase 2: Procurement, Mobilisation and Site Preparation</b>    | Contractor procurement                  | <ul style="list-style-type: none"> <li>- Risks of unfair labour practices in selection</li> <li>- Lack of labour clauses in contracts</li> </ul>                                                                                                                      |
|                                                                   | Worker mobilisation & induction         | <ul style="list-style-type: none"> <li>- Poor onboarding leading to OHS non-compliance</li> <li>- Lack of accommodation standards (WBG EHS)</li> </ul>                                                                                                                |
|                                                                   | Site clearance, bush cutting            | <ul style="list-style-type: none"> <li>- Lacerations, cuts, snake/insect bites</li> <li>- Noise and dust exposure</li> <li>- Use of untrained labour posing child labour risks</li> </ul>                                                                             |
|                                                                   | Setting up site offices & camps         | <ul style="list-style-type: none"> <li>- Electricity hazards</li> <li>- Fire outbreaks</li> <li>- Inadequate sanitation &amp; water supply</li> <li>- Labour influx causing SEA/SH risks</li> </ul>                                                                   |
| <b>Phase 3: Construction and Civil Works (Highest-Risk Phase)</b> | Earthworks, excavation, grading         | <ul style="list-style-type: none"> <li>- Collapse of trenches</li> <li>- Dust inhalation, heat stress</li> <li>- Heavy machinery accidents</li> </ul>                                                                                                                 |
|                                                                   | Culvert construction & concrete works   | <ul style="list-style-type: none"> <li>- Cement burns, respiratory risks</li> <li>- Falls from height</li> <li>- Electrocuting</li> </ul>                                                                                                                             |

| Project Phase                                                             | Project Activity                             | Anticipated Labour Risks                                                                        |
|---------------------------------------------------------------------------|----------------------------------------------|-------------------------------------------------------------------------------------------------|
|                                                                           | Bitumen works, road surfacing                | - Toxic fumes exposure<br>- Burns from hot materials                                            |
|                                                                           | Haulage & transport of materials             | - Road traffic crashes involving trucks<br>- Over-fatigue from long driving hours               |
|                                                                           | Skilled trades (masonry, carpentry, welding) | - Eye injuries<br>- Noise-related hearing loss<br>- Welding fumes                               |
|                                                                           | Labour teams (manual labourers)              | - Musculoskeletal injuries<br>- Over-exertion<br>- Risks of child labour from local communities |
|                                                                           | Subcontracted works                          | - Wage disputes or delayed payment<br>- Lack of PPE<br>- Poor OHS compliance                    |
|                                                                           | Community interactions                       | - SEA/SH risks<br>- Conflicts with local residents<br>- Spread of communicable diseases         |
|                                                                           | Waste disposal, site sanitation              | - Exposure to hazardous waste<br>- Poor hygiene causing illness                                 |
| <b>Phase 4: Commissioning, Testing and Handing Over of Infrastructure</b> | Inspections and testing                      | - Falls from heights<br>- Re-entry into confined spaces                                         |
|                                                                           | Corrective works                             | - OHS risks similar to civil works but lower intensity                                          |
|                                                                           | Demobilisation                               | - Traffic accidents during removal of machinery<br>- Waste handling hazards                     |
|                                                                           | Environmental clean-up                       | - Exposure to debris, hazardous residues                                                        |
| <b>Phase 5: Operations, Maintenance and Monitoring</b>                    | Routine maintenance                          | - Machinery and traffic accidents<br>- Slips, trips, falls                                      |
|                                                                           | Monitoring missions                          | - Travel-related accidents<br>- Exposure to adverse weather                                     |
|                                                                           | Community interactions                       | - SEA/SH risks<br>- Security risks in remote locations                                          |
|                                                                           | Contract management                          | - Stress, excessive workloads                                                                   |

A detailed overview of the potential health and safety risks that may arise during project implementation, together with corresponding mitigation measures, is provided in Annex 10: Health and Safety Hazards and Mitigation Measures. The annex outlines a broad range of potential physical, chemical, biological, ergonomic, psychosocial, fire, traffic, structural, radiation, and emergency-related hazards, and presents clear, practical controls—including engineering and administrative measures, required PPE, training, inspections, and emergency preparedness procedures.

**Note:** *Further details on OHS, including but not limited to a broad range of potential physical, chemical, biological, ergonomic, psychosocial, fire, traffic, structural, radiation, and emergency-related hazards, and presents clear, practical controls—including engineering and administrative measures, required PPE, training, inspections, and emergency preparedness procedures are captured in the site specific ESMPs or OHS action plans.*



#### 4. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

All work undertaken under GMAC Project shall comply with the World Bank's ESF and the ESS2 on Labour and Working Conditions, WB ESIRT procedures, international standards to which Ghana adheres, as well as Ghana's legislation and regulations on labor and working conditions, in particular:

- The 1992 Constitution of the Republic of Ghana
- Labour Act 2003 (Act 651),
- Labour Regulations, 2007 (LI 1833)
- Workmen's Compensation Law, 1987 (PNDCL 187)
- Children's Act, 1998 (Act 560)
- Human Trafficking Act, 2005 (Act 694)
- Domestic Violence Act, 2007 (Act 732)
- Youth Employment Agency Act, 2015 (Act 887)
- Hazardous Child Labour Activity Framework, 2022
- Fair Wages and Salaries Commission Act, 2007 (Act 737)
- Factories, Offices, and Shops Act, 1970 (Act 328)
- Persons with Disability Act, 2006 (Act 715)
- National Employment Policy (NEP), 2014
- National Gender Policy, 2015
- National Child and Family Welfare Policy, 2015
- Justice for Children's Policy, 2015
- National Workplace HIV/AIDS Policy, 2004
- The Right to Information Act, 2019 (Act 989)
- Criminal Offences (Amendment) Act, 2023 (Act 1101)
- Data Protection Act, 2012 (Act 843)

A detailed description of requirements of ESS2, national legislation and regulations, gaps and differences between national legislation and ESS2 and measures to overcome those gaps in substantial and high-risk projects, as well as in low and medium risk projects, is available in Annex 1.

## 5. RESPONSIBLE STAFF

For implementation and reporting on this LMP, the GMAC Project will engage the following staff with the following responsibilities:

**Table 6 – Responsible staff**

| Job title                                                              | Professional responsibilities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Project Coordinator (PC)/AIT Heads                                     | <ul style="list-style-type: none"> <li>- Oversee the engagement and management of direct workers.</li> <li>- Manage the engagement and oversight of supervising consultants, contractors and subcontractors.</li> <li>- Build and strengthen the capacity of stakeholders to ensure compliance with the LMP in alignment with the Ghana Labour Act and ESS2 requirements.</li> <li>- Oversee labour and working conditions audits and ensure environmental and social compliance through periodic audits.</li> <li>- Facilitate training programs for project staff and community-level stakeholders on LMP implementation.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Environmental, Social and Gender-based violence Specialists of DFR AIT | <ul style="list-style-type: none"> <li>- Ensure compliance and implementation of LMP provisions across project activities.</li> <li>- Integrate LMP requirements in bidding documents and ensure contractors are fully aware of labour standards and obligations.</li> <li>- Develop LMP as a stand-alone document or integrate it into the site-specific ESMP for each subproject.</li> <li>- Monitor and enforce prohibition of child labour and forced labour in any form.</li> <li>- Conduct safety training for workers, guide form-filling, accident reporting, and other required documentation.</li> <li>- Prepare and submit quarterly monitoring reports on labour management performance to project stakeholders and the World Bank.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Supervising Consultants                                                | <ul style="list-style-type: none"> <li>- Ensure compliance and implementation of LMP provisions across project activities.</li> <li>- Monitor and enforce prohibition of child labour and forced labour in any form.</li> <li>- Ensure contractors are fully aware of labour standards and obligations.</li> <li>- Ensure that project contractors adhere to measures to ensure:                             <ul style="list-style-type: none"> <li>- non-discrimination and equal opportunities for workers</li> <li>- project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment.</li> <li>- project workers will be paid on a regular basis as required by national law and labor management procedures. Deductions from payment of wages will only be made as allowed by national law or the labor management procedures, and project workers will be informed of the conditions under which such deductions will be made</li> <li>- contractors set up a functional workers GRM</li> </ul> </li> <li>- Monitor and verify OHS compliance at all project sites, including review of OHS plans, incident reporting, PPE use, and adherence to WBG EHS Guidelines and GIIP.</li> <li>- Prepare and submit quarterly monitoring reports on labour management performance to project stakeholders and the World Bank.</li> </ul> |
| E&S Specialists of Supervising Consultants                             | <ul style="list-style-type: none"> <li>- Oversee the implementation of LMP measures by contractors, including compliance with OHS, SEA/SH, COVID-19 protocols, and grievance redress mechanisms.</li> <li>- Regular inspections and monitoring of contractor activities should be conducted to ensure alignment with the Labour Act and ESS2.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

|                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                             | <ul style="list-style-type: none"> <li>- Collaborate with contractors to address and rectify non-compliance reports to PCU on progress.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Contractors                                 | <ul style="list-style-type: none"> <li>- Prepare Contractor Environmental and Social Management Plan which would include a labour management plan.</li> <li>- Implement transparent and non-discriminatory recruitment processes.</li> <li>- Ensure all workers have written employment contracts outlining clear terms of employment.</li> <li>- Prohibit child labour and forced labour in any form.</li> <li>- Provide fair and timely payment of wages in line with national minimum wage laws.</li> <li>- Ensure equal pay for equal work, regardless of gender, ethnicity, or background.</li> <li>- Prepare and implement a site-specific OHS Plan in compliance with national OHS regulations and WBG EHS Guidelines and Good International Industry Practice (GIIP).</li> <li>- Appoint a qualified OHS officer at each project site responsible for day-to-day OHS oversight and compliance.</li> <li>- Establish and maintain a safe work environment in compliance with OHS regulations.</li> <li>- Conduct mandatory OHS induction for all workers prior to commencing site activities.</li> <li>- Conduct regular safety training, risk assessments, and emergency preparedness drills.</li> <li>- Provide personal protective equipment (PPE) and ensure its proper use.</li> <li>- Record, investigate, and report all OHS incidents, accidents, and near-misses to the AIT and Supervising Consultant in a timely manner.</li> <li>- Develop and maintain an accessible GRM for workers to report grievances related to working conditions, discrimination, or harassment.</li> <li>- Ensure grievances are addressed promptly, fairly, and without retaliation.</li> <li>- Ensure that all subcontractors comply with the same labour standards and contractual obligations.</li> <li>- Conduct due diligence and regular audits to verify compliance by subcontractors.</li> </ul> |
| Project Manager – Contractor                | <ul style="list-style-type: none"> <li>- Ensure primary suppliers and their workers comply with labour laws, prohibiting child labour, forced labour, and bonded labour.</li> <li>- Implement monitoring mechanisms to assess and verify compliance with fair labour practices among primary suppliers.</li> <li>- Establish procedures for addressing safety risks associated with primary supply workers, including corrective actions where significant safety issues are identified.</li> <li>- Conduct periodic risk assessments of primary supply chains and enforce corrective measures to maintain compliance with labour standards.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| OHS Officers of Contractors/ Subcontractors | <ul style="list-style-type: none"> <li>- Implement site-specific health and safety measures as outlined in the LMP.</li> <li>- Conduct daily safety checks and maintain records of workplace incidents and corrective actions.</li> <li>- Train workers on OHS protocols, usage of PPE, and emergency response procedures.</li> <li>- Ensure compliance with safety standards, including periodic OHS audits and monitoring.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

These staff will be organized as follows:



**Figure 1: Organogram**

## 6. POLICIES AND PROCEDURES

The project, any contractor and third parties (subcontractors, brokers, agents and intermediaries) through accepting a contract to work on the project shall commit to the following policies and procedures and shall sign a Code of Conduct (Annex 2) upon agreeing to supply work and workers to the project:

**Table 7 – Workplace policies and procedures**

| Policy                                   | Commitment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Procedure                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Non-discrimination and equal opportunity | The project and all workplaces offered by the project shall demonstrate a commitment to diversity and equal opportunities for all employees offer inclusive work environments where all individuals are treated with dignity and respect. Discrimination based on race, gender, age, religion, disability, or any other protected characteristic is strictly prohibited. The project and all workplaces offered by the project shall actively ensure the protection of vulnerable workers by ensuring fair treatment, safe working conditions, and access to support. Every employee has the right to work with dignity and respect, and to work in a supportive environment. | To ensure non-discrimination and equal opportunity the borrower will ensure and require contractors and third parties to: <ul style="list-style-type: none"> <li>▪ Ensure recruitment procedures and work contracts that enable and oblige equal opportunity and fair treatment for women, youth over 15 years, people with disability, people living with HIV/AIDS and any other category of people, in contractual documents.</li> <li>▪ Monitor compliance of contractors and third parties with equal opportunity and non-discrimination principles in recruitment and hiring, compensation, working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.</li> <li>▪ Provide training on the safeguarding of vulnerable workers, non-discrimination and equal opportunities principles.</li> <li>▪ Ensure access to a Grievance Redress Mechanism (GRM) with special provisions for sensitive cases.</li> </ul> |
| Occupational Health and Safety (OHS)     | The project and all workplaces offered by the project shall demonstrate and prioritize occupational health and safety of workers, ensuring a risk-free                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | To ensure OHS management, the borrower will ensure and require contractors and third parties to: <ul style="list-style-type: none"> <li>• Identify potential hazards to project workers prior to initiating work.</li> <li>• Based on potential hazards, define preventive and protective measures and train project workers on OHS-measures.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

|                                                                            |                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                            | <p>environment for all employees. Compliance with safety regulations, proactive hazard prevention, and employee well-being are fundamental. Training, protective measures, and reporting mechanisms shall be put in place to provide a safe, secure, and healthy workplace for everyone.</p>                                                                         | <ul style="list-style-type: none"> <li>• Define OHS standards and implementation guidelines for workplaces.</li> <li>• Assign a person responsible for OHS and define tools, procedures and routines for OHS workplace monitoring (when where and by whom)</li> <li>• Undertake documentation and reporting of occupational accidents, diseases and incidents.</li> <li>• Have emergency prevention and preparedness and response arrangements in place to respond to emergency situations</li> <li>• Have remediation protocols pre-defined for eventual adverse impacts such as occupational injuries, deaths, disability and disease.</li> <li>• Ensure appropriate budget for implementation of these procedures.</li> </ul> |
| Freedom of association                                                     | <p>Workers on this project have the right to form and to join workers' organizations of their choosing, to bargain collectively without interference, and employers shall respect the role of legally established workers' organizations and workers' representatives.</p>                                                                                           | <p>To ensure freedom of association the borrower will ensure and require contractors and third parties to:</p> <ul style="list-style-type: none"> <li>• Not restricting project workers from expressing their grievances and protecting their rights and to not seek to influence, control mechanisms for grievances, not discriminate or retaliate against project workers who participate, or seek to participate, in such workers' organizations and collective bargaining.</li> <li>• Monitor compliance of contractors and third parties with those rights.</li> </ul>                                                                                                                                                      |
| Prevention of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) | <p>The project and all workplaces offered by the project shall apply a zero-tolerance approach to sexual exploitation, abuse, and harassment. Misconduct will be met with strict disciplinary action. Reporting is encouraged and whistleblowers shall be offered protection. It is everyone's duty to uphold dignity, integrity, and equality in the workplace.</p> | <p>To prevent SEA/SH the borrower will ensure and require contractors and third parties to:</p> <ul style="list-style-type: none"> <li>• Follow training on sexual exploitation, abuse, and harassment.</li> <li>• Ensure workers have access to and are informed about special procedures of a grievance mechanism for sensitive cases, that whistleblowers are given full protection, and that disciplinary action are enforced in case of misconduct.</li> </ul>                                                                                                                                                                                                                                                              |

