



LIBERIA ELECTRICITY CORPORATION (LEC)
AND
RURAL AND RRENEWABLE ENERGY AGENCY (RREA)

Liberia Electricity Sector Strengthening and Access Project – Phase 2
(LESSAP-2)

LABOR MANAGEMENT PROCEDURE (LMP)

Final Version

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LIST OF ACRONYMS

ACMS	Asset and Customers Mapping System
AfDB	African Development Bank
AMI	Advanced Metering Infrastructure
BOT	Build, Operate and Transfer
CESMP	Contractor Environmental and Social Management Plan
CLSG	Cote d’Ivoire, Liberia, Sierra Leone and Guinea Interconnection
CPF	Country Partnership Framework
CSC	Customer Service Centers
E&S	Environmental and Social
EMF	Electromagnetic Field
EPA	Environmental Protection Agency
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMAP	Energy Sector Management Assistance Program
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMU	Environmental and Social Management Unit
ESS	Environmental and Social Standard
FSMS	Field Service Management System
GBV	Gender-Based Violence
GOL	Government of Liberia
GRC	Grievance Redress Committee
GM	Grievance Mechanism
IMS	Integrated Management System
KV	Kilovolt
KVA	Kilovolt-ampere
LACEEP	Liberia Accelerated Electricity Expansion Project
LACEEP-AF	Liberia Accelerated Electricity Expansion Project-Additional Financing
LEC	Liberia Electricity Corporation
LERC	Liberia Energy Regulatory Commission
LESSAP-2	Liberia Electricity Sector Strengthening and Access Project (Phase 2)
LIRENAP	Liberia Renewable Energy Access Project
LMP	Labor Management Procedures
LV	Low Voltage
MCC	Millennium Compact Challenge
MDM	Meter Data Management
MME	Ministry of Mines and Energy
MOH	Ministry of Health
MPW	Ministry of Public Work
MSC	Management Service Contract
MV	Medium Voltage
MW	Mega Watt

NEP	National Energy Policy
NES	National Electrification Study
O&M	Operation and Maintenance
OGS	Off Grid Solar
OHS	Occupational Health and Safety
PAPD	Pro-Poor Agenda for Prosperity and Development
PCMU	Project Coordination and Management Unit
PDO	Project Development Objective
PIU	Project Implementation Unit
PMT	Project Management Team
PPE	Personal Protective Equipment
PV	Photovoltage
RBF	Results-Based Financing
ROW	Right-of-Way
RREA	Rural and Renewable Energy Agency
SCADA	<u>Supervisory Control and Data Acquisition</u>
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SHS	<u>Solar Home System</u>
TOR	Terms of Reference
UV	Ultraviolet
VAC	Violence Against Children
WB	World Bank

1 BACKGROUND

After more than fifteen years of civil war in Liberia, the new democratically elected government took over a country with severe challenges. The civil war destroyed much of Liberia's physical and human capital and damaged many institutions. The new government has sought international support in revitalizing its capital and institutions, and has endorsed programs aimed at improving governance, building capacity, and managing post-conflict recovery through establishing policies to stabilize the economy and support economic reconstruction.

Prior to the civil war in 1989, the Liberia Electricity Corporation (LEC) had a total installed generation capacity of 197MW (63MW from Mt. Coffee hydro, and 124MW from heavy fuel oil plants) serving about 35,000 households in the capital Monrovia, representing about 7 percent of the country's population. A total of 13MW from ten small, isolated power systems supplied the rural county capitals. By the end of the war in 2003, almost all the electricity infrastructure, including the transmission and distribution network, had been destroyed or looted. LEC ceased operation during the crisis leaving the sector non-operational. Following a peace treaty and a successful election in 2006, massive donor resources were mobilized to implement the Emergency Power Programs (2006-2012) that led to reestablishment of LEC's operations and allowed for the installation of up to 22MW high-speed diesel generators and reconstruction of some basic transmission and distribution infrastructure in limited areas of Monrovia.

The Government of Liberia (GOL) has intensified its commitment to the provision of energy services through the recent development of a National Energy Policy (NEP), which calls for universal and sustainable access to affordable and reliable energy supplies to foster the economic, political, and social development of Liberia. One of the key pieces of the NEP related to rural energy is the creation of a Rural and Renewable Energy Agency (RREA) whose long-term goal is to facilitate the economic transformation of rural Liberia by accelerating the commercial development of modern and renewable energy services in rural areas.

The proposed Liberia Electricity Sector Strengthening and Access Project – Phase 2 (LESSAP-2 or “the Project”) follows the preceding LESSAP-1. As with LESSAP-1, LESSAP-2 is closely aligned with the objectives of the World Bank (WB) Group's Country Partnership Framework (CPF) for Liberia for FY19-24 and Liberia's medium-term development plan, and the Pro-Poor Agenda for Prosperity and Development (PAPD) 2018-2023. Both the CPF and PAPD identify the expansion of electricity services and its affordability for businesses, households and public institution as a necessary intervention to address constraints to economic growth, human capital development and poverty reduction.

The proposed LESSAP-2 is also consistent with the World Bank Group's twin goals of ending extreme poverty and promoting shared prosperity, and achieving sustainable development on a livable planet. The Project directly supports human capital development through the provision of sustainable, uninterrupted electricity services to health facilities. The Project would also contribute to achieving one of the outcomes of Liberia's First Inclusive Growth Development Policy Operation (P168218) which is to bolster the financial sustainability of the largest state-owned enterprise (SOE), LEC, to reduce the fiscal risks posed by the SOE sector.

This report describes the Labor Management Procedures (LMP) related to LESSAP-2.