|                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Prevention of child labor | <p>The project promotes the participation of children in work that takes into account their age, abilities, and developmental and educational needs. Access to work for children who have reached the minimum working age that is appropriate to their age and development is a key strategy to prevent child labor<sup>2</sup>. When young persons below 18 years and above the minimum age for work are engaged in connection with the project, this should be done with commitment to ethical practices and through provision of a safe environment for all young individuals and under strict compliance with labor laws and guidelines to ensure the safety, rights, and well-being of minors.</p> | <p>The prevention of child labor shall be done through the implementation of the following procedures:</p> <ul style="list-style-type: none"> <li>• Age and identity should be verified for all workers through different methods: birth registration or official ID card and in the absence of that through a method that triangulates at least two different sources, e.g., school records, collecting testimonies from someone who knows the person.</li> <li>• Require all contracted employers to keep a register of workers with names, dates of birth or their apparent ages.</li> <li>• Request all contracted employers to establish a policy and code of good conduct for the protection of children at work.</li> <li>• Require all contracted employers to establish a workplace list that defines the tasks prohibited for children under 18 that is informed from the Ghana Hazardous Child Labour Activity Framework, 2022.</li> <li>• Require all contracted employers to appoint a person responsible for monitoring working conditions of children under 18.</li> <li>• Require all contracted employers to establish an occupational health and safety policy and plan that defines the procedures for replacing a sick or injured worker that ensures that children do not replace adults for dangerous tasks.</li> <li>• Require all contracted employers to record and report all suspected cases of suspected child labor in connection with or as unintended impact of project activities.</li> <li>• Require all contractors to draw up an awareness and training schedule given the various work risks, including child labor. This training must cover the working conditions of young workers.</li> </ul> <p>Engagement of a young person under 18 years and above the minimum age for work can be done:</p> |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

<sup>2</sup> Child labor is a legal definition that is defined in ILO Conventions 138 and 182, the UN Convention on the Rights of the Child, a definition that has further been adopted in the Ghana Labour Act, 2003 (Act 651), the Labour Regulations Legislative Instrument and the Children's Act, 1998 (Act 560). It refers to the type of work that is exploitative, depriving children of their childhood, their potential and their dignity, that is harmful to physical and mental development and that is mentally, physically, socially or morally dangerous and harmful to children; and/or that interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

|                                        |                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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|                                        |                                                                                                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>• Only after receiving informed written parental or caregiver consent (Annex 3 and Annex 4)</li> <li>• After an appropriate risk assessment has been done at the workplace prior to engaging work.</li> <li>• Under condition that a medical practitioner has certified that the young person is in good health and is medically fit for work.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Prevention of forced labor             | The project will implement strict policies to ensure ethical labor practices throughout operations and supply chains, including conducting due diligence, enforcing supplier compliance, and providing grievance mechanisms to protect workers from exploitation. | <p>Require all contracted employers to</p> <ul style="list-style-type: none"> <li>• Communicate the terms of employment in writing</li> <li>• Comply with applicable laws and regulations with regards to terms of conditions of employment.</li> <li>• Inform its employees, contractors and third parties about the applicable zero-tolerance for slavery, human trafficking, forced labor</li> <li>• Inform employers, contractors and third parties about an obligation to report violations.</li> <li>• Conduct assessments to ascertain compliance of third parties.</li> </ul> <p>Contracted employers shall not, and will also assess and ensure that their sub-contractors do not:</p> <ul style="list-style-type: none"> <li>• Deny employees access to his/her immigration documents such as passports, driving license, etc.,</li> <li>• Use misleading recruitment practices,</li> <li>• Use recruiters that do not comply with Labour Laws of Ghana or the law of the country/place where the recruitment takes place,</li> <li>• Fail to provide a flight ticket to destination or country of permanent residence at the end of contract/employment,</li> <li>• In the event of violation, we shall take action against the violating employee or contractor to include termination of contract and remediation of victim.</li> </ul> |
| Transparent and fair hiring of workers | The project is committed to transparent and fair hiring which ensures that all candidates are evaluated based on merit, with clear job descriptions, unbiased selection criteria, and open                                                                        | <p><b>Hiring Procedures</b></p> <p>Direct and contracted workers will be hired through open competition using the following procedures:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

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|  | <p>communication throughout the recruitment process. This includes eliminating discrimination, providing equal opportunities, and maintaining integrity in hiring decisions to build trust and attract top talent.</p> | <ol style="list-style-type: none"> <li>1. Job opportunities will be advertised on the employer's / company's website, local newspapers, local radios and on public notices within the subproject vicinity with at least two weeks to application deadline.</li> <li>2. Advertisements for work opportunities, other than describing the minimum profile of applicants and the job description, shall explicitly state that the employer applies a non-discrimination and equal opportunity principle in recruitment, that it encourages women, people with disabilities and other vulnerable groups to apply, that the employer / company commits to making adaptations for inclusion of such vulnerable group in accordance with requirements of the Labour Act</li> <li>3. Compensation for work is based on a principle of equal pay between employees for the same work or work of equal value</li> <li>4. The opportunity to be retained for work of pregnant women, or women with small babies should be equal to that of other persons with appropriate adjustments for their needs in employment in accordance with the Labour Act.</li> <li>5. Information submitted to an employer / company during the recruitment process shall be treated with confidentiality.</li> </ol> <p><b>Establishment of contracts</b></p> <p>Written contracts shall be drawn up for all direct and contracted workers hired. Contracts shall include the following minimum information:</p> <ul style="list-style-type: none"> <li>• The date and place of establishment of the contract.</li> <li>• The employer's name, first name, profession and address.</li> <li>• The worker's name, first names, gender, date and place of birth, parentage, domicile and nationality, trade or profession.</li> <li>• Job title, job description and reporting lines in the company's hierarchy.</li> <li>• Workplace and possible travel.</li> </ul> |
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|                              |        | <ul style="list-style-type: none"> <li>• Nature of contract, duration of contract, starting date, eventual trial period, notice period for termination of employment, and any eventual compensation package for early termination of contract (as applicable).</li> <li>• Working hours, rest periods and times, annual holidays and leave.</li> <li>• Salary, rules for defining salaries, wages and other benefits, including rules regarding the frequency of payments and deductions.</li> <li>• Overtime rules and remuneration for overtime.</li> <li>• Information on accommodation, compensation for food and other required payments, as applicable.</li> <li>• Social protection coverage, such as pension plans, medical insurance, maternity benefits.</li> <li>• Reference to regulatory texts or collective agreements which govern all relations between employers and workers.</li> <li>• A reference to the GRM and the Code of Conduct.</li> <li>• Other specific clauses agreed between the parties.</li> </ul> |
| Transparent<br>documentation | worker | <p>The project is committed to ensuring and doing due diligence to ensure that contractors have employment records, contracts, and policies that are clearly communicated, easily accessible, and accurately maintained. This includes providing workers with full visibility into their rights, responsibilities, and benefits, fostering trust and compliance with labor regulations.</p> <p><b>Documentation and register of employees and workers</b></p> <ul style="list-style-type: none"> <li>• Employers shall keep up to date, at the place of operation, a register of workers called "employer register" with workers name, date of birth, job title, job description and reporting lines in the company's hierarchy for each employee.</li> <li>• Companies employing workers to provide labor for the project shall be able to submit documentation on all workers hired, upon request of the GMAC Project and the World Bank if and as required.</li> </ul>                                                          |

## 7. AGE OF EMPLOYMENT

In accordance with ESS2, International Conventions (ILO Convention 138 and 182 and the Convention on the Rights of the Child and the African Charter on the Rights and Welfare of the Child), national legislation and regulations (Labour Act No 651 of 2003 and the Children's Act 560 of 1998), individuals under the age of 18 years are authorized to work in connection with the project on condition that the work is not hazardous and that minimum age requirements, and special labor conditions are respected for these workers. The following minimum age-standards and working conditions apply on the project:

**Table 8 – Minimum age standards**

| Type of work/employment        | Authorized light work                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Authorized full time employment                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Hazardous work                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Minimum age                    | 14 years                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | At least 15 years or after finishing compulsory education                                                                                                                                                                                                                                                                                                                                                                                                                               | 18 years with appropriate OHS measures.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Definitions                    | Non-hazardous, light work is not an employment. It is limited to helping in activities for purposes of education and social integration outside of school hours or during school holidays.                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Normal work under a labor contract that nevertheless needs to be non-hazardous and adapted to child's age and special needs as a vulnerable worker.                                                                                                                                                                                                                                                                                                                                     | Work that can jeopardize the health or physical, mental, moral or social development of the child.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Specific conditions that apply | <ul style="list-style-type: none"> <li>• Should always be undertaken under the supervision of an adult.</li> <li>• Should not jeopardize the health or physical, mental, moral or social development of the child.</li> <li>• Should not compromise the school attendance and participation of the child. This includes not compromising the child's possibility to do homework, prepare for tests and benefit fully from education.</li> <li>• Should not take place at night-time (before 6 a.m. or after 8 p.m.) or during regular school hours.</li> <li>• It should not exceed 2 hours for a school day and 4 hours for a non-school day.</li> </ul> | <ul style="list-style-type: none"> <li>• That weekly rest periods and right to holidays are respected (same as for 18+)</li> <li>• The work does not exceed 8 hours of work per day and 43 hours per week if the work is not heavy manual work. If the work takes place in heavy manual work occupations, the work should not exceed 4 hours per day and 25 hours per week</li> <li>• The work should not take place at night-time, that is before 6:00 AM and after 8:00 PM</li> </ul> | Prohibition for workers under 18 years to undertake any work that involves <sup>3</sup> : <ul style="list-style-type: none"> <li>• Manual lifting of loads the weight of which exceeds twenty-five kilograms.</li> <li>• Work on scaffold and other structures at a height exceeding two and a half meters,</li> <li>• The use of substances and materials that emit (i) radiation, or (ii) poisonous gases or fumes,</li> <li>• The use of dangerous chemicals.</li> <li>• Excessive noise.</li> <li>• The felling of timber.</li> <li>• Night work, that is before 6 AM and after 8 PM</li> </ul> |

<sup>3</sup> In accordance with Ghana Labour Regulations, 2007.

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|  | <ul style="list-style-type: none"> <li>• The effective weekly working hours should not exceed 12 hours for a school week and 14 hours for a non-school week.</li> <li>• None of the tasks undertaken should be hazardous tasks.</li> <li>• Sector specific light work that can be permitted on the project should be listed in the Ghana Hazardous Child Labour Activity Framework 2022.</li> </ul> |  | <ul style="list-style-type: none"> <li>• Work exceeding eight continuous hours.</li> <li>• Work in areas which are likely to corrupt the moral development of that young person.</li> <li>• Sector specific hazardous work as detailed in the Ghana Hazardous Child Labour Activity Framework 2022 or other situations considered by the Chief Labour Officer as hazardous is prohibited for children under 18 years.</li> </ul> |
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## 8. TERMS AND CONDITIONS

The following terms and conditions apply to workers on the GMAC Project.

**Table 8 – Terms and conditions**

| Condition          | Applicable standard                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Contract           | <ul style="list-style-type: none"> <li>Workers are engaged with a written contract that specifies terms and conditions of the work</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Hours of work      | <ul style="list-style-type: none"> <li>Full-time work consists of a maximum of 8 hours a day or forty hours a week.</li> <li>A workday is normally from 8 AM to 5 PM with an hour break five days a week</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                             |
| Compensation       | <ul style="list-style-type: none"> <li>Compensation shall be above minimum wage and in accordance with relevant collective bargaining agreements and shall be in line with the provisions of the constitution and other labor laws.</li> <li>Wages are negotiated every three years as stipulated in the labor laws.</li> <li>Overtime work shall be compensated for as per relevant sector collective bargaining agreements.</li> </ul>                                                                                                                                                                                        |
| Leave              | <ul style="list-style-type: none"> <li>All workers are made to enjoy regular leaves, maternity leave and other such leaves and the accompanying benefits consistent with the national labor laws</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Vulnerable workers | <ul style="list-style-type: none"> <li>Special conditions apply to vulnerable workers (for children see previous section).</li> <li>Pregnant women shall not be assigned to do night work or overtime unless it is with her consent.</li> <li>Pregnant workers or mothers of a child of less than eight months old shall not be engaged for overtime against her consent. Pregnant women shall not be assigned to a post outside her place of residence after the completion of the fourth month of pregnancy, if the assignment, in the opinion of a medical practitioner or midwife, is detrimental to her health.</li> </ul> |
| Notice             | <ul style="list-style-type: none"> <li>Workers are made aware of the period of notice for resignation, and other duty excuses in line with national laws and best international practices.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                           |

These terms and conditions apply to all direct workers and contracted workers. Third parties are required to:

|                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sub Project Contractors and Sub-Contractors | <ul style="list-style-type: none"> <li>Are provided and sign written employment contracts for all workers upon hiring.</li> <li>Shall inform hired workers of all employment related information and ensure that the workers understand the rights and obligations of both parties under the contract.</li> <li>Shall ensure that their 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 in a language they understand.</li> </ul> |
|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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Terms and Conditions for Engagement of Community Workers:

Where GMACP requires community labour, community workers shall be engaged only for clearly defined, low-risk, non-technical activities that support road rehabilitation, maintenance, road-asset protection, community monitoring and project sustainability. Community labour shall not substitute for qualified technical personnel or contractors and shall not be used for activities requiring specialized skills, certification, heavy machinery or exposure to significant occupational hazards.

Community labour shall be provided on a voluntary basis and based on the free and informed consent of the individual or community. No person shall be compelled, threatened, deceived or otherwise pressured to participate in community labour, and workers shall be free to withdraw their consent without retaliation. The process through which community labour is agreed and the representation of community workers shall be documented.