2 INTRODUCTION

2.1 Project Description

2.1.1 Project Components

The Project Development Objective (PDO) of LESSAP-2 is to expand the access to electricity services, and enhance the operational performance of LEC, building upon the work carried out under LESSAP-1 to increase access to electricity and improve operational efficiency of LEC.

Continuing from LESSAP-1, the proposed LESSAP-2 will continue to contribute to the GOL target of increasing electricity access to 70 percent of the country by 2030 from the current rate of 28 percent and turn around the operational and financial performance of the national utility. The Project will target two key areas in Liberia's energy sector:

1. Grid electrification mainly in the Capital Monrovia and economic corridors of Kakata and Bomi counties implemented by LEC. These communities either have existing electricity or there is an ongoing electrification project because not all areas of the communities would benefit from LESSAP-2. The actual existing networks to be rehabilitated and the distribution line routes for network extension will be determined after the detailed design works are completed; and
2. Off-grid solar electrification in educational and health centers and remote communities across all 15 counties to be spearheaded by RREA.

The grid component to be implemented by LEC will: (a) increase grid electricity access by rehabilitating and expanding medium voltage (MV) and low voltage (LV) distribution network and connect new households and business; (b) reduce commercial losses by replacing all faulty meters and regularizing all unmetered or illegally connected households and businesses as well as implementing revenue protection measures; (c) decentralize the operations (technical and commercial) into districts to bring delivery of quality electricity services closer to consumers and help LEC to better manage commercial losses; (d) automate the technical operations to improve reliability of supply and better integration with Côte d'Ivoire, Liberia, Sierra Leone and Guinée (CLSG) interconnection; and (e) ensure a smooth transition to full-time sustainable management and strengthen the managerial and staff capacity of LEC to ensure its operational and financial sustainability.

Some components / subcomponents of LESSAP-1, including solar home systems (SHS), health and educational facilities electrification under the off-grid component (2), household / residential metering, and additional software installation at LEC, will be carried over and scaled up under LESSAP-2.

The off-grid component will extend solar photo voltaic (PV) electricity services primarily to remotely located health facilities. Guided by Liberia's National Export Strategy (NES), the component will also support a design and implementation of a pilot for a more concessional approach to deploy SHS to households in very remote and dispersed communities, and support single-community smaller mini-grids in areas where it is feasible.

The district offices and community service centers (CSC) (comprising 20-footer containerized office structures) will be located on lands within existing LEC substations where feasible. For areas with no existing substation or where the existing substation is not suitable, LEC will arrange with county/district local authorities for suitable public lands in the catchment areas for their construction.

Off-grid Solar (OGS): It is estimated that about 300 health facilities will benefit from the OGS, but the selection of the specific health facilities and their locations has not yet been completed. The RREA is collaborating with the Ministry of Health (MOH) to select the health facilities to benefit from the Project. The communities to benefit from the pilot solar mini grids and the SHS will be selected from the report of the NES study which is in the final stages of completion. Communities, except Monrovia, will be selected from across all counties.

The proposed LESSAP-2 is comprised of the following three components and sub-components (sub-projects) as follows:

Component 1 Rehabilitation and Expansion of Electricity Infrastructure and Systems and Enhancement of LEC Revenue Protection (IDA US\$ 14 million): This component initially involved four subcomponents as part of LESSAP-1. As noted below, subcomponent (1 (c) Establishment of District Offices and Customer Service Centers (CSC) was dropped from LESSAP-1.

The remaining two sub-components include the following:

- **Subcomponent 1a: Rehabilitation and expansion of the distribution network (IDA US\$ 4 million):** The subcomponent will complete the installation of the Supervisory Control and Data Acquisition (SCADA) System initiated under the first phase to ensure oversight, proactive network problem detection and resolution, adequate network reliability, obtain required power quality data for real time operational decision. The subcomponent will also continue the densification and expansion of distribution network. Since the number of communities identified under the first phase was reduced due to the reallocation of funds during the March 2023 restructuring, the proposed subcomponent would intensify the network to include all households in the beneficiary communities and extend supply to the new communities along the corridor.
- **Subcomponent 1.b: Revenue Protection Program (IDA US\$10 million):** The subcomponent will enhance the installation of an advanced-metering infrastructure (AMI) platform under the first phase to include the connection and monitoring of large commercial customers via Meter Data Management (MDM) and ensure accurate measurement of their consumption and prevent tampering with metering systems. It will also fund the procurement of 50,000 prepayment meters for households that will support the replacement of damaged meters, new connection and regularization of illegal connections. In addition, the subcomponent will support enhancements to the LEC Integrated Management System (IMS) through the addition of a Geographic Information System (GIS), a Field Service Management System (FSMS), and a mobile add-on to the Enterprise Asset Management module and the implementation of the Asset and Customers Mapping Survey (ACMS) for LEC to have accurate information on the point of sale of

electricity due to the outdated and inaccurate customer database. The enhancements to the IMS will enable LEC to work with geographical network data and maintain that data as the network grows, control the dispatch and execution of field orders for meter installation, trouble call resolution, network operations and maintenance, and network design and construction activities. The ACMS and the enhanced IMS will also enable LEC to effectively manage client arrears and non- technical losses and improve operational efficiency.

Component 2: Off-grid Electrification of Households, Public Facilities, and Stimulation of Productive Uses in Rural Areas (IDA US\$ 13 million; ESMAP grant US\$ 3 million): This component will scale up the activities under the first phase off-grid electrification component with a focus on mobilizing private capital. Due to the groundwork laid out in phase one, the second phase would focus on accelerating the off-grid activities and devise methods of sustainability through private sector participation.