Before engagement, the Project, contractor or designated implementing entity shall explain the nature of the work, tasks, duration, working hours, payment or other agreed benefits, applicable safety requirements, grievance arrangements and other relevant terms in a language and form understandable to the community workers. The agreed terms shall be documented through a community labour engagement record or equivalent agreement.

Community workers shall be engaged without discrimination and shall be subject to appropriate age verification. Child labour and forced labour are prohibited. For GMACP road-related community labour, persons below 18 years shall not be engaged in field labour activities.

Working hours shall be agreed in advance and shall normally be restricted to daylight hours, with adequate rest and meal breaks. Work shall be suspended where weather, traffic, flooding, visibility or other conditions create unacceptable risks.

The Project shall undertake a task-specific assessment of occupational health and safety risks and shall provide community workers with appropriate induction, training, supervision, information and personal protective equipment at no cost to the workers where PPE is required. Community workers shall have the right to refuse or stop work where they reasonably believe that an imminent and serious danger exists, without retaliation, and shall immediately report the condition to the supervisor.

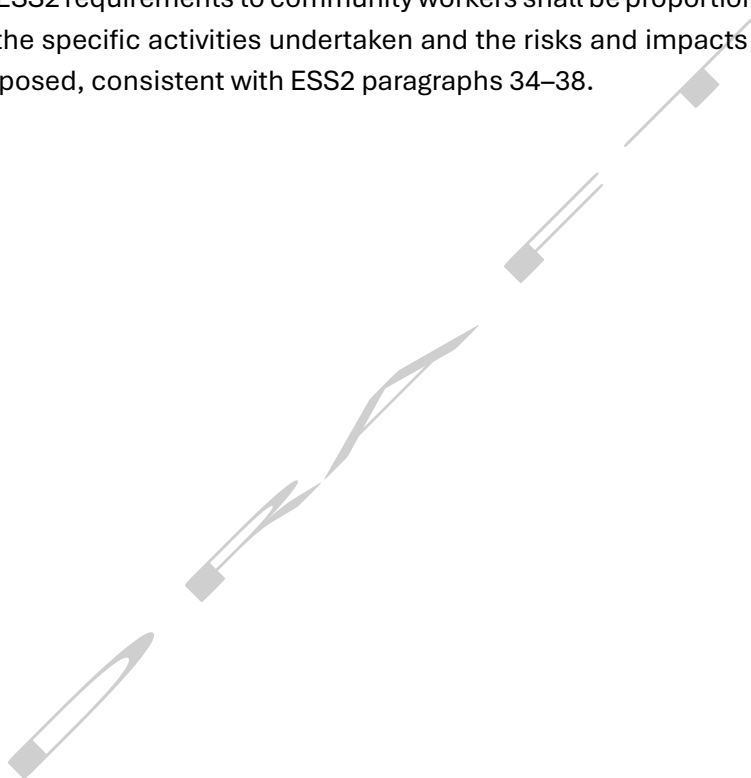
Where payment is applicable, the amount, basis, method and timing of payment shall be agreed and communicated before work begins. Payment shall be made transparently and records shall be maintained. Where labour is provided as a voluntary community contribution without monetary payment, the nature and basis of the contribution and any agreed non-monetary benefits shall be documented.

Community workers shall receive orientation on the GMACP Code of Conduct, prohibition of child and forced labour, GBV/SEA/SH, respectful workplace behaviour, community health and safety, environmental protection and grievance procedures. Sensitive grievances, including GBV/SEA/SH complaints, shall be handled confidentially and through survivor-centred procedures.

Community workers shall have access to the GMACP grievance mechanism and shall be informed of accessible channels for raising concerns relating to their engagement, working conditions, payment, safety, discrimination, harassment or other project-related matters. The grievance mechanism shall be adapted where necessary to reflect the characteristics of community workers and the local context.

The DFR/AIT, relevant MMDA or designated contractor shall maintain appropriate records of community-worker engagement, including the nature of work, number and profile of workers, duration, payment arrangements where applicable, training provided, incidents, grievances and corrective actions. Monitoring shall verify that community labour remains voluntary, appropriately supervised, adequately protected and limited to the activities agreed under the community labour arrangement.

The application of ESS2 requirements to community workers shall be proportionate to the nature and scope of GMACP, the specific activities undertaken and the risks and impacts to which community workers may be exposed, consistent with ESS2 paragraphs 34–38.



## 9. GRIEVANCE MECHANISM

Workers on the project will have access to a grievance mechanism where they can report any workplace issue of concern. In addition to the worker grievance mechanism, there is an overall mechanism for the project where broader concerns and issues in relation to the project can be reported. The World Bank also has a global grievance and redress service. Each grievance mechanism has its specific entry points, functions and procedures, as per Table 9 below:

**Table 9 – Grievance and redress mechanisms for World Bank financed projects**

|                    | <b>Grievance Mechanism for Workers</b>                                            | <b>Project Grievance Redress Mechanism</b>                                                                                                | <b>World Bank Grievance and Redress Service (GRS)</b>                                                                                                                                                                                                                                                                                              |
|--------------------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Entry Point</b> | Through entry points set up by and advertised/managed by the employer/contractor. | Through entry points set up by and advertised/managed by the project PIU/PCU                                                              | World Bank website through online form <sup>4</sup> , email ( <a href="mailto:grievances@worldbank.org">grievances@worldbank.org</a> ) or World Bank Headquarters or Country Office, using a form available on the World Bank Global website <sup>5</sup> .                                                                                        |
| <b>Functions</b>   | Receive and address workplace and contractual concerns                            | A mechanism where anybody can submit any concern related to the project's impact, functioning, a contractor, sub-contractor, third party. | A platform for individuals and communities to submit complaints directly to the World Bank if they believe that a World Bank-supported project has or is likely to have adverse effects on them, their community, or their environment.                                                                                                            |
| <b>Procedures</b>  | As per description in Section 9.5 of this LMP                                     | As per description of the Stakeholder Engagement Plan (SEP)                                                                               | As per description on the WB global GRS website <sup>6</sup><br>Procurement-related complaints are submitted using specific procedures in accordance with guidelines on the Grievance and Redress Services website <sup>7</sup> .<br>Allegations of WB Staff misconduct are submitted to the Ethics and Business Conduct Department <sup>8</sup> . |

<sup>4</sup> Online form for global grievance and redress services: <https://wbgcmsgsr.powerappsportals.com/en-US/new-complaint/>

<sup>5</sup> Form to accompany written complaints sent by regular mail for submission to the World Bank Global Grievance and Redress Service: <https://thedocs.worldbank.org/en/doc/743201426857500569-0290022021/original/GrievanceRedressServiceGRScomplaintform.docx>

<sup>6</sup> GRS procedures and information: <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>

<sup>7</sup> Guidance for procurement related complaints: <https://thedocs.worldbank.org/en/doc/6b32629dd1e7e1f60ae23a3daeec2b6a-0290012025/original/Procurement-complaints-filing.pdf>

<sup>8</sup> Procedures for allegations of WB staff misconduct: [https://www.worldbank.org/en/about/unit/ethics\\_and\\_business\\_conduct](https://www.worldbank.org/en/about/unit/ethics_and_business_conduct)

### 9.1 Objective

The grievance mechanism for workers has the objective to ensure early identification of concerns and malfunctions that could lead to individual dissatisfaction or harm, such as injuries and accidents of workers, disputes between employers and employees that could hamper the effectiveness of the project, or reputational risk that could jeopardize the successful conclusion of the project.

### 9.2 Purpose

The purpose of the grievance mechanism for workers is to:

1. Serve as a platform where workers can report and receive advice on their concerns and grievances and from which those concerns and grievances are channelled to management.
2. Identify remedies to concerns that can be implemented through internal procedures in the form of corrective action, mediation, settlement, or dispute resolution.
3. Channel complainants or refer cases to appropriate external mechanisms, including non-state and state-based mechanisms, such as DDSWCD, courts, gender-based violence (GBV) service providers, the Domestic Violence & Victims Support Unit (DOVVSU) of the Ghana Police Force, socio-psychological support units in the case of GBV/SEA/SH or child protection / child labor complaints. Such Complaints would only be referred to external mechanisms for support with the informed consent of the affected party.

### 9.3 General Principles

The grievance mechanism for workers shall operate based on the following principles:

- **Accessibility:** All workplaces, contractors, sub-contractors, and third parties hiring and managing workers that constitute a workforce for the project, shall have clearly advertised where and how worker grievances can be submitted. Employees should be informed about the grievance mechanism through awareness raising and training.
- **Confidentiality and cultural sensitivity:** All cases submitted to the worker GRM shall be treated with cultural sensitivity and with confidentiality within the limits of what is possible for the resolution of the case.
- **Fairness, impartiality and protection from retaliation:** Complainants have the right to have their cases be treated objectively and without bias, and shall be able to report misconduct, discrimination, harassment, unsafe working conditions, or violations of company policies without fear of retaliation.
- **Accountability:** Employee(s) who file grievances shall be notified of the contractor's or employer's findings regarding the complaint, as well as the corrective action to be taken.
- **Adaptation based on severity of the complaint:** The procedures of the worker GRM shall be adapted to the severity of the cases, based on a pre-established case typology.

- **Right to appeal and escalate cases:** If a complainant is **unsatisfied** with the outcome of a case, they should have the right to request an appeal or further review, including by a higher-level authority, or to escalate the complaint to any of the other grievance mechanisms / services as described in Table 9.
- **Continuous improvement:** The worker grievance mechanism should be regularly reviewed and improved based on worker feedback and lessons learned from past cases should inform updates and better practices.

#### 9.4 Structure of the Grievance Mechanism

The grievance mechanism for workers will be a multi-tier system, as follows:

- **Lower tier:** Workplace grievance *office* will be available at *contractor level* in the form of *human resource department*. Unless workers prefer to report grievances to a higher tier directly due to sensitivities or other reasons, this will be the entry point for most grievance cases. It is anticipated that most cases will be handled and closed from this level and if this is not possible, cases can be referred to the higher tier for inputs, mediation and resolution.
- **Higher tier:** For more complex or sensitive cases, and/or if cases cannot be resolved by the lower tier, cases can be referred to higher tier of the grievance mechanism. This tier has two pathways, either through the Agency Implementation Teams (AITs) at DFR and MRH, and ultimately to the *Project Coordination Unit's Secretariat located at the Ministry of Roads and Highways*, or through the statutory system, the National Labour Commission or the court system for settlement.

If concerns are not related to individual cases, but of a collective nature or linked to a perceived systemic labor risk in relation to the project, these cases should be addressed to the project grievance mechanism, or if the nature of the complaint is sensitive, could be addressed to the World Bank Global Grievance and Redress Services.

## 9.5 Grievance Procedure

The grievance procedure is as follows:

### Step 1: Submission of a grievance case by a worker

Grievances from workers on the project can be submitted to any of the following entry points:

|                            |                                                                                      |
|----------------------------|--------------------------------------------------------------------------------------|
| Telephone                  | <i>To be specified in site-specific Environmental &amp; Social Management Plans.</i> |
| WhatsApp / Message service | <i>To be specified in site-specific Environmental &amp; Social Management Plans.</i> |
| For direct workers         | <i>To be specified in site-specific Environmental &amp; Social Management Plans.</i> |
| For contracted workers     | <i>To be specified in site-specific Environmental &amp; Social Management Plans.</i> |
| For community workers      | <i>To be specified in site-specific Environmental &amp; Social Management Plans.</i> |

The grievance entry points, as well as the grievance form (available in Annex 6) to be used for submission of a complaint, should be well publicised and easily accessible in all workplaces of the project.

### Step 2: Receipt, registration of grievance case in a grievance record and notification of receipt to the aggrieved party

This step shall be completed within 24-48 hours of the case being received by the GRM depending on the level of severity of the case.

Upon receipt, all cases shall be classified by severity - light, moderate and severe cases - and the grievance form (Annex 6) be registered in a central grievance record that can be accessed through: *To be specified in site-specific Environmental & Social Management Plans.*

The central grievance record is managed by the PCU that makes sure that all grievance cases are allocated a unique number, allowing to track a registered case in the system until it has been closed.

The below case-typology (Table 10) is used to ensure resolution approach that is adapted to the level of severity of the case:

Table 10 – Typology of cases

| Category                                                            | Definition                                                                                                                                                                                                             | Examples of cases                                                                                                                                                                                                                                                                                                                                                                                                                    | Resolution approach                                                                                                                                                                                                                                                                     | Deadlines                                                                                                                                                                                                                                                                                                                                                                      |
|---------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Light Cases: Minor Workplace Issues</b>                          | Day-to-day concerns and/or workplace misunderstandings that do not significantly impact the worker's rights, safety, or well-being. They can often be resolved through direct dialogue or minor procedural adjustments | <ul style="list-style-type: none"> <li>• Misunderstandings, disagreements or conflicts between colleagues.</li> <li>• Scheduling issues such as changes in shifts or confusion over work hours.</li> <li>• Resource access complaints: Lack of office supplies, tools, or workspace concerns.</li> <li>• Minor procedural concerns such as issues with administrative processes, payroll delays (without financial harm).</li> </ul> | <ul style="list-style-type: none"> <li>• Direct resolution between the involved parties.</li> <li>• Supervisor mediation or internal intervention by Human Resource (HR).</li> <li>• Quick administrative fixes or policy clarifications</li> </ul>                                     | <p><b>Notification of receipt to complainant:</b> Within 2 business days of receipt of a complaint</p> <p><b>Preliminary assessment:</b> within 5 business days of receipt of a complaint</p> <p><b>Notification of action:</b> within 10 business days of receipt of a complaint</p> <p><b>Formulation of response:</b> within 20 business days of receipt of a complaint</p> |
| <b>Moderate Cases: Labor Rights &amp; Workplace Safety Concerns</b> | These cases affect an employee's working conditions, dignity, or fair treatment, requiring formal investigation and corrective action.                                                                                 | <ul style="list-style-type: none"> <li>• Unfair treatment: Bias in promotions, wage disparities, or favouritism.</li> <li>• Harassment (non-sexual): Bullying, verbal abuse, intimidation.</li> <li>• Workplace health &amp; safety concerns: Hazardous conditions, lack of proper equipment.</li> <li>• Failure to comply with contracts: Disputes over benefits, overtime pay or agreed job responsibilities.</li> </ul>           | <ul style="list-style-type: none"> <li>• Formal complaint to HR or grievance committee.</li> <li>• Investigation and corrective action with clear documentation.</li> <li>• Mediation or negotiation between affected parties.</li> <li>• Possible escalation if unresolved.</li> </ul> | <p><b>Notification of receipt to complainant:</b> Within 2 business days of receipt of a complaint</p> <p><b>Preliminary assessment:</b> within 5 business days of receipt of a complaint</p> <p><b>Notification of action:</b> within 10 business days of receipt of a complaint</p> <p><b>Formulation of response:</b> within 20 business days of receipt of a complaint</p> |
| <b>Severe Cases: Legal &amp; Ethical Violations</b>                 | Serious misconduct, violations of labor laws, or human rights abuses that demand immediate intervention, legal                                                                                                         | <ul style="list-style-type: none"> <li>• Sexual harassment &amp; abuse: Any form of sexual misconduct, exploitation, or assault.</li> <li>• Workplace discrimination: Based on race, gender, disability, or any protected characteristic.</li> </ul>                                                                                                                                                                                 | <ul style="list-style-type: none"> <li>• Investigation by higher authority and legal reporting if required (government agencies, labor unions).</li> </ul>                                                                                                                              | <p><b>Notification of receipt to complainant:</b> Within 24 hours of receipt of a complaint.</p> <p><b>Preliminary assessment:</b> within 3 business days of receipt of a complaint</p>                                                                                                                                                                                        |

|  |                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                |
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|  | action, or external involvement | <ul style="list-style-type: none"> <li>• Forced labor or human trafficking: Any case where workers are coerced, trapped, or working under exploitative conditions.</li> <li>• Child labor involvement: Employment of children below the minimum age for work, or involvement of a minor in hazardous work or any child labor violations.</li> <li>• Serious safety risks: Severe negligence leading to workplace injuries or fatalities.</li> <li>• Retaliation against whistleblowers: Attempts to silence or punish employees for reporting issues.</li> </ul> | <ul style="list-style-type: none"> <li>• Immediate implementation of protection of affected workers (e.g., whistleblower safety measures).</li> <li>• Investigation followed by disciplinary action or contract termination.</li> <li>• External monitoring of situation post-case-resolution.</li> </ul> | <p><b>Notification of action:</b> within 5 business days of receipt of a complaint</p> <p><b>Formulation of response:</b> within 7 business days of receipt of a complaint</p> |
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### Step 3: Preliminary assessment

A preliminary assessment of the case should be completed within 3 to 5 business days after receipt of the case, depending on the severity of the case as per Table 10.