- **Subcomponent 2.a: Electrification of public facilities in rural areas (IDA US\$ 6 million):**

- a. **Subcomponent 2.a (i): Electrification of health facilities:** Liberia has about 836 functioning health facilities comprising 38 hospitals, 61 health centers and 736 clinics.

About 95 percent of these facilities have no electricity or rely on costly diesel generators, and for the few that have grid electricity (mostly in the Capital Monrovia), supply is intermittent and of poor quality. Thus, electrification of health facilities has emerged as a priority especially following recent epidemics like Ebola and COVID-19. This subcomponent will focus on the urgent provision of solar PV services to selected health facilities to enhance the delivery of healthcare services and improve their resilience. It will target health facilities in underserved and remote rural areas in the country which are identified as priority by the Ministry of Health (MOH) in coordination with RREA.

- **System Design:** The facilities will be supplied with standalone or hybrid solar photo-voltaic (PV)-with-battery energy systems which, depending on type and size of facility, are expected to supply electricity for, among others, (a) medical equipment loads; (b) inside and outside lighting; and (c) office equipment. System designs are standardized, informed by a series of site-specific technical assessments (energy audits), in close coordination between RREA and the MOH, under LESSAP first phase, with eight standardized system sizes based on the level-of-service of facilities. Additional surveys will be carried out in parallel to implementation to further improve targeting and avoid donor overlap. The PV arrays would be mounted mainly on roof tops of buildings or walkways or poles or in empty spaces within the facilities and thus would not require the acquisition of private lands. The lithium-ion batteries used in the designs are safer and easier to manage than other alternatives, with substantially longer operational life and safer for final disposal. However, the batteries will still require special arrangements to ensure proper

recycling/disposal after the end of their useful lives. The systems allow for remote monitoring of operations, fault diagnostic and troubleshooting.

- **Business Model and Financing approach:** The subcomponent would finance (a) the supply and installation of the solar PV systems and required electrical appliances, including provision of basic operation, maintenance and safety training for health workers; (b) operations and maintenance of the installed system; and (c) TA for procurement and contract management as well as developing local capacity for repair and maintenance of such systems. The second phase would also explore mechanisms of energy as a service (EaaS) model for increasing sustainability and promoting private sector participation.
- b. **Subcomponent 2.a (ii): Electrification of education facilities:** Besides health facilities, the Project will also electrify education facilities. Sites will be selected in coordination with the Ministry of Education, with the aim to exploit synergies with ongoing World Bank interventions in the education sector such as Excellence in Learning in Liberia (EXCEL) - P181455 as well as synergies from proximity to supported health facilities. The designs developed for health facilities will be adjusted based on energy surveys of education facilities, with the aim to develop a set of standardized, modular designs. Operation and maintenance will follow the same approach as the health facilities.
- **Subcomponent 2.b: Deployment of solar home systems for households and off-grid productive uses (IDA US\$ 2.5 million, ESMAP grant US\$ 1.5 million):** The subcomponent will support scaling up the program by providing results-based financing (RBF) to private off-grid solar companies for solar home systems (SHS) for households developed under the first phase and expand it to include larger systems for productive uses enterprises. The RBF is designed to support the affordability of solar PV systems through partial grants for direct price reductions (i.e., grants that directly translate into price reductions for end-consumers compared to prices charged in currently served areas) and indirect price reductions (i.e., grants that cover the increased costs of expanding the supply chain to cover new areas and/or implement new business models).
 - **Subcomponent 2.c: Piloting private-sector led mini grids (IDA US\$ 4.5 million, ESMAP grant US\$ 1.5 million):** This subcomponent would support the design and implementation of pilots for reaching dispersed communities through privately-owned mini-grids. LESSAP-1 carried out pre-feasibility assessments of 47 sites. On average, a mini-grid site has a demand of 732 kWh/day and the average demand per connection is 2 kWh/day. Solar-diesel hybrid mini-grids with lithium-ion energy storage with low voltage distribution are considered the most viable supply option. LESSAP Phase 1 also developed standard grant agreements. The pilot provides partial, results-based grants to mini-grids, with the private sector expected to mobilize a substantial share of the financing. Developers would be selected through a call-for-proposals, with flexibility for private sector companies to select among the 47 pre-feasibility sites, or propose their own sites. The pilot would be used to demonstrate the technical and commercial viability of mini-grid development in Liberia and its attractiveness to the private sector. The pilot will be developed in close coordination with IFC as well as UNDP's Africa Mini Grid program. Overall, this sub-component is expected to mobilize US\$ 1.5 million in private capital.

Component 3: Technical Assistance, Training and Capacity Building of Project Implementation Support (IDA US\$ 3 million): This component will cover the cost of strengthening the capacity of LEC Project Management Team (PMT) to manage and monitor implementation activities. It will include financing the cost of specialized consultants (technical, financial, procurement, audit, safeguards, etc.) and project staff to support the PMT, the preparation of technical design and safeguards documents, community engagement and sensitization programs, working on inclusivity and implementation of gender actions plans amongst others.

2.2 Objective and Rationale for Labor Management Procedures (LMP)

These LMP are required by the Environmental and Social Framework (ESF) of the WB, and its Environmental and Social Standard (ESS) 2 on ‘Labor and Working Conditions.’ Its scope includes:

- Labor and contracts;
- Management of workers;
- Occupational Health and Safety; and
- Access of information and grievance mechanisms.