During the preliminary assessment phase contact will be established with the aggrieved party to gather additional information on the case and the desired method for resolution. Preparatory contacts and arrangements can be made to inform a plan for putting in place an appropriate action. For light cases, the preliminary assessment period may serve as a resolution phase, if simpler remedial actions can be arranged. If immediate remediation is not possible, the preliminary assessment will document the options for remediation and seek any additional information, approvals that are required prior to start the implement of remedial action.

### Step 4: Notification of action

A notification of action, in response to the grievance case shall be communicated to the aggrieved party within 5 to 10 business days after receipt of a complaint. The notification of action will include information from the grievance mechanism on the proposed resolution of the case.

After receiving a notification of action from the grievance mechanism, the aggrieved party has the choice of accepting the proposed action or to engage in dialogue with the grievance mechanism representative for adaptation of the action to the satisfaction of the aggrieved party.

**Step 5: Formulation and implementation of a response**

Within 7 to 20 business days upon receipt of a complaint, timeframe depending on severity of the case, a final resolution should have been formulated and be communicated by the grievance mechanism to the aggrieved party, allowing measures for corrective action to be implemented.

At this point, the grievance mechanism representative shall submit the plan for the corrective action into the central grievance record, using a form (available in Annex 7) to be submitted to *[add website link, address other information on where the form shall be submitted to a central database]* *(To be specified in site-specific Environmental & Social Management Plans.)*

**Step 6: Implementation of corrective action, monitoring and case closure**

Corrective action or activities to remediate a case can take different amounts of time, depending on the severity of the case and does not have an official deadline. When cases are closed it will be compulsory for the level managing the grievance case to submit a case closure form (available in Annex 8) to *[add website link, address other information on where the form shall be submitted to a central database]* *(To be specified in site-specific Environmental & Social Management Plans.)*. This will allow to track open and closed cases in the grievance and redress system.

The aggrieved party will at this point be given a feedback form (available in Annex 9) where he/she can submit feedback on his/her satisfaction with the overall grievance process. Worker grievance satisfaction forms shall be submitted to *[add website link, address other information on where the form shall be submitted to a central database]* *(To be specified in site-specific Environmental & Social Management Plans.)*.

## 9.6 Special considerations and referral procedures for severe cases

Sensitive high-risk cases related to Legal & Ethical Violations (such as sexual harassment, exploitation, or abuse, workplace discrimination, forced labor, human trafficking, or exploitative working conditions, child labor involvement or violations, serious safety risks that have led to injuries or fatalities, retaliation against whistleblowers etc.) require special considerations and may require referrals for remediation and support measures, such as medical or psychosocial support by specialized professionals. For high-risk cases involving children (child labor, sexual exploitation or abuse, violence) there are statutory requirements to involve professionals from Ministry of Gender Children and Social Protection and/or Police, as defined in the Children Act 1998.

The project will establish collaboration protocols with relevant statutory and professional services for such cases to get tailored support and remediation, outside of the project worker grievance mechanism, should such support be needed. Professional or statutory structures will work to implement remediation plans for the victim/survivor and will maintain confidentiality on the work undertaken. The project will ensure sufficient resources for remediation, as defined in case management plans defined by statutory agencies, or as defined by courts, until the case has been fully remediated and can be closed.



Figure 2: Referral pathways for high-risk cases from worker GRM-system

## 10.CONTRACTOR MANAGEMENT

GMAC Project has overall responsibility to ensure that, contractors and third parties who mobilize and engage workers as labor force on the project:

- Are legally constituted and reliable entities
- Are aware of and contractually obliged to uphold the policies established under section six (6).
- Sign the Project Code Conduct available in Annex 2.
- Develop labor management procedures that are appropriate to the project and in compliance with the provisions of ESS2.
- Keep a register of workers called "employer register" that should include location of the work, workers' names, dates of birth, job title, job description and reporting lines in the company's hierarchy for each employee.
- Manage and monitor their sub-contractors in accordance with ESS2, including uphold the policies established in section six (6), sign the code of conduct and keep a register of workers that includes location of the work, workers' names, dates of birth, job title, job description and reporting lines in the company's hierarchy for each employee.
- Timely reporting of incidents and accidents and provide information as requested for the WB ESIRT procedure

GMAC Project will monitor the performance of contractors and third parties and can, at any time inspect their subcontractors through announced or un-announced site visits, review of documents, employer register and any other documentation of relevance to the project implementation.

### 10.1 COMMUNITY WORKERS

Community workers do not need to be engaged in the project in writing, through an employment contract. A community worker shall:

- Offer their services voluntarily.
- Be appropriately trained for the work to be performed in accordance with general and industry-specific Environmental, Health and Safety Guidelines (EHSG).
- Be offered relevant tools and safety equipment to perform the work by the project and free of charge to the worker.
- Upon engagement of community workers, the project will clearly identify and document the terms and conditions on which community labor will be engaged, including amount and method of payment and times of work.

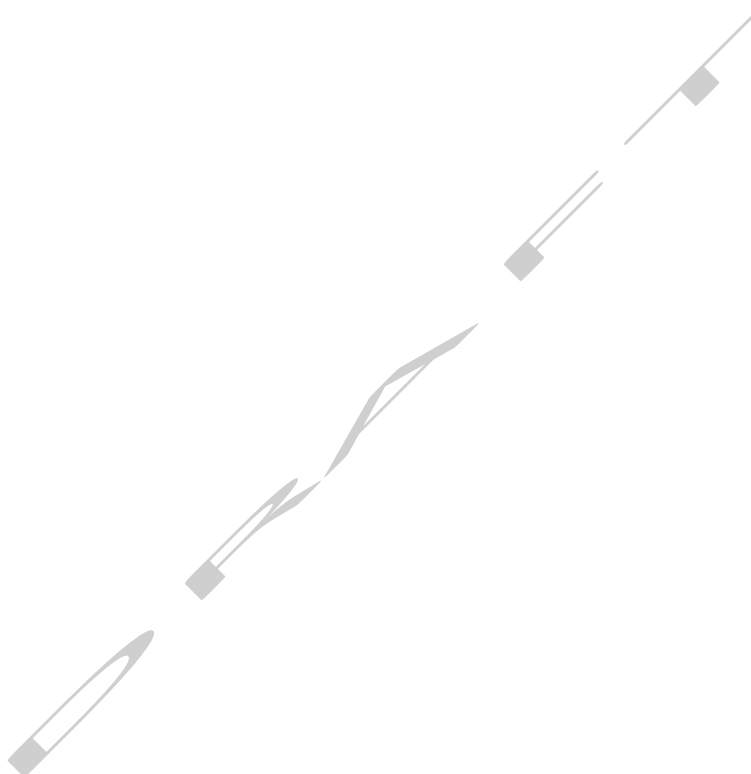
The project PCU/AITs will conduct regular monitoring of community work to verify that these requirements are fulfilled.

Community workers have access to the grievance mechanism through the following entry points: a central toll free phone number, a designated WhatsApp number, email account and other means including walk-in to physical address (All to be specified in the site-specific ESMPs).

## 10.2 PRIMARY SUPPLY WORKERS

Primary supply workers, employed by contractors to the project respond and report to the contractors with whom they have a contract. The project will ensure to hire contractors with good reputation and will monitor that they uphold Ghana's Labour Act (Act 651) and ESS2 requirements, including that primary supply workers receive written contracts by their employer that outlines wages, benefits and working conditions, and otherwise uphold the requirements of the Labour Act (Act 651).

The project PCU/AITs will conduct regular audits to verify that these requirements are fulfilled, and that all the policies and procedures as outlined in this LMP are implemented as planned. Primary supply workers have access to the grievance mechanism through the entry point of its employer, or directly through the PIU/PCU as per the contact details provided under the Grievance and Redress section.



# Annex 1: Legal framework and its applicability on the project

| Requirements of ESS2                                                                                                                                                                                                                                                                                                                                        | National legislation and regulations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Gaps and differences between national legislation and ESS2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| <b>Terms and conditions of employment</b>                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Project workers should be provided with information and documentation on terms and conditions of employment (§10), be paid on a regular basis, provided have adequate periods of rest per week, annual holiday and sick, maternity and family leave (§11), and receive written notice of termination of employment and details of severance payments (§12). | <p>The Constitution of the Republic of Ghana (1992) establishes the right to satisfactory, safe and healthy work, equal pay for equal work, adequate resting periods, maternity leave without distinction of any kind.</p> <p>The National Labour Act, 2003 (Act 651), the Labour Regulations, 2007 (LI 1833) and the National Employment Policy, 2015. Act 651 detail further rights of workers and protections of employment, including:</p> <ul style="list-style-type: none"> <li>▪ Requiring employers to provide workers with written terms and conditions of employment within two months of the start of employment.</li> <li>▪ Protects workers from unfair labor practices, and unfair termination of employment.</li> <li>▪ Elaborate on general conditions of employment, including rights to rest, leisure and reasonable working hours, holidays, access to trained and retrained.</li> <li>▪ Sets the legal basis and institutional infrastructure for fixing the minimum wage via</li> </ul> | <p>Domestic legislation provides sufficient regulation of working conditions in accordance with ESS2, however it:</p> <ul style="list-style-type: none"> <li>▪ Does not prescribe overtime rates or prohibit excessive compulsory overtime</li> <li>▪ There is no legislation determining obligations to supervise and safeguard the interests of workers employed by third parties (contractors, subcontractors, brokers, agents and intermediaries) and community workers</li> <li>▪ Workers operating in the informal economy operate largely outside state regulations with loopholes in labor and business regulations, such as minimum wages, pension insurance, and paying taxes. It very often leads to informal workers receiving wages below the minimum wage.</li> <li>▪ The capacity for monitoring, inspecting and enforcing labor standards, incl. wage law is lacking.</li> </ul> <p>Ministry of Labour Jobs and Employment (MLJE) has the broader responsibility for the labor</p> | <p><b>Substantial and High-risk Projects:</b><br/>Borrower to:</p> <ul style="list-style-type: none"> <li>▪ Prescribe overtime rates and maximum overtime allowed.</li> <li>▪ Assess Labor and Working Conditions risks of projects as part of the ESA process</li> <li>▪ Establish contractual obligations with contractors, subcontractors, brokers, agents and intermediaries to have worker contracts with clear terms and conditions of employment, equal pay for equal work and safe and healthy working conditions.</li> <li>▪ Undertake sporadic inspections of contractors, subcontractors, brokers, agents and intermediaries' workplaces to ensure they comply with contractual obligations.</li> </ul> <p><b>Low and moderate risk projects:</b><br/>Borrower to:</p> <ul style="list-style-type: none"> <li>▪ Prescribe overtime rates and maximum overtime allowed.</li> <li>▪ Train MLJE (labour Department and Department of Factories Inspectorate), Ministry of Local Government Chieftaincy and Religious Affairs (MLGCRA)</li> </ul> |

| Requirements of ESS2 | National legislation and regulations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Gaps and differences between national legislation and ESS2                                                                                                                                                                                                                                                       | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                             |
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|                      | <p>the National Tripartite Committee.</p> <p>By law, the maximum working week is 48 hours, but collective bargaining has established a 40-hour workweek for most unionized workers.</p> <p>National Labour Act, 2003 (Act 651) provides special provisions relating to temporary workers and casual workers, including:</p> <ul style="list-style-type: none"> <li>▪ For casual workers that contract of employment does not need to be in writing, rights to equal pay, access to medical facilities, paid overtime, full remuneration for days of work.</li> <li>▪ Temporary workers, if employed by the same employer for a continuous period of six months, shall be treated as permanent workers and that same working conditions regarding minimum wage, hours of work, rest, paid public holidays, night work apply to temporary workers.</li> </ul> <p>Other legislation such as (i) Fair Wages and Salaries Commission Act, 2007 (Act 737); (ii) Workmen's Compensation Act, 1987 (187); (iii) Factories, Offices and Shops Act, 1970 (Act 328); (iv) Shipping Act, 2003 (No. 645); National Pensions Act, 2008 (Act 766) regulates the</p> | <p>inspection system, and has regional and decentralized officers that could be leveraged, and equipped to have a greater role both in scrutinizing and inspecting labor conditions in investment projects, and also in building capacity of SSSCs for monitoring working conditions in informal sector jobs</p> | <p>and Office of the Head of Local Government Service (OHLGS) to assess Labour and Working Conditions risks of projects as part of the ESA process.</p> <ul style="list-style-type: none"> <li>▪ Provide guidance and training to MLJE (labour Department and Department of Factories Inspectorate), MLGCRA and OHLGS on workplace inspections and contractor inspections for the project.</li> </ul> |

| Requirements of ESS2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | National legislation and regulations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Gaps and differences between national legislation and ESS2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | specific conditions of some sectors.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Non-discrimination and equal opportunity</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Employment of project workers will be based on the principle of equal opportunity and fair treatment. There will be no discrimination in recruitment, hiring, compensation, working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices (§13) measures to prevent and address harassment, intimidation and/or exploitation shall be established appropriate measures, including special measures of protection, assistance and remediation should be in place to address such situations (§14) and assistance to address vulnerabilities of project workers, including specific groups of workers, such as women, people with disabilities, migrant workers and children (of working age in accordance with ESS2) should be provided. | Protection from discrimination is a Constitutional right, which is further detailed in the (i) Labour Act, 2003 (Act 651) establishing rights to equal opportunity. The Labour Regulations, 2007 (L.I. 1833) spells out conditions of employment, organized labour, employment of persons with disability, occupational health and safety for workers, but the law is silent on special needs of women. The (ii) Affirmative Action (Gender Equality) Act, 2024 promotes gender equality and obliges public and private institutions to have a gender equity policy or plan; (iii) the Persons with Disabilities Act, 2006 (Act 715) protects from discrimination in the workplace on grounds of disability. Various other policies have been adopted to overcome structural inequality and deep-rooted exclusion patterns, including the (iv) National Workplace HIV/AIDS Policy, 2005 that provides protection from discrimination in the workplace to people living with HIV and AIDS; and the (v) National Youth Policy (NYP) 2022-2032 that promotes decent job creation, employability, and livelihood | <b>Non-discrimination and equal opportunity</b><br>Enforcement of equal opportunity and non-discrimination in labour and working conditions for all is weak in the formal sector, inter alia due to capacity and resource constraints across all levels to fulfill requirements for universal access to facilities despite provisions in the National Building Code and the National Disability Policy, 1996 and the Persons with Disabilities Act, 2006 (Act 715). There is weak enforcement of Youth Policy and youth are often victims of unfair termination of appointments, discrimination in employment, loss of jobs, unfair labour practices, and unresolved labour issues. While the Constitutional right to non-discrimination applies everywhere, the high share of labor force working in the informal sector limits enforcement of non-discrimination principles for informal sector workers that largely outside state with weakened labour rights coverage.<br><b>Protection from harassment</b><br>Measures to prevent and address harassment and/or exploitation are | <b>Substantial and High-risk Projects:</b><br>Borrower to:<br><ul style="list-style-type: none"> <li>Establish contractual documents with contractors and third parties (subcontractors, brokers, agents and intermediaries) that enable and oblige equal opportunity and fair treatment for women, youth over 15 years, people with disability, people living with HIV/AIDS and any other category of people, in contractual documents.</li> <li>Monitor compliance of contractors and third parties (subcontractors, brokers, agents and intermediaries) with equal opportunity and non-discrimination principles in recruitment and hiring, compensation, working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.</li> <li>Establish a GRM with special provisions for sensitive cases</li> </ul> |

| Requirements of ESS2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | National legislation and regulations                                                                                                                                                                                                                                                                                                                                                                                               | Gaps and differences between national legislation and ESS2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | empowerment for youth aged from 15 years and 35 years.                                                                                                                                                                                                                                                                                                                                                                             | <p>weak or lacking. There are no requirements and clear guidelines and procedures setting out measures to assess, prevent, and address sexual harassment, intimidation and/or sexual exploitation and abuse within the framework of the current ESA regime.</p> <p><b>Access to assistance</b><br/>The labour law and regulations have adequate provisions to safeguard vulnerable workers. However, weak regulatory enforcement may create room for some noncompliance. Informal workers operate largely outside state regulations, often working in vulnerable conditions.</p> | <p>for example harassment, sexual exploitation and abuse, exploitation of children, with appropriate referral procedures for remediation from specialized, mandated services / institutions.</p> <p><b>Low and moderate risk projects</b><br/>Borrower to:</p> <ul style="list-style-type: none"> <li>Provide training and other support to the Public Services Commission to monitor the implementation of their guidelines for human resource management in all public institutions involved in projects.</li> </ul> |
| <b>Worker's organizations</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| ESS2 establishes the obligation of the Borrower to allow workers to form and to join workers' organizations of their choosing, to bargain collectively without interference, and to respect the role of legally established workers' organizations and workers' representatives; not to restrict project workers from expressing their grievances and protect their rights; and to not seek to influence, control mechanisms for grievances, not discriminate or retaliate against project workers who participate, or seek to | <p>The Constitution of the Republic of Ghana (1992) establishes the freedom of association and workers are free to join and form unions.</p> <p>The Labour Act (No 651) of 2003 and Labour Regulations, 2007 (LI 1833) establish the rights to freedom of association, to collective bargaining and the right to strike. In accordance with these laws, workers are free to unionize and have access to collective bargaining.</p> | <p>Though workers are free to unionize and have access to collective bargaining by law, these rights face limitation in practice due to formalities which delay or substantially impair the free establishment of organisations. There are restrictions on trade unions' rights to establish branches, federation, and confederation or to affiliate with national and international organisations. Certain categories of workers are prohibited or limited from forming or joining a union or holding a</p>                                                                     | <p><b>Substantial and High-risk Projects:</b><br/>The borrower will</p> <ul style="list-style-type: none"> <li>Establish contractual documents with contractors and third parties (subcontractors, brokers, agents and intermediaries) defining the right to form and to join workers' organizations of their choosing, to bargain collectively without interference, and to respect the role of legally established workers' organizations and workers' representatives; not</li> </ul>                               |

| Requirements of ESS2                                                                                                                                                                                                                                                                                                                                             | National legislation and regulations                                                                                                                                                                                                                                                                                                                                                | Gaps and differences between national legislation and ESS2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| participate, in such workers' organizations and collective bargaining or alternative mechanisms.                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                     | union (e.g., armed forces, police, and other civil servants and public employees). Authorities' or employers have possibilities to prevent or end a strike, can discriminate in favour of non-strikers, and there is long list of "essential services" and "services of public utility" in which a minimum operational service can be imposed in the event of strikes. Penalties for violation of workers' rights are not defined by law. Though project workers are free to unionize and have access to collective bargaining under Ghanaian PLR, provision of and access to grievance redress mechanism is not consistent and varies depending on whether one is a permanent or casual or temporary worker, with the latter two categories less likely to have access. | to restrict project workers from expressing their grievances and protect their rights; and to not seek to influence, control mechanisms for grievances, not discriminate or retaliate against project workers who participate, or seek to participate, in such workers' organizations and collective bargaining.<br><ul style="list-style-type: none"> <li>Monitor compliance of contractors and third parties (subcontractors, brokers, agents and intermediaries) with those rights.</li> </ul> <b>Low and moderate risk projects</b><br>The borrower will<br><ul style="list-style-type: none"> <li>Train the National Labour Commission to monitor workers' rights.</li> </ul> |
| <b>Child labor and forced labor</b>                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| ESS2 establishes that no child under the age of 14 (unless national law specifies a higher age) will be employed or engaged in connection with the project (§17); and no child above the minimum age and under 18 will be employed or engaged in connection with the project. A child over the minimum age and under the age of 18 may be employed or engaged in | Over 40 laws exist in Ghana to protect children against child labour along with other forms of abuse. The use of child and forced labour is outlawed in <b>Constitution of Ghana (1992)</b> that establishes protection from child labor. <b>The Children's Act, 1998</b> (Act 560) prohibits engaging a child in exploitative labour, defined as labour depriving the child of its | While national legislation is in line with ILO Convention No. 138 on Minimum Age, there is divergence with the ESS2 which defines minimum age of 14 years for any work, unless national legislation is more stringent. Authorities do not enforce child labor laws effectively or consistently. Law enforcement officials, including judges, police,                                                                                                                                                                                                                                                                                                                                                                                                                     | The minimum age to engage a child on a project for work that constitutes "light work" will be 14 years, and 15 years for non-hazardous full-time employment. The minimum age for hazardous work will be 18 years.<br><b>Substantial and High-risk Projects:</b><br>Borrower to                                                                                                                                                                                                                                                                                                                                                                                                     |

| Requirements of ESS2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | National legislation and regulations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Gaps and differences between national legislation and ESS2                                                  | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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| <p>connection with the project unless an appropriate risk assessment is conducted prior to the work commencing; and unless the Borrower conducts regular monitoring of health, working conditions, hours of work and the other requirement of this ESS (§18). ESS2 furthermore establishes a minimum age of 18 years in connection with the project for any work that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development (§19).</p> | <p>health, education, or development and describing hazardous work. The Labour Act (2003) allows light work from 13 years, and full-time employment from 15 years and defines special conditions for the full-time employment of children from 15 years. The law prohibits hazardous labour for children under 18 years of age. The Ghana Hazardous Child Labour Activity Framework 2022 and adopted by MOLJE provides a detailed nationally defined, sector specific list of tasks that are considered light work authorized for children from 13 years and hazardous work for prohibited for persons under 18 years.</p> | <p>and labour officials, are sometimes unfamiliar with the provisions of the law that protect children.</p> | <ul style="list-style-type: none"> <li>▪ Establish contractual documents with contractors and third parties (subcontractors, brokers, agents and intermediaries) that define the minimum age for light work on a project from 14 years in line with Ghana Hazardous Child Labour Activity Framework; minimum age for full-time non-hazardous work, in line with Ghana Hazardous Child Labour Activity Framework from 15 years and a minimum age for hazardous work in line with the Ghana Hazardous Child Labour Activity Framework, to be of 18 years on the project.</li> <li>▪ Require contractors through contractual obligations to undertake a risk assessment of working conditions on worksites of the project and benchmark project activities and working conditions against the Ghana Hazardous Child Labour Activity Framework to define the work children can and cannot do in connection with the project.</li> <li>▪ Require contractors and third parties (subcontractors, brokers, agents and intermediaries) to sign a code</li> </ul> |

| Requirements of ESS2 | National legislation and regulations | Gaps and differences between national legislation and ESS2 | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|                      |                                      |                                                            | <p>of conduct to offer decent work for youth and fight against child labor.</p> <ul style="list-style-type: none"> <li>Conduct regular monitoring of health and working conditions on all project sites.</li> </ul> <p><b>Low and medium risk projects</b></p> <p>Borrower to</p> <ul style="list-style-type: none"> <li>Establish contractual documents with contractors and third parties (subcontractors, brokers, agents and intermediaries) that define the minimum age for light work on a project from 14 years in line with Ghana Hazardous Child Labour Activity Framework; minimum age for full-time non-hazardous work, in line with Ghana Hazardous Child Labour Activity Framework from 15 years and a minimum age for hazardous work in line with the Ghana Hazardous Child Labour Activity Framework, to be of 18 years on the project.</li> <li>Undertake appropriate risk assessment of worksites and working conditions prior to commencing work.</li> <li>Require contractors and third parties (subcontractors, brokers, agents and intermediaries) to sign a code</li> </ul> |

| Requirements of ESS2                                                                                                                                                                                                                                                                                                                                                                             | National legislation and regulations                                                                                                                                                                                                                                                                                                                                                                                                                              | Gaps and differences between national legislation and ESS2                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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|                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <p>of conduct to offer decent work for youth and fight against child labor.</p> <ul style="list-style-type: none"> <li>Support the operational capacity building and training of Metropolitan Municipal and District Assemblies (MMDAs), including social services subcommittees, district planning coordinating units, local planning officers, labor officers and social welfare officers of the District Departments of Social Welfare and Community Development (DDSWCD), in inspection of project worksites and remediation of child labor and child abuse cases in connection to a project.</li> </ul> |
| ESS2 prohibits forced labor, which consists of any work or service not voluntarily performed that is exacted by an individual under threat of force or penalty is prohibited in connection with the project (§20). This prohibition covers trafficking cases and any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. | <p>The Labour Act (2003) prohibits all forms of forced or compulsory labour.</p> <p><b>The Human Trafficking Act</b> of 2005 criminalizes recruitment, transportation, transfer, harboring, trading, or receipt of persons, within and across borders, using threat, fraud, and exploitation of a vulnerability or by paying to gain consent. It induced prostitution and other forms of sexual exploitation, forced labour, slavery or the removal of organs</p> | <p>Enforcement of laws on the prohibition of forced labour affecting both children and adults is weak in several sectors, especially in the informal economy (fishing sector, informal mining, agriculture, domestic labour, portage, begging, herding, quarrying, and hawking) due to weak human resource and operational capacity of the labor inspection system and MMDAs to undertake monitoring of labor conditions in the informal sector. Limited capacity to identify and remediate cases of child and</p> | <p>Classify all projects that will recruit workforce from sectors that largely operate in the informal sector, as substantial or high-risk projects depending on the nature of activities and geographic areas of intervention.</p> <p><b>Substantial and High-risk Projects:</b></p> <p>Borrower to:</p> <ul style="list-style-type: none"> <li>Establish contractual documents with contractors and third parties (subcontractors, brokers, agents and intermediaries) that prohibit forced labor.</li> </ul>                                                                                              |

| Requirements of ESS2 | National legislation and regulations | Gaps and differences between national legislation and ESS2                                                                                                                                                       | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|                      |                                      | <p>forced labor means that significant risks of such remain, especially for investments in the informal sector, in sectors requiring a lot of manual labor, or in sectors where family labor is widely used.</p> | <ul style="list-style-type: none"> <li>Require contractors and third parties (subcontractors, brokers, agents and intermediaries) to sign a code of conduct that defines forced labor risk in the sector and vows to fight against forced labor.</li> <li>Conduct regular monitoring of health and working conditions in all project sites.</li> </ul> <p><b>Low and medium risk projects</b><br/>Borrower to:</p> <ul style="list-style-type: none"> <li>Establish contractual documents with contractors and third parties (subcontractors, brokers, agents and intermediaries) that prohibit forced labor.</li> <li>Require contractors and third parties (subcontractors, brokers, agents and intermediaries) to sign a code of conduct that defines forced labor risk in the sector and vows to fight against forced labor.</li> <li>Support the operational capacity building and training of MMDAs, including social services subcommittees, district planning coordinating units, local planning officers, labor officers and social welfare officers of the DDSWCD, in inspection of</li> </ul> |