The primary objective of WB ESF ESS 2 is to promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly while also providing them with safe and healthy working conditions. Specific objectives embedded in this general objective include:

- To promote safety and health at work;
- To promote the fair treatment, nondiscrimination and equal opportunity of project workers;
- To protect workers including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS), migrant workers, contracted workers, community workers and primary supply workers, as appropriate;
- To prevent the use of forced labor and child labor;
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; and
- To provide project workers with accessible means to raise workplace concerns.

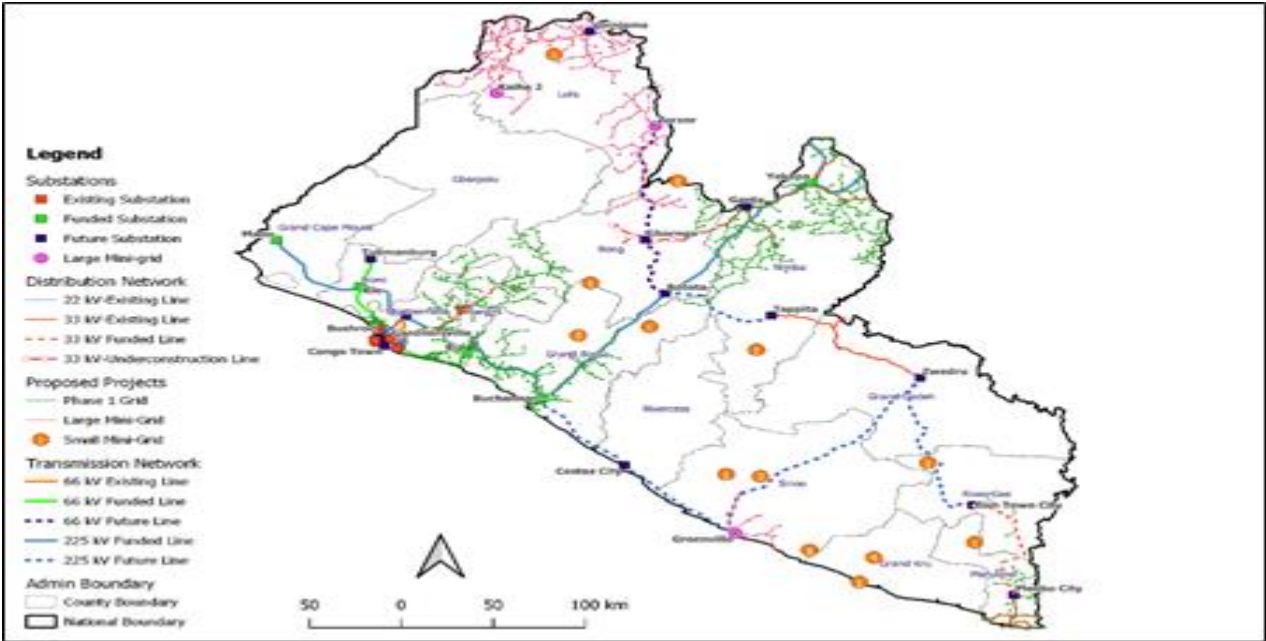
Accordingly, the purpose of this LMP is to facilitate the planning and implementation of the LESSAP-2 by identifying the main labor requirements and the environmental and social measures necessary to address the project-related labor issues. The LMP also sets out general guidance relevant to different forms of labor but also issues and concerns specific to the Project.

2.3 Project Locations, Beneficiaries and Project Affected People

Proposed grid connections for the period 2021 to 2030 are shown in **Figure 1**. The grid electrification would be implemented in communities mainly in the capital Monrovia and in the economic corridors of Margibi and Bomi counties. These communities either have existing

electricity (but of poor quality) or there is an ongoing electrification project (but not within areas that could be covered). The actual existing networks to be rehabilitated and the distribution line routes for network extension would be determined after the detailed design works are completed. Households will greatly benefit from improved access to cheaper electricity, while other beneficiaries include small businesses and industries that have been waiting for more reliable energy provision. In addition, government agencies and public institutions (schools, health facilities, churches and mosques) will also have improved energy access, and this will have positive indirect social impacts for the communities.

Figure 1: Electricity Connection Plans in Liberia from 2021 to 2030



Off-grid Solar (OGS): It is estimated that about 300 health facilities require electricity supply. However, the selection of specific health facilities that will be supplied with electricity and their locations has yet to be completed. RREA is collaborating with MOH to select the health facilities to benefit from the Project. The communities to benefit from the pilot solar mini grids and the SHS will be selected from the report of the National Electrification Strategy study which was completed in 2020. The health facilities will benefit from improved modern electricity services which, in turn, will contribute to the provision of improved healthcare to the communities.

3 OVERVIEW OF LABOUR USE ON THE PROJECT

3.1 Types of project workers

Implementation of LESSAP-2 will involve different categories of workers for different activities associated with the response activities. WB ESF ESS2 classifies project workers into the following

four groups: (i) direct workers; (ii) contracted workers; (iii) primary supply workers; and (iv) community laborers. As per this classification and labor needs of the Project, three groups of workers including Contracted Workers, Primary Supplier Workers, and Direct Workers will be required. The following categories of workers are expected to be key in the response activities.