| Requirements of ESS2                                                                                                                                                                                                                                                                                                                            | National legislation and regulations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Gaps and differences between national legislation and ESS2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| <b>Grievance mechanism for workers</b>                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| A grievance mechanism will be provided for all direct workers and contracted workers where it is possible to raise workplace concerns (§21) that is proportionate to the nature, scale and potential risk and impact (§22) and that does not impede access to judicial, administrative remedies or other existing arbitration procedures (§23). | For workplace concerns the Labour Act (Act 651) of 2003 mandates the National Labour Commission (NLC) supported by LI 1833, to ensure compliance with labour regulations, including to settle industrial disputes, investigates labor complaints, and promote effective labor cooperation. If settlement fails, the commission can appoint a mediator; if that is unsuccessful, an arbitration panel can be presented, with the consent of the two parties involved. NLC has the power of a High Court concerning the enforcement of the attendance of witnesses and the production of documents.<br>Under the Courts Act (Act 459) of 1993 and the Alternative Dispute Resolution Act (Act 798) of 2010, the courts can propose amicable settlement of disputes among litigants. Arbitration is the preferred approach for resolving such disputes. Large commercial disputes are usually commenced in the Commercial Division of the High Court. Its jurisdiction covers all commercial disputes related to | The law and regulations have adequate provisions for resolution of worker grievances, including resort to the National Labour Commission, however in practice labor disputes often remain unresolved due to poor documentation / availability of written contracts. Many unions do not follow approved processes for dealing with disputes, allegedly due to the perceived unfair and one-sided application of the law against the unions. The process is often long and cumbersome, with employers generally acting when unions threaten to withdraw their services or declare a strike. Access to these grievance redress processes vary depending on the type and category of worker, whether or not they are unionized. | <b>Substantial and High-risk Projects:</b><br>Borrower to:<br><ul style="list-style-type: none"> <li>Establish a Project Worker GRM with a clearly defined typology of potential grievances and how these should be responded to/remediated, including through collaboration with other mandated institutions for sensitive and high-risk cases.</li> </ul> <b>Low and medium risk projects</b> <ul style="list-style-type: none"> <li>Borrower to establish collaboration procedures, refer to and build capacity (as needed) of the NLC, or the Commission on Human Rights and Administrative Justice (CHRAJ) and of MMDAs to receive, investigate and respond to labor complaints on the projects.</li> </ul> |

| Requirements of ESS2 | National legislation and regulations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Gaps and differences between national legislation and ESS2 | Measures to overcome gaps and differences |
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|                      | <p>oil and gas, insurance, banking, business agency, intellectual property rights, tax, retail fraud, applications under the Companies Act (Act 179) of 1963 and any other claims of a commercial nature. Labour matters are heard by specialised courts created to handle these disputes.</p> <p>The Commission on Human Rights and Administrative Justice Act (Act 456) of 1993 offers an independent grievance mechanism in cases of violations of fundamental rights and freedoms established by the Constitution (e.g. forced labor, trafficking and child labor).</p> <p>Labour Act (2003) guides all labour related matters and defines child labor. These are implemented by labor officers and social welfare officers at District Departments of Social Welfare and Community Development, local government service officers that report to MMDAs. Important pieces of legislation and standards for social risk management and policy implementation include the Children's Act, 1998 (Act 560) that defines statutory mandates, institutions, and the Inter-Sectoral Standard Operating Procedures for Child Protection and Family Welfare, provides guidelines, tools</p> |                                                            |                                           |

| Requirements of ESS2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | National legislation and regulations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Gaps and differences between national legislation and ESS2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | and forms for case work and management.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Occupational Health and Safety (OHS)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| OHS measures will be appropriate and industry specific (§24), designed and implemented to identify hazards, prevent hazards, ensure training of project workers and maintain records on training document and report accidents, diseases and incidents, ensure emergency prevention, preparedness and response, and remediate occupational injuries, deaths, disability and disease (§25). This shall apply to all parties who employ or engage project workers, and the provision of personal protective equipment shall be without expense to the project workers (§26). Project workers shall have access to workplace processes where they can report work situations that they believe are not safe or healthy (§27). They should be provided with facilities appropriate to the circumstances of their work, including access to canteens, hygiene facilities, and appropriate areas for rest and where accommodation services are provided to project workers, policies will be put in place and implemented on the management and quality of accommodation to | Factories, Offices and Shops Act, 1979 (Act 328) defines occupational health and safety standards for factories, offices, and shops (excluding other workplaces)<br>The Workmen's Compensation Law 1987 (PNDC 187) relates to compensation for personal injuries caused by accidents at work and hence, indirectly impacts on monitoring worker and workplace safety. The Radiation Protection Board of the Ghana Atomic Energy Commission also regulates companies with radiation exposure hazards.<br><b>The Shipping Act</b> (No. 645) of 2003 regulates seafarers concerning crew occupational safety and health, required provisions and water on board, and protection of seafarers from imposition and relief and repatriation. | Ghana does not have an explicit and comprehensive national policy and law on OHS. There are industry-specific occupational safety and health regulations, and these are fragmented and limited in scope. Employers and employees therefore lack clear guidelines and expectations for maintaining safe workplaces, leading to varied interpretations and practices. There are furthermore inadequate guidelines for the assessment, management and monitoring of OHS conditions. This legislation covers only workers in the formal sector and national legislation does not cover informal workers. | <b>All projects (low, medium, substantial and high-risk projects):</b><br>Borrower to:<br><ul style="list-style-type: none"> <li>• Develop an OHS policy</li> <li>• Develop OHS inspection tools</li> <li>• Undertake documentation and reporting of occupational accidents, diseases and incidents.</li> <li>• Establish contractual documents with contractors that require contractors and third parties (subcontractors, brokers, agents and intermediaries) to have a robust enforcement mechanism of OHS standards and safeguard worker safety, including <ul style="list-style-type: none"> <li>- Identify potential hazards to project workers.</li> <li>- Based on potential hazards, define preventive and protective measures and train project workers on OHS-measures.</li> <li>- Define OHS standards and implementation guidelines for workplaces.</li> </ul> </li> </ul> |

| Requirements of ESS2                                                                                                                                                                                                                                                                                                                                                                                  | National legislation and regulations                                                                                                | Gaps and differences between national legislation and ESS2                                                                                                                                                                                                                                                                                          | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <p>protect and promote the health, safety, and well-being of project workers (§28).</p> <p>A system for regular review of occupational safety and health performance and the working environment will be put in place and include identification of safety and health hazards and risks (§30).</p>                                                                                                    |                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                     | <ul style="list-style-type: none"> <li>- Assign a person responsible for OHS and define tools, procedures and routines for OHS workplace monitoring (when where and by whom)</li> <li>- Undertake documentation and reporting of occupational accidents, diseases and incidents.</li> <li>- Have emergency prevention and preparedness and response arrangements in place to respond to emergency situations</li> <li>- Have remediation protocols pre-defined for eventual adverse impacts such as occupational injuries, deaths, disability and disease.</li> <li>- Ensure budget for implementation of these routines</li> </ul> |
| <b>Contracted workers</b>                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p>Borrower to ascertain that third parties are legitimate and reliable entities and have labor management procedures in place for the project, in line with ESS2 (§31) and to establish procedures for managing and monitoring the performance of third parties (§32) and to ensure workers have access to a grievance mechanism (of third party or project's worker grievance mechanism) (§33).</p> | <p>The Labour Act 2003 does not exclude any employer from the above obligations, if the employer operates in the formal sector.</p> | <p>Labor-related legal framework covers the formal sector and regulation for informal sector workers, e.g., community workers missing.</p> <p>Occupational Health and Safety Standards are not comprehensive for all sectors and depending of sector guidelines for the assessment, management and monitoring of OHS conditions may be limited.</p> | <p><b>Substantial and High-risk Projects:</b></p> <p>Borrower to :</p> <ul style="list-style-type: none"> <li>▪ Prescribe the working conditions for contracted workers in labor contracts.</li> <li>▪ Define occupational health and safety standards and guidelines for their monitoring, depending of sector.</li> <li>▪ Inspect that defined working conditions are upheld.</li> </ul>                                                                                                                                                                                                                                          |

| Requirements of ESS2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | National legislation and regulations                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Gaps and differences between national legislation and ESS2                                                                                                                                                    | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| <b>Community workers</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| ESS2 requires community work to be provided on a voluntary basis as an outcome of individual or community agreement. Work to be provided voluntarily (§34), that the relevant provisions of this ESS2 are applied proportionate to the scope and nature of community work, and level of risk (§35) and that the conditions for the mobilization of community workers, including the amount of their remuneration and the terms of payment as well as working hours are integrated in the LMP (§36) and that a grievance and redress mechanism is developed for community workers. | The Labour Act (2003) prohibits all forms of forced or compulsory labor, and the same Act, as well as the Children's Act (1998) prohibit child labor. <b>The Human Trafficking Act (2005)</b> criminalizes recruitment, transportation, transfer, harboring, trading, or receipt of persons, within and across borders, using threat, fraud, and exploitation of a vulnerability or by paying to gain consent. The constitutional right to unionize covers all categories of workers. | In addition to the ESS2 requirements, Ghana provides a constitutional right to unionize to all categories of workers, thereby giving access to unions grievance processes in the cases workers are unionized. | <p><b>Substantial and High-risk Projects:</b><br/>Borrower to :</p> <ul style="list-style-type: none"> <li>▪ Prescribe the working conditions for community workers in written agreements.</li> <li>▪ Inspect that defined working conditions are upheld.</li> <li>▪ Assess Child Labor, Forced labor, trafficking and Occupational Health and Safety risks linked to community labor prior to beginning recruitment for such work.</li> <li>▪ Set up, ensure access to and publicize a GRM for community workers.</li> </ul> <p><b>Low and moderate risk projects:</b><br/>Borrower to:</p> |

| Requirements of ESS2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | National legislation and regulations                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Gaps and differences between national legislation and ESS2                                                                                                                                                    | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                               | <ul style="list-style-type: none"> <li>Prescribe the working conditions for community workers in written agreements.</li> <li>Train trainers from MOLJE and OHLGS and equip MMDAs to inspect working conditions for community workers, to assess Child Labor, Forced labor, trafficking and Occupational Health and Safety risks linked to community labor prior to beginning recruitment for such work.</li> <li>Train trainers from MOLJE and OHLGS and equip MMDAs to run and manage grievance cases from community labor.</li> </ul>              |
| <b>Primary supply workers</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Prevention of Child and Forced Labor – Ensuring that suppliers do not engage in exploitative labor practices (§20-26); Safe and Healthy Working Conditions – Suppliers must provide a safe work environment that meets occupational health and safety standards (§43-48); Fair Wages and Working Hours – Workers should receive fair compensation and reasonable working hours (§36); Grievance Mechanism – Workers must have access to a system for reporting concerns and resolving disputes (§47-48); Monitoring and Compliance – Borrowers must assess risks related to primary | <p>The Labour Act (2003) prohibits all forms of forced or compulsory labor, and the same Act, as well as the Children’s Act (1998) prohibit child labor.</p> <p><b>The Human Trafficking Act</b> (2005) criminalizes recruitment, transportation, transfer, harboring, trading, or receipt of persons, within and across borders, using threat, fraud, and exploitation of a vulnerability or by paying to gain consent.</p> <p>The constitutional right to unionize covers all categories of workers.</p> | In addition to the ESS2 requirements, Ghana provides a constitutional right to unionize to all categories of workers, thereby giving access to unions grievance processes in the cases workers are unionized. | <p><b>Substantial and High-risk Projects:</b></p> <p>Borrower to ensure contractual documents with suppliers of essential materials and goods to the project that define</p> <ul style="list-style-type: none"> <li>A prohibition of the use of child labor and forced labor in the production of goods and materials supplied to the project,</li> <li>Requirements of suppliers to provide their workers with safe work environment with clearly defined occupational health and safety standards for their workers, and with procedures</li> </ul> |

| Requirements of ESS2                                                            | National legislation and regulations | Gaps and differences between national legislation and ESS2 | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| supply workers and take corrective actions if violations occur (§20-26, 43-48). |                                      |                                                            | <p>in place to monitor working conditions of workers producing goods and materials to the project</p> <ul style="list-style-type: none"> <li>• Obligation to provide workers of primary suppliers with contractual documents describing the working conditions, including salary and working hours, in writing <ul style="list-style-type: none"> <li>▪ A well-publicized office, person or other mechanism, where grievances cases can be reported as well as a well-publicized description of the LMP grievance structures where workers can report cases if they prefer to not go through their own workplace.</li> <li>▪ Inspect that contractual obligations are upheld on a regular basis.</li> </ul> </li> </ul> <p><b>Low and moderate risk projects:</b><br/>Borrower to ensure contractual documents with suppliers of essential materials and goods to the project that define</p> <ul style="list-style-type: none"> <li>▪ A prohibition of the use of child labor and forced labor in the production of goods and materials supplied to the project,</li> <li>▪ Requirements of suppliers to provide their workers with safe work environment with clearly</li> </ul> |

| Requirements of ESS2 | National legislation and regulations | Gaps and differences between national legislation and ESS2 | Measures to overcome gaps and differences                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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|                      |                                      |                                                            | <p>defined occupational health and safety standards for their workers, and with procedures in place to monitor working conditions of workers producing goods and materials to the project</p> <ul style="list-style-type: none"> <li>▪ Obligation to provide workers of primary suppliers with contractual documents describing the working conditions, including salary and working hours, in writing</li> <li>▪ A well-publicized office, person or other mechanism, where grievances cases can be reported as well as a well-publicized description of the LMP grievance structures where workers can report cases if they prefer to not go through their own workplace.</li> <li>▪ Train trainers from MLJE and OHLGS and equip MMDAs to inspect working conditions, occupational health and safety, that there is no use of child labor or forced labor in the production of materials and goods supplied to the project.</li> </ul> |

## Annex 2: Code of Conduct for Contracted Companies

This Code of Conduct for Contracted Companies on basic labour conditions and human rights (hereafter referred to as “Code”) represents the commitment of [Company name] to fundamental standards that make [Company name] the right place to work.

[Company name] prides its employees as its most vital asset. The individual and collective contributions of [Company name] people at all levels are essential to the success of the company.

In recognition of this, [Company name] has developed policies and practices designed to ensure that employees enjoy the protection afforded by the concepts set forth in this Code.

[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 [Company name] policies and practices described in the Labour Management Procedure (LMP) prepared for the project. These reflect labour and human rights standards from the International Labour Organization, the Universal Declaration of Human Rights, Ghanaian Labour law and the World Bank Environmental and Social Standard 2 (ESS2) on Labour and Working Conditions.

### **Non-Discrimination and Equal Opportunity**

It is the policy of [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.

### **Prevention of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)**

[Company name] upholds a zero-tolerance policy on behaviors that constitute sexual exploitation, abuse, and sexual harassment. [Company name] will ensure that all employees are informed about this policy, that reporting is enabled through a grievance mechanism, whistleblowers are given full protection, and that disciplinary action is enforced in case of misconduct.

### **Freedom of Association**

[Company name] recognizes and respects the legal rights of the employee to join or to refrain from joining any lawful organization of their own choosing. [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 [Company name] and its employees and the employees are best served through a favourable, collective work environment, with direct communication between employees and management.