3.1.1 Direct Workers

3.1.1.1 Project Implementation Unit (PCMU/PIU)

The LMP for LESSAP-2. 2 applies to all three applicable categories of workers: direct workers, contracted workers, and primary supply workers. Direct workers include those specifically employed for LESSAP-2, excluding civil servants seconded from other government roles. They are tasked with managing key project components such as project management, financial management, procurement, environmental and social safeguards, and addressing gender-based violence (GBV), sexual exploitation and abuse, and sexual harassment (SEA/SH) issues. The LMP also extends to contracted workers engaged through third-party contractors, as well as primary supply workers involved in providing essential goods and materials for the project. This comprehensive approach ensures that all labor categories under LESSAP-2 are covered and managed in accordance with national and international standards

At the RREA, the PIU managing LESSAP-2 will consist of approximately 16 direct workers. These will include existing staff from the Liberia Renewable Energy Access Project (LIRENAP) Phase-One, such as the Project Coordinator, Project Engineer, Procurement Specialist, Environmental Safeguard Specialist, Social Safeguard Specialist, Civil Engineer, Electrical Engineer, PICO PV Specialist, Business Development Specialist, Result-Based Financing Specialist, IT Officer, and an Accountant. For LESSAP-2, the PIU will be further reinforced with three additional safeguard staff: an Environmental Assistant, a Social Safeguard Assistant, and a Gender Assistant. A Monitoring and Evaluation Specialist will also be added to the team to ensure robust tracking of project outcomes and compliance with environmental and social safeguards. The RREA PIU and its Environmental and Social Safeguard Unit have developed strong capabilities from managing previous projects such as LIRENAP and will bring this experience into managing LESSAP-2.

At the LEC, the PIU managing LESSAP 2 will consist of approximately 30 direct workers including staff involved in the initial LESSAP 1. The 30 direct workers will consist of a Project Manager, Technical Coordinator, M&E Specialist, Environmental Specialist, Gender and Social Safeguards Specialist, Environmental Assistant, Gender and Social Assistant, Senior Procurement Specialist, Local Procurement Specialist, Procurement Assistants (2), Senior Financial Management Specialist, Senior Accountant (2), IT Officer, Finance & Admin. Assistant (2), Engineers in Training (4), Fleet Manager and Drivers (7). The LEC PIU will also receive support from seconded LEC employees of the LEC Project department (Civil and Electrical Engineers as well as the Environmental and Social Management Unit (ESMU)),

In total, the direct workers assigned to LESSAP-2 will include approximately 16 staff members at RREA and 30 staff members at LEC. Both teams will be responsible for overseeing fiduciary management, environmental and social risk mitigation, and technical project implementation, ensuring compliance with both the World Bank's Environmental and Social Framework (ESF) and Liberia's national regulations.

To enhance their capacity to manage social and environmental risks effectively, all direct workers employed for LESSAP-2 will receive regular training on the World Bank's Environmental and Social Standards (ESS). This training will focus on addressing emerging challenges, applying best practices, and ensuring that all activities comply with the ESF throughout the project lifecycle.

In conclusion, this staffing structure at RREA and LEC, focused on direct workers specifically hired for LESSAP-2, will provide the expertise necessary to manage the project's goals effectively while adhering to international standards and national regulations. The teams will work collaboratively to ensure that fiduciary, environmental, and social responsibilities are fully met, drawing on their experiences from managing projects like LIRENAP at RREA and LACEEP & LACEEP-AF at LEC.

3.1.1.2 Short Term Technical Staff

In addition to the permanent staff of the PCMU/PIU who are required for the full duration of the Project, the Project may directly hire other technical staff for limited durations based on specific needs. These staff members may be brought on to provide specialized expertise in various project components.

The classification of workers is based on the nature of their contractual arrangement, rather than the duration of their employment. Conversely, individuals directly hired by the PIU or PCMU, whether for short-term or long-term positions, are classified as direct workers and are covered by this Labor Management Plan (LMP).

Therefore, the project may engage both direct and short-term technical staff, depending on the nature of the work and the specific contractual arrangements. This distinction ensures that the labor rights, health, and safety standards outlined in ESS2 are correctly applied, providing fair treatment and protection to workers based on their contractual status. This distinction between vary category of workers is necessary to account for the different management needs and compliance requirements based on employment duration. Short-term workers often require tailored provisions for temporary assignments, while long-term workers may need broader benefits and protections. This differentiation ensures that each group receives appropriate oversight, reducing compliance risks and aligning management practices with their specific employment terms.

Civil servants seconded or assigned to work on the project, whether full-time or part-time within the PCMU/PIU, are not classified as direct workers under this LMP. They remain governed by their existing public sector employment agreements, as stipulated in Paragraph 8 of ESS2 of the World Bank's Environmental and Social Framework (ESF). Consequently, the specific provisions

of this LMP, such as those related to employment terms and labor conditions, do not apply to civil servants.

However, in accordance with ESS2, Paragraph 8, the project is still obligated to safeguard the occupational health and safety (OHS) of these civic servants while they are engaged in project activities. This entails implementing measures to provide a safe working environment in line with international standards. While their employment conditions are managed under their public sector agreements, the project will ensure that civic servants involved are adequately protected against OHS risks, thereby ensuring their safety without altering their existing employment arrangements.

3.1.2 Contracted Workers

Components 1 (distribution lines, etc.) and 2 (off-grid systems using photo-voltaic systems) will use contractors to construct the civil works. All of the workers required during construction, rehabilitation and renovation activities will be classified as contracted workers. Contracted workers will be needed for vary tasks, including masonry, electrical installation, and general support activities plumbing and support activities under Components 1 and 2. Masonry work will be necessary for constructing or reinforcing the foundations of electrical poles, transformers, and substations. Additionally, masonry services will be used in the construction of enclosures for electrical equipment and control rooms, providing essential protection from environmental elements and vandalism. Plumbing work may also be required for the installation of cooling systems or to ensure proper drainage in areas where electrical equipment is housed, which helps maintain the safety and functionality of the infrastructure.

The number of contracted workers will vary throughout the period of renovation activities, segmented between grid and off-grid components of the project. Although an exact figure is not yet available due to variability in project scope, site conditions, and the finalization of design and procurement processes, a broad estimate can be provided. For grid-related activities, an estimated 12 contractors with 75 workers each would involve approximately 900 workers. In parallel, off-grid activities may require around 7 contractors, each employing 25 workers, bringing the total to around 175 workers. This suggests that the combined workforce could range from over 1,000 to more, depending on the final project configuration. .

3.1.3 Primary Supply Workers

The project will engage primary supply workers comprising manufacturers of materials and equipment that will be used during construction. Primary supply workers are essential to both the grid and off-grid components, supplying and delivering key materials like solar panels, batteries, transformers, and wiring.

For the grid component, primary supply workers will handle materials for expanding and rehabilitating distribution networks in urban and peri-urban areas. In the off-grid component, they supply equipment for solar home systems and mini-grids in rural areas. Key risks include exposure to hazardous materials, difficult working conditions, and environmental concerns, particularly related to battery disposal.

To mitigate these risks, the project enforces strict OHS protocols, ensuring proper training and the use of Personal Protective Equipment (PPE). A Grievance Mechanism (GM), adapted from LESSAP-1, will address labor concerns and ensure fair treatment, with new systems introduced where necessary. The GM, overseen by the Project Implementation Unit (PIU) and monitored by the Environmental and Social Management Unit (ESMU), will provide confidential channels for workers to report issues, ensuring their rights and safety throughout the project.

Given the identified risk of forced labor in the solar supply chain, mitigation efforts will be integrated directly into the procurement process. Effective mitigation will require close collaboration with the procurement team to ensure that all necessary provisions are incorporated into procurement documents and procedures. This includes implementing the mandatory Forced Labor Performance Declarations, qualification requirements, and robust contractual clauses in line with the World Bank’s Environmental and Social Framework (ESF) standards. These measures will apply to both international and national competitive procurement, as well as direct selections or contracting, ensuring that forced labor risks are addressed from the outset of supplier engagement and throughout the project lifecycle.

To facilitate continuous monitoring, procurement documents will clearly define expectations and compliance requirements for suppliers and subcontractors. This will include regular reporting obligations and specific measures to track and verify adherence to anti-forced labor commitments. By maintaining strong coordination between the procurement and project management teams, the project aims to enforce rigorous oversight and prevent any potential forced labor issues from arising during project implementation.

3.2 Assessment of Key Potential Labor Risks

3.2.1 Project Activities and Key Labor Risks

The potential labor risks include: working conditions; work-related discrimination; GBV/SEA/SH; and OSH risks. Additionally, project-specific labor risks include wage and benefits issues, child labor and forced labor, health and well-being concerns, worker rights violations, ethical conduct and integrity, and privacy and data security. are listed in **Table 1**:

Table 1: Key Labor Risks in the LESSAP-2

Project Activities/ Type of Labor Risks	Key Labor Risks	Mitigation Measures
Workers’ rights	<ul style="list-style-type: none"> Inadequate terms and conditions of employment for employees and consultants including those relating to hours of work, wages, overtime, etc. 	<ul style="list-style-type: none"> The safeguard team will closely supervise the Contractor Recruitment Plan and ensure recruitment procedures are transparent, public and non-discriminatory, and open with respect to ethnicity, religion, sexuality, disability or gender;

Project Activities/ Type of Labor Risks	Key Labor Risks	Mitigation Measures
	<ul style="list-style-type: none"> • Discrimination in relation to recruitment, hiring, compensation, working conditions, terms of employment, etc. • Social tensions due to concerns about community health and safety. • Absence of a mechanism to express grievances and protect rights regarding working conditions and terms of employment. • The potential for Child labor and forced labor, particularly within the supply chains of solar panels, solar mini-grids, and electrical infrastructure, poses a significant labor risk that necessitate stringent oversight, rigorous compliance measures, and proactive monitoring to protect worker rights and prevent exploitative practices. • Inadequate terms and conditions of employment for employees/consultants, including those relating to hours of work, wages, overtime, etc. 	<ul style="list-style-type: none"> • All information and documentation will be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur. • Where applicable, project workers will receive written notice of termination of employment and details of severance payments in a timely manner. • Project workers will be paid on a regular basis as required by national law and labor management with a principle of “equal pay for equal work” • All project workers will be provided with adequate periods of rest per week, annual holiday and sick leave, as required by national law. • The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices. • The contractor will be compelled to safeguard the interests of women and girls, including gender parity at the workspace, appropriate sanitation facilities at workplace and appropriate PPEs for women. • A Grievance Mechanism (GM) will be established, and contractors will be required to abide by the provisions of the GM. The safeguard team will review records on a monthly basis. and reflect in quarterly reports to the World Bank.

Project Activities/ Type of Labor Risks	Key Labor Risks	Mitigation Measures
	<p>Gender Action Plan (GAP) ensuring gender issues are adequately addressed and integrated into workers' rights throughout the project's lifecycle.</p>	<ul style="list-style-type: none"> • Contractors will be encouraged to minimize risks related to labor influx by utilizing community labor or local contractors wherever possible. Additionally, bid and contract documents will mandate that solar PV panels and other materials must be sourced exclusively from suppliers who certify that their supply chains are free from child labor and forced labor, ensuring compliance with international • Develop a Gender Action Plan (GAP) in alignment with the National Gender Policy of Liberia to ensure the integration of gender considerations into all aspects of the project. The GAP will focus on addressing gender-related issues and promoting gender equality under workers' rights, ensuring equitable treatment, opportunities, and protections for all workers throughout the project life cycle.
Privacy and Data Security	<ul style="list-style-type: none"> • Misuse or breach of personal information • Inadequate data protection for workers 	<ul style="list-style-type: none"> • Ensure compliance with national data protection laws. • Implement secure storage and data handling protocols. • Train workers on data security and privacy standards.
Occupational Health and Safety (OHS) risks during construction and renovation activities	<ul style="list-style-type: none"> • Slips and falls • Falls from height • Contact with moving parts of machines and tools • Contact with electrical tools and wires (electrocution) • Inadequate wiring and overloaded circuits • Exposure to hazardous substances • Overexertion 	<ul style="list-style-type: none"> • Restrict access to the construction site by proper fencing or create buffer areas around the site. • Provide guards on entrances and exits to the site. • Install warning signs at the entrance of the site to prohibit public access. • Provide training about the fundamentals of occupational health and safety procedures. • Provide appropriate personal protective equipment (PPE) (impermeable latex gloves, working overalls, safety boots, safety helmets, hearing protecting devices for