## **Occupational, Health and Safety (OHS) and Environmental Protection**

[Company name] is 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 with:

- 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 OHS, Environmental Protection 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 ensure 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**

[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**

[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.

## **Child Labour**

By signing this Code of Conduct, [Company name] confirms that it has informed itself of:

- Risks related to child labour in the economic sector in which it is active.
- Legal standards for the work of children who have reached the minimum age for light work (14 years old) and who have reached the minimum age for employment (15 years old).
- Legal standards relating to the prohibition of hazardous work for children below 18 years
- Legal standards related to the prohibition of forced labour and trafficking.

To minimize the risk of child labour *[Company name]* will:

- Respect the minimum age for work in accordance with the projects Labor Management Procedure.
- Carry out a verification of the age of the workers.
- Keep a register of workers with names, dates of birth or their apparent ages.
- Establish a policy and code of good conduct for the protection of children at work.
- Establish a plan to monitor that no child is involved in work that can be defined as child labour because it is exploitative in nature or hazardous.
- Establish a list with identifying information, such as name, age for workers under 18 years.
- Informed from the Ghana Hazardous Child Labour Activity Framework, establish a workplace list that defines the tasks prohibited for children under 18 years.
- Appoint a person responsible for monitoring working conditions for children under 18 years.
- Establish an occupational health and safety policy and plan that defines the procedures for replacing a sick or injured worker that ensures that children do not replace adults for dangerous tasks.
- Develop an awareness and training schedule given the various work risks, including child labour. This training must cover the working conditions of young workers.
- Record and report all suspected cases of suspected child labour in connection to or as unintended impact of project activities.
- Seek informed and written consent from parents or primary care givers before engaging a child above the legal age for work, in work.
- Only let work of a child begin after an appropriate risk assessment has been done at the workplace prior .
- Only let the work of a child begin after a medical practitioner has certified that the young person is in good health and is medically fit for work.

#### **Slavery, Human Trafficking, Forced Labor**

Employment and work for *[Company name]* shall be voluntary, and the terms of employment must be communicated to workers in writing and comply with applicable laws and regulations. All work or service exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily is prohibited. Children can be considered coerced / forced to work, even if they have given their consent, depending on the circumstances under which the child was recruited.

*[Company name]* informs its employees, contractors and vendors about this Code. We encourage our contractors and vendors to adopt and enforce Codes with similar contents covered. Employees who believe there may have been a violation of this Code report it through confidentially established channels. *[Company name]* may conduct assessments, as needed, to measure compliance. *[Company name]* will periodically review this Code to determine whether revisions are appropriate.

The purpose of this Code is to maintain zero tolerance for exploitative and hazardous child labour, slavery, human trafficking, forced labour. The policy on human trafficking applies to all its employees as well as to any persons whose functions are related to [Company name].

Employees of [Company name] and Contractors whose functions relate to [Company name] operations shall not:

- Use forced labour in the performance of any work,
- Engage in human trafficking,
- Engage in commercial sex acts,
- Deny employees access to his/her immigration documents such as passports, driving license, etc.,
- Use misleading recruitment practices,
- Use recruiters that do not comply with Labour Laws of Ghana 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, [Company name] may take action against the violating employee or contractor to include termination of contract.

#### **Expectations For Our Sub-contractors / Suppliers/ Workers**

[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 subcontractors and / or suppliers, including our consultants and contract labour, are defined by contracts, which are based on lawful, ethical, fair, and efficient practices.

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

Having read, and discussed ineptly, the above [Company name] signs this Code of Conduct on the [Date: DD/MM/YYYY],

I [Name], as an employee or contractor of [Company name], hereby certify that I have read, noted and adhere to abide by the Code of Conduct of [Company name]

Code of Conduct [Date: DD/MM/YYYY]

## Annex 3: Code of Conduct for Employees

### Introduction

At [Company Name] our employees are our most valuable asset. This Code of Conduct outlines your rights as an employee and the responsibilities you commit to when working with us. By signing this document, you acknowledge and uphold these principles to promote a respectful, fair, and safe workplace.

### Your Rights as an Employee

#### Non-Discrimination & Equal Opportunity

You have the right to work in an environment free from discrimination or harassment. Employment decisions—including hiring, promotions, and compensation—are based on merit, regardless of race, gender, age, disability, or other personal characteristics. If you experience discrimination, you have the right to report it confidentially.

#### Freedom of Association

You have the legal right to join or refrain from joining any trade union or employee association of your choice. The company respects this right and ensures a workplace where your voice is heard.

#### Fair Compensation & Work Conditions

You are entitled to fair pay, reasonable working hours, and a safe, healthy work environment. Your wages and benefits as communicated in your contract, comply with national labor laws and industry standards. You have a right to ask questions about your compensation and work conditions and raise concerns without fear of retaliation against you.

#### Safe & Healthy Workplace

Your health and safety matter. The company is committed to preventing workplace hazards, providing proper training, and ensuring a clean working environment. If you notice unsafe conditions, you have the right to report them.

#### Protection Against Forced Labor & Child Labor

[Company Name] strictly prohibits forced labor, child labor, and human trafficking. If you suspect violations related to these, report them immediately through established company, project, national or World Bank channels.

### Your Responsibilities as an Employee

As an employee of [Company Name] your professional and private behaviour reflects on the company image. As such employees are expected to act in a way so as to uphold the company's good reputation and standing in the community/society where it operates. As an employee, you are therefore expected to show:

#### Respect for Colleagues & Workplace Ethics

Treat colleagues, customers, and partners with respect and professionalism. Discrimination, harassment, and bullying are unacceptable. Be mindful of your language, actions, and attitudes toward others.

#### Commitment to Workplace Safety

Follow all the health and safety guidelines provided to you by the company. Use protective equipment when required and report any hazards or accidents promptly.

Zero Tolerance for Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)

Sexual exploitation and abuse and sexual harassment are strictly prohibited in the workplace as outside of the workplace. Employees must avoid such inappropriate behavior at all times and should report suspected incidents through the confidential grievance mechanism of the company, the grievance mechanism of the project, a national reporting mechanism or the World Bank grievance services, whichever channel the employee is the most comfortable with.

Environmental Responsibility

Be mindful of workplace sustainability. Reduce waste, use company resources responsibly, and follow environmental safety protocols.

Workplace Integrity & Confidentiality

Maintain honesty and transparency in your work. Do not misuse company information or engage in dishonest practices. If handling sensitive data, ensure confidentiality and follow company policies.

Commitment to Ethical Employment Practices

Ensure that all work performed under company operations aligns with labor laws. Do not engage in fraudulent activities, forced labor, or unethical recruitment practices.

Reporting Concerns

If you witness violations of this Code, report them through company-designated confidential channels. The company ensures whistleblower protection, meaning reports are handled securely, and employees will not face retaliation. Should you have any concerns regarding workplace grievance mechanism, you are free to choose to report to any other mechanism, such as the grievance mechanism of the project, a national reporting mechanism or the World Bank grievance services<sup>9</sup>, whichever channel you feel the most comfortable with.

**Acknowledgment & Agreement**

By signing below, I acknowledge that I have read and understood this Code of Conduct for Employees. I agree to uphold these principles in my role at [Company Name].

Employee signature:

Employee name:

Date: [DD/MM/YYYY]

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<sup>9</sup> <https://wbgcmsprod.microsoftcrmportals.com/en-US/anonymous-users/int-fraud-management/create-new-complaint/>

## Annex 4: Parental authorization for child work between 14 and 15 years for light work.

The work of a child under the age of 18 is done with parental authorization.

Submit this application, completed and signed, to the employer / the person who organizes the work of the child before the start of the work.

### Legal information:

Children from the age of 14 can undertake light work and engage in economic activities such as for example in the family business, and under certain conditions, e.g., to earn a little pocket money outside of school hours or during school holidays but cannot be employed under a labor contract.

Light work should be undertaken under the supervision of an adult, for the purposes of education and social integration of the child.

Light work undertaken by a child aged at least 14 years should not jeopardize the health or physical, mental, moral or social development of the child.

The work should not compromise the school attendance and participation of the child such as the child's possibility to do homework, prepare for tests and benefit fully from education.

The work should not take place at night-time that is before 6 AM or after 8 PM or during regular school-hours.

Although national legislation does not prescribe specific maximum hours that children can perform economic activities that are light work, the daily working time of actual work should not exceed 2 hours for a school day and 4 hours for a non-school day.

For children aged at least 14 and below 15 years, the effective weekly working time should not exceed 12 hours for a school week and 14 hours for a non-school week.

None of the tasks undertaken should be hazardous tasks

I, undersigned, confirm that I have been informed of the legal conditions for engaging my child in light work (see above) and that I have understood that there is a grievance mechanism established to which I can refer, should I not be satisfied with the conditions of work or work situation of my child.

I authorize my child / the child under my parental responsibility to carry out light work:

Child's first and last name: [Name], Date of birth: [DD/MM/YYYY],

Address: [Address], [Location]

Name of company organizing the work: [Name], [Address], [Location].

Period during which child will be engaged in work: from [DD/MM/YYYY] to [DD/MM/YYYY]

Name and signature of person with parental responsibility: [Name], [Signature]

## Annex 5 – Parental authorization for the employment of a child between 15 years and 18 years

The work of a child under the age of 18 is done with parental authorization.

Submit this application, completed and signed, to the employer / the person who organizes the work of the child before the start of the work.

### Legal information:

Children can, from the age of 15, be employed to perform work, provided that

- The child is no longer in compulsory education
- The work is not hazardous or likely to compromise the child's health and wellbeing
- Under condition that a medical practitioner has certified that the young person is in good health and is medically fit for work.
- A child's work is logged with the employer with name and dates of birth
- The child's age has been verified
- The child is given weekly and yearly rest periods (holidays) to the same extent as any person over 18 years
- The work does not exceed 8 hours of work per day and 43 hours per week if the work is light and if the work takes place in heavy manual work occupations the work should not exceed 4 hours per day and 25 hours per week
- The work does not take place at night-time, that is before 6 AM and after 8 PM.

I, undersigned, confirm that I have been informed of the legal conditions for employment of my child and that I have understood that there is a grievance mechanism established to which I can refer, should I not be satisfied with the conditions of work or work situation of my child.

I authorize my child / the child under my parental responsibility to be employed

Child's first and last name: [Name], Date of birth: [DD/MM/YYYY],

Address: [Address], [Location]

Name of company organizing the work: [Name], [Address], [Location].

Period during which child will be engaged in work: from [DD/MM/YYYY] to [DD/MM/YYYY]

Name and signature of person with parental responsibility: [Name], [Signature]

## Annex 6: Worker Grievance Submission Form

The complaint concerns (Add company name): \_\_\_\_\_

### Section 1: Personal Details (Optional)

Complainants Full Name: \_\_\_\_\_

Employee ID (if applicable): \_\_\_\_\_

Department / Worksite: \_\_\_\_\_

Contact Information: \_\_\_\_\_

Preferred Method of Contact:

☐ Email ☐ Phone ☐ In-Person ☐ Anonymous Submission

### Section 2: Affected person

I am submitting this complaint on behalf of

☐ Myself ☐ Somebody else

If somebody else, affected persons' full name: \_\_\_\_\_

### Section 3: Type of Grievance

Category: Workplace Issue

- ☐ Workplace misunderstandings or conflicts
- ☐ Scheduling issues or shift concerns
- ☐ Lack of resources (tools, equipment, workspace)
- ☐ Minor administrative concerns (payroll delays without financial harm)
- ☐ Other, please describe \_\_\_\_\_

Category: Labor Rights & Workplace Safety Concerns

- ☐ Unfair treatment (bias in promotions, wage disparities, favoritism)
- ☐ Harassment (non-sexual), such as bullying, verbal abuse, intimidation
- ☐ Workplace health & safety concerns (hazardous conditions, lack of equipment)
- ☐ Failure to comply with contract terms (benefits, overtime pay disputes)
- ☐ Other, please describe \_\_\_\_\_

Category: Legal & Ethical Violations

- ☐ Sexual harassment, exploitation, or abuse

- ☐ Workplace discrimination (race, gender, disability, etc.)
- ☐ Forced labor, human trafficking, or exploitative working conditions
- ☐ Child labor involvement or violations
- ☐ Serious safety risks (negligence leading to injuries or fatalities)
- ☐ Retaliation against whistleblowers
- ☐ Other, please describe \_\_\_\_\_

#### Section 4: Grievance Description

Please describe the complaint in detail, including dates, locations, individuals involved, and any evidence, if available

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#### Section 5: Desired Resolution

How would you like the company to address this issue? Tick all that apply

- ☐ Direct resolution through mediation
- ☐ Formal investigation and disciplinary action
- ☐ Workplace improvement measures
- ☐ Policy change or management intervention
- ☐ Other (please specify): \_\_\_\_\_

#### Section 6: Confidentiality Preference

- ☐ I wish to remain anonymous
- ☐ I allow human resources or management to know my identity
- ☐ I require full protection from retaliation

#### Section 7: Supporting Documents (Optional)

- ☐ Witness statements
- ☐ Photos / screenshots
- ☐ Email / message records
- ☐ Other: \_\_\_\_\_

**Section 8: Acknowledgment & Signature**

By signing below, I confirm that the information provided is accurate and submitted in good faith.

Employee Signature (Optional): \_\_\_\_\_

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

**This box is to be filled by the Grievance Mechanism.**

Received By (Name of Grievance Officer): \_\_\_\_\_

Resolution Timeline (To be filled by HR/Management): \_\_\_\_ / \_\_\_\_ / \_\_\_\_

**Classification of case based on Severity Category (Tick One)**

- ☐ Light Case (Minor Workplace Issues)
- ☐ Moderate Case (Labor Rights & Workplace Safety Concerns)
- ☐ Severe Case (Legal & Ethical Violations)

## Annex 7: Worker Grievance Corrective Action Plan Form

This form is designed for submission into a central grievance record after assessment and response formulation.