Project Activities/ Type of Labor Risks	Key Labor Risks	Mitigation Measures
	<ul style="list-style-type: none"> • Moving vehicles and equipment and falling objects • Exposure to high level of noise • Heat exhaustion • Exposure to dust and damaged insulation • Exposures to metal fumes and to ultraviolet (UV) radiation • Exposure to hand-arm vibration (HAV) or whole-body vibration (WBV) • Working in confined spaces • Working over water 	<p>workers exposed to noise levels exceeding 90 dBA8, self-arrest harnesses for working at heights, and lifesaving vests for construction sites near water bodies).</p> <ul style="list-style-type: none"> • Ensure that workers can swim and that lifesaving rings are available at worksites near water. • Ensure that the protective material is being used wherever it is required. • Ensure that especially sensitive or dangerous areas (like areas exposed to high noise levels, areas for especially hazardous work etc.) are clearly designated. • Ensure that all maintenance work necessary for keeping machines and other equipment in a good state will be regularly carried out. • Ensure that the workers are qualified, well trained and instructed in handling their equipment, including health protection equipment. • Provide adequate loading and off-loading space. • Develop an emergency response plan. • Provide on-site medical facility/first aid. • Provide appropriate lighting during night-time works. • Implement speed limits for trucks entering and exiting the site. • Ensure that hazardous substances are being kept in suitable, safe, adequately marked and locked storing places. • Ensure that containers of hazardous substances are clearly marked, and that material safety data sheets are available. • Ensure that all workers dealing with hazardous substances are adequately informed about the risks, trained in handling those materials, and trained in first aid measures to be taken in the case of an

Project Activities/ Type of Labor Risks	Key Labor Risks	Mitigation Measures
		<p>accident.</p> <ul style="list-style-type: none"> • Conduct accident investigation to determine immediate/root causes to prevent future accidents. Report all accidents/incidents within 24hrs of occurrence. • Designate an area where contaminated materials and hazardous waste can be stored for proper disposal according to environmental guidelines. • Adopt good housekeeping practices for ensuring hygiene on site. • Eliminate pools of stagnant water, which could serve as breeding places for mosquitoes. • Provide bed nets for workers living on site. • Eliminate waste of all types, including wastewater. • Provide a safety specialist responsible for the preparation, implementation and maintenance of a comprehensive safety program. • For the rehabilitation and/or construction of fuel supply facilities, provide fire-fighting equipment such as dry powder extinguishers. • Conduct fire-fighting and leak checks training drills for the construction staff. Additionally, training for workers will include specific instruction on the fire risks associated with lithium-ion batteries and the proper techniques to extinguish a Li-ion battery fire, ensuring the safety of both workers and the site during construction activities. • Prohibit smoking as well as litter or weed build up in the area as these may pose fire risks. • Only allow trained and certified workers to install, maintain, or repair electrical equipment • Deactivate and properly ground live power

Project Activities/ Type of Labor Risks	Key Labor Risks	Mitigation Measures
		<p>distribution lines before work is performed on, or in close proximity, to the lines; follow lock-out procedures where required</p> <ul style="list-style-type: none"> • Ensure that live-wire work is conducted by trained workers with strict adherence to specific safety and insulation standards • Where maintenance and operation is required within minimum setback distances, define specific training, safety measures, personal safety devices, and other precautions in a health and safety plan • When working at height, test structures for integrity prior to undertaking work. • Implement a fall protection program that includes training in climbing techniques and use of fall protection measures; inspection, maintenance, and replacement of fall protection equipment; and rescue of fall-arrested workers. • Establish criteria for use of 100 percent fall protection. • Provide an adequate work-positioning device system for workers. • Connectors on positioning systems should be compatible with the tower components to which they are attached. • Properly rate and maintain hoisting equipment and properly train hoist operators. • Ensure that safety belts are not less than 16 mm two-in-one nylon or material of equivalent strength. • Replace rope safety belts before signs of aging or fraying of fibers become evident. • When operating power tools at height, use a second (backup) safety strap. • Remove signs and other obstructions from poles or structures prior to undertaking work. • Identify potential exposure levels to electric and magnetic fields (EMF) in the workplace,

Project Activities/ Type of Labor Risks	Key Labor Risks	Mitigation Measures
		<p>including surveys of exposure levels in new projects and the use of personal monitors during working activities.</p> <ul style="list-style-type: none"> • Train workers in the identification of occupational EMF levels and hazards. • Establish and identify safety zones where EMF levels are acceptable for public exposure. • Implement action plans to address potential or confirmed exposure levels that exceed reference occupational exposure levels (limiting exposure time through work rotation, increasing the distance between the source and the worker, or the use of shielding material). • Train personnel to apply pesticides and ensure that personnel have received the necessary certifications or equivalent training where such certifications are not required. • Respect post-treatment intervals to avoid operator exposure during reentry to crops with residues of pesticides. • Ensure hygiene practices are followed to avoid exposure of family members to pesticides residues. • Proper planning and development of a traffic control plan that considers the reservations and inputs of local communities. • Proper dissemination of information regarding the construction schedule • Provide alternate routes when needed and when feasible during all phases of construction. • Ensure safety of motorists through adequate warning, signing, delineation and channeling at least 500 m down and up-gradient from the construction site. • Limit the movement of heavy machinery during the construction phase to off-peak

Project Activities/ Type of Labor Risks	Key Labor Risks	Mitigation Measures
		<p>hours and provide prior notification.</p> <ul style="list-style-type: none"> • Provide a traffic re-routing plan for the construction phase at the bidding stage. • Provide awareness campaigns for staff and immediate local communities on the risks, dangers, impacts and appropriate avoidance behaviors regarding Sexually Transmitted Infections (STIs), Sexually Transmitted Diseases (STDs), and HIV and AIDs. • Provide regular supply of condoms to male and female workers. • Provide adequate on-site supply of water for drinking and other use for local workers. • Provide separate toilet facilities on site for male and female workers. • Keep records and provide report of damaged properties and livelihood sources during construction (structures, perennial tree crops, etc.). • Select project site and rights-of-way (ROW) to avoid areas of human activity. • Utilize alternative designs to reduce land and ROW width requirements and minimize land use impacts. • Prioritize local employment where the required skills and expertise can be locally sourced. • Keep employment records of workers on site for inspection (e.g., names of staff, category, ages, gender, hours worked and wages paid). • Set up functional GMs for workers and affected communities and document and report grievances received. • Conduct regular consultation and sensitization meetings with workers and affected communities regarding project activities and GMs.
SEA and SH	<ul style="list-style-type: none"> • SEA/SH 	<ul style="list-style-type: none"> • Develop a Sexual Exploitation, and Abuse, Sexual Harassment (SEA/SH) Action Plan to

Project Activities/ Type of Labor Risks	Key Labor Risks	Mitigation Measures
		<p>address and mitigate risks related to SEA/SH during project implementation, ensuring that specific measures are in place to prevent and respond to these issues throughout the project life cycle. This plan will be in alignment with the national policies and international standards.</p> <ul style="list-style-type: none"> • Establish functional GM for workers and affected communities and document and report GBV and SEA/SH grievances received. • Conduct regular consultation and sensitization meetings with workers and affected communities regarding GBV and SEA/SH, including provisions of the Liberia Decent Work Act as related to project activities and GMs. • Provide confidential GM services for any person filing a GBV/SEA/SH complaint. Develop a comprehensive Gender Action Plan (GAP) that aligns with the National Gender Policy of Liberia. The GAP should be designed to integrate gender considerations throughout the project's lifecycle, from planning to implementation and monitoring. • Ensure that the GAP addresses specific gender issues relevant to the project and establishes clear strategies for promoting gender equality. This includes identifying gender-specific needs and impacts, setting measurable targets, and outlining actions to address these needs. • Establish a robust and functional Grievance Mechanism (GM) that caters to both workers and affected communities. The GM should facilitate the documentation and resolution of grievances, particularly those related to Gender-Based Violence (GBV) and Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH). • Ensure that the GM is accessible and well-communicated. This involves providing clear guidelines and accessible reporting channels for GBV and SEA/SH incidents. The

Project Activities/ Type of Labor Risks	Key Labor Risks	Mitigation Measures
		<p>mechanism should emphasize timely documentation and reporting to maintain transparency and accountability. Protect the safety and privacy of victims by maintaining strict confidentiality throughout the grievance process.</p> <ul style="list-style-type: none"> • Conduct ongoing consultations and sensitization meetings with workers and affected communities regarding GBV and SEA/SH. These meetings should include information about the Liberia Decent Work Act as it pertains to project activities and GMs. • Regular consultations and sensitization sessions with workers and affected communities should be held to empower them with knowledge about their rights and inform them of the available grievance mechanisms. These sessions will clarify reporting procedures to facilitate open dialogue and understanding, while also promoting preventive strategies to foster a workplace culture of respect and dignity. • Provide clear and accessible reporting procedures to encourage open dialogue and understanding of GBV and SEA/SH issues. Ensure that workers and community members are aware of how to report incidents and the support available. • Develop and disseminate guidelines that explain how to report GBV and SEA/SH incidents. These guidelines should promote a culture of respect and transparency, and emphasize preventive measures to reduce the incidence of such issues. • Ensure that any person filing a GBV or SEA/SH complaint has access to confidential GM services. This is crucial for mitigating fears of reprisal or stigma associated with reporting such incidents. • Create and maintain confidential reporting channels that protect the identity of the complainant. Provide support services to

Project Activities/ Type of Labor Risks	Key Labor Risks	Mitigation Measures
		<p>address any concerns about retaliation or negative consequences for those who report incidents.</p> <ul style="list-style-type: none"> • Establish safe spaces for reporting GBV and SEA/SH incidents and support victims throughout the grievance process. • Designate secure and private areas where individuals can report incidents without fear of exposure. Offer support services that assist victims through the reporting and resolution process, including counseling and legal assistance if needed. • Provide training for GM personnel to handle cases of GBV and SEA/SH with empathy, impartiality, and professionalism. • Ensure that GM staff are well-trained in handling sensitive cases according to established protocols. The training should focus on supporting victims effectively, upholding their rights, and maintaining a high standard of professionalism in all interactions. • These elaborations should help in creating a comprehensive