Case Number: \_\_\_\_\_

Date of Submission: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Grievance Officer Handling Case: \_\_\_\_\_

### Section 1: Case Assessment Findings

Category of Grievance:

- ☐ Workplace Issue
- ☐ Labor Rights & Workplace Safety Concerns
- ☐ Legal & Ethical Violations

Summary of Grievance:

(Brief description of the reported issue, including comment on category and severity)

\_\_\_\_\_

Findings from Assessment:

(Details of investigation, including evidence reviewed, witness statements, and conclusions)

\_\_\_\_\_

### Section 2: Proposed Resolution

Resolution Type: (Tick all that apply)

- ☐ Mediation between parties involved
- ☐ Formal disciplinary action
- ☐ Workplace improvement measures
- ☐ Policy revision or management intervention
- ☐ Compensation or corrective benefits
- ☐ Other (please specify): \_\_\_\_\_

Justification for Resolution:

(Explanation of why this resolution was chosen)

\_\_\_\_\_

### Section 3: Implementation Plan

Action Steps:

(Outline of corrective actions to be taken)

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Responsible Parties:

(Names of individuals or departments responsible for implementation)

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Timeframe for Completion:

- ☐ Immediate (within 7 days)
- ☐ Short-term (within 30 days)
- ☐ Medium-term (within 3 months)
- ☐ Long-term (beyond 3 months)

### Section 4: Monitoring & Follow-Up

Follow-Up Actions Required:

- ☐ Periodic review of workplace conditions
- ☐ Employee feedback collection
- ☐ Additional training or awareness programs
- ☐ Other (please specify): \_\_\_\_\_

Review Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Final Approval by: \_\_\_\_\_

## Annex 8: Grievance Case Closure Form

This form is designed for submission into a central grievance record when a grievance case is closed

Case Number: \_\_\_\_\_

Date of Closure: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Grievance Officer Handling Case \_\_\_\_\_

### Section 1: Case Summary

Original Grievance Report Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Category of Grievance:

- ☐ Workplace Issue
- ☐ Labor Rights & Workplace Safety Concerns
- ☐ Legal & Ethical Violations

Summary of Complaint:

(Brief description of the reported issue)

### Section 2: Resolution Details

Resolution Implemented:

- ☐ Mediation between parties involved
- ☐ Formal disciplinary action
- ☐ Workplace improvement measures
- ☐ Policy revision or management intervention
- ☐ Compensation or corrective benefits
- ☐ Other (please specify): \_\_\_\_\_

Date Resolution Was Implemented: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Outcome of Resolution:

(Describe the final outcome, including whether the grievance was fully resolved, partially resolved, or unresolved)

### Section 3: Employee Feedback & Satisfaction

Was the complainant satisfied with the resolution?

☐ Yes

☐ No

☐ Partially

**Section 4: Final Review & Approval**

Follow-Up Actions Required:

☐ No further action needed

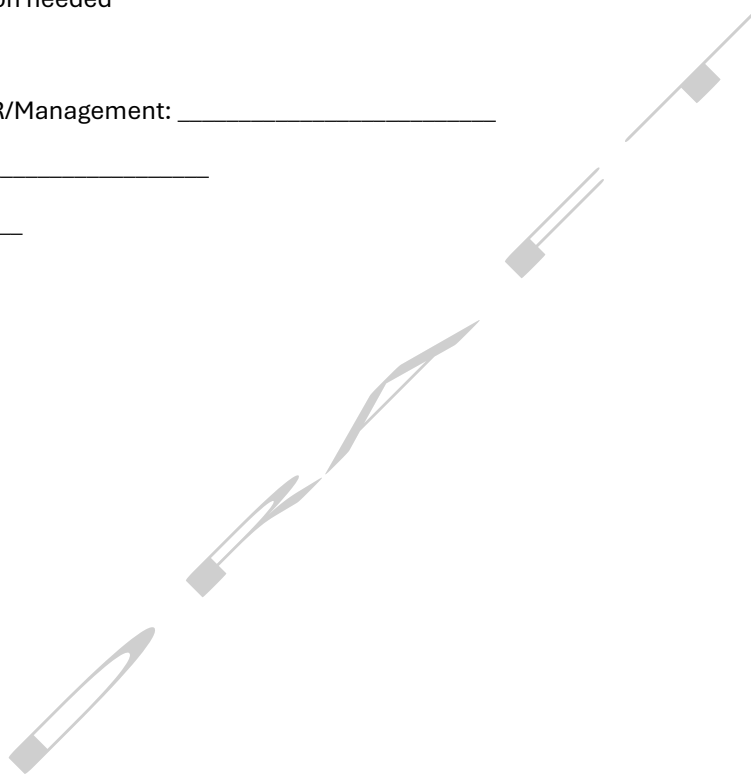
☐ Additional monitoring required

☐ Further intervention needed

Final Approval by HR/Management: \_\_\_\_\_

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

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



## Annex 9: Worker Satisfaction Feedback Form

Case Number: \_\_\_\_\_

Date of Case Closure: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Grievance Officer Handling Case: \_\_\_\_\_

### Section 1: Worker Satisfaction Resolution

How satisfied are you with the resolution of your grievance case?

- ☐ Very Satisfied
- ☐ Satisfied
- ☐ Neutral
- ☐ Dissatisfied
- ☐ Very Dissatisfied

Did the resolution address your concerns effectively?

- ☐ Yes, completely
- ☐ Yes, but only partially
- ☐ No, my concerns were not addressed

What aspects of the resolution were most helpful?

- ☐ Fairness of the decision
- ☐ Timeliness of resolution
- ☐ Communication and transparency
- ☐ Support from management or HR
- ☐ Other (please specify): \_\_\_\_\_

### Section 2: Process Evaluation

How would you rate the grievance handling process?

- ☐ Excellent
- ☐ Good

- ☐ Average
- ☐ Poor
- ☐ Very Poor

Were you treated respectfully throughout the process?

- ☐ Yes
- ☐ No

Did you feel safe and free from retaliation when submitting your grievance?

- ☐ Yes
- ☐ No

### Section 3: Suggestions for Improvement

What could be improved in the grievance resolution process?

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### Section 4: Optional Comments

(Any additional feedback or concerns)

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### Section 5: Acknowledgment

- ☐ I confirm that I have provided honest feedback based on my experience.

Employee Signature (Optional): \_\_\_\_\_

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

## Annex 10: Health and Safety Hazards and Mitigation Measures

**Note:** Specific details on OHS and mitigation measures are captured in the site specific ESMP or OHS action plan.

| Risks/Hazard                              | Description                                                                                                                                                                                      | Mitigation Measures                                                                                                                                                                                                                                                               |
|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Physical Hazards</b>                   |                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                   |
| Heavy Machinery Operation.                | Risks of collisions, rollovers, or improper use of equipment like excavators, bulldozers, and cranes. Potential for workers being struck by moving machinery or falling objects.                 | PPE: Hard hats, safety boots, gloves, high-visibility vests; Training: Operator certification and regular refresher training; Engineering Controls: Guardrails and safety zones.<br>Inspections of heavy equipment and train operators. Flag man for the engineering and control. |
| Working at Heights                        | Risks of falls from scaffolding, ladders, or elevated platforms during construction activities. Falling tools or materials posing dangers to workers below.                                      | PPE: Harnesses, helmets; Engineering Controls: Guardrails, scaffolds and fall arrest systems; Training: Safe work practices.<br>Scaffolds will be inspected after they are mounted before they used by workers                                                                    |
| Slips, Trips, and Falls                   | Uneven or wet surfaces, debris, and poorly maintained walkways increase the risk of accidents.                                                                                                   | Housekeeping: Maintain clean, clear walkways; PPE: Anti-slip boots; Engineering Controls: Anti-slip surfaces and adequate drainage.<br>Warning signs will be used to                                                                                                              |
| Noise Pollution                           | Prolonged exposure to high noise levels from machinery and equipment can lead to hearing loss.                                                                                                   | PPE: Ear protection (earplugs, earmuffs); Engineering Controls: Noise barriers; Administrative Controls: Work rotation to limit exposure.                                                                                                                                         |
| Vibration Hazards                         | Use of handheld power tools (e.g., jackhammers) can cause hand-arm vibration syndrome (HAVS).                                                                                                    | PPE: Anti-vibration gloves; Engineering Controls: Vibration-reducing tools; Health Monitoring: Regular check-ups for early detection of HAVS.                                                                                                                                     |
| Hits from Flying and moving objects       | Flying objects, equipment and tools such as moving cranes and buckets of excavators may hit site workers in the vicinity of work zones                                                           | PPEs: Provision of PPEs and ensure usage.<br>Controls: Work zones will be condoned-off with cautions and bollards/ Warning signs will be pasted to warn workers and unauthorised persons                                                                                          |
| <b>Chemical and Environmental Hazards</b> |                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                   |
| Exposure to Hazardous Materials           | Handling and storage of fuels, oils, solvents, and other chemicals pose risks of spills, fires, or toxic exposure. Inhalation of dust, fumes, or gases (e.g., from asphalt, cement, or welding). | PPE: Protective clothing, gloves, goggles, respirators; Engineering Controls: Spill containment systems, ventilation; Training: Safe handling procedures.                                                                                                                         |
| Air Pollution                             | Dust and emissions from construction activities and vehicles can cause respiratory issues.                                                                                                       | Engineering Controls: Dust suppression systems (water sprays, covers); Administrative Controls: Scheduling to minimise exposure, regular site cleaning.                                                                                                                           |

| Risks/Hazard                                        | Description                                                                                                                                                                    | Mitigation Measures                                                                                                                                                                                                                       |
|-----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Heat Stress                                         | Working in high temperatures without adequate hydration or rest can lead to heat exhaustion or heatstroke.                                                                     | Administrative Controls: Rest breaks, hydration stations; PPE: Lightweight clothing, cooling vests; Training: Recognizing signs of heat stress.                                                                                           |
| Poor Ventilation                                    | Confined spaces or poorly ventilated areas increase the risk of exposure to harmful substances.                                                                                | Engineering Controls: Ventilation systems, regular air quality checks; Administrative Controls: Limiting time spent in confined spaces.                                                                                                   |
| <b>Biological Hazards</b>                           |                                                                                                                                                                                |                                                                                                                                                                                                                                           |
| Waterborne and Vector-Borne Diseases                | Stagnant water at construction sites can breed mosquitoes, increasing the risk of malaria or dengue. Poor sanitation facilities can lead to waterborne illnesses like cholera. | Housekeeping: Regular removal of standing water; Sanitation Facilities: Proper toilets, handwashing stations. Potable water and canteens will be provided for site workers; Health Monitoring: Vaccinations and regular health checks.    |
| Communicable Diseases                               | Close working conditions increase the risk of spreading diseases such as COVID-19, tuberculosis, or influenza.                                                                 | Administrative Controls: Social distancing, PPE (masks), and sanitisation; Training: Disease prevention awareness.                                                                                                                        |
| <b>Ergonomic Hazards</b>                            |                                                                                                                                                                                |                                                                                                                                                                                                                                           |
| Manual Handling                                     | Lifting, carrying, or moving heavy materials can cause musculoskeletal injuries, such as back pain or strains.                                                                 | PPE: Back support belts; Engineering Controls: Mechanical aids for lifting; Training: Proper lifting techniques.                                                                                                                          |
| Repetitive Motions                                  | Tasks requiring repetitive movements (e.g., hammering, digging) can lead to repetitive strain injuries (RSI).                                                                  | PPE: Ergonomically designed tools; Administrative Controls: Work rotation to avoid repetitive tasks; Training: RSI prevention techniques.                                                                                                 |
| <b>Psychosocial Hazards</b>                         |                                                                                                                                                                                |                                                                                                                                                                                                                                           |
| Workplace Stress                                    | High-pressure environments, long working hours, and unsafe conditions can lead to stress, anxiety, or burnout.                                                                 | Administrative Controls: Work-life balance initiatives, stress management programs; Training: Coping with work pressure.                                                                                                                  |
| Sexual Exploitation, Abuse, and Harassment (SEA/SH) | Risks of SEA/SH in male-dominated worksites, particularly affecting women and vulnerable groups.                                                                               | Administrative Controls: Clear anti-SEA/SH policies; Training: Awareness campaigns; Support Systems: Confidential reporting mechanisms, Provision of case management service for affected persons                                         |
| Community Tensions                                  | Interaction between workers and local communities may lead to conflicts or safety concerns.                                                                                    | Administrative Controls: Community engagement and conflict resolution strategies; Nomination of Community Focal Persons and establishment of GRMs with GRCs at the community level. Training: Awareness of community rights and concerns. |
| <b>Fire and Explosion Hazards</b>                   |                                                                                                                                                                                |                                                                                                                                                                                                                                           |
| Flammable Materials                                 | Improper storage or handling of fuels, gases, or chemicals can lead to fires or explosions.                                                                                    | PPE: Flame-retardant clothing; Engineering Controls: Fire-resistant storage containers; Administrative Controls: Safe handling procedures.                                                                                                |

| Risks/Hazard                              | Description                                                                                                                           | Mitigation Measures                                                                                                                                                                                                                                                                                                                            |
|-------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Electrical Hazards                        | Faulty wiring, overloaded circuits, or improper use of electrical equipment can cause fires or electrocution.                         | Engineering Controls: Regular equipment checks, proper grounding, use standards and certified cables and fittings.<br>PPE: Insulated tools, rubber gloves; Training: Electrical safety training.<br>Preparation and implementation of Emergency Response Plans as part ESIA's and ESMPs for sub projects<br>Putting appliances when not in use |
| <b>Traffic and Transportation Hazards</b> |                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                |
| Vehicle Accidents                         | Movement of construction vehicles and equipment in and around worksites increases the risk of collisions with workers or pedestrians. | Engineering Controls: Dedicated vehicle routes, barriers; Administrative Controls: Traffic management plans, signage; PPE: High-visibility clothing.                                                                                                                                                                                           |
| Pedestrian Safety                         | Poorly marked construction zones or lack of barriers can endanger pedestrians and workers.                                            | Engineering Controls: Barricades and pedestrian pathways; Administrative Controls: Signage and safety personnel; PPE: High-visibility vests.                                                                                                                                                                                                   |
| <b>Structural Hazards</b>                 |                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                |
| Collapse of Structures                    | Risks of scaffolding, trenches, or partially constructed structures collapsing due to poor design or overloading.                     | Engineering Controls: Structural integrity checks, use of scaffolding standards; Training: Proper use of scaffolding and equipment.                                                                                                                                                                                                            |
| Excavation Hazards                        | Cave-ins or collapses during digging or trenching activities.                                                                         | Engineering Controls: Trench supports, soil stabilisation; Training: Safe excavation practices.                                                                                                                                                                                                                                                |
| <b>Radiation Hazards</b>                  |                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                |
| Welding and Cutting Operations            | Exposure to ultraviolet (UV) radiation from welding can cause eye damage or skin burns.                                               | PPE: Welding shields, protective clothing, gloves; Training: UV radiation awareness and safe work practices.                                                                                                                                                                                                                                   |
| <b>Emergency and Disaster Hazards</b>     |                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                |
| Natural Disasters                         | Floods, storms, or landslides can pose significant risks to workers and project sites.                                                | Emergency Preparedness: Prepare and implement Emergency response plans, evacuation routes; Training: Emergency drills and evacuation procedures.                                                                                                                                                                                               |
| Medical Emergencies                       | Lack of immediate access to first aid or medical facilities can exacerbate injuries or illnesses.                                     | Emergency Preparedness: On-site first aid kits, trained medical personnel; Health Monitoring: Emergency medical response drills.                                                                                                                                                                                                               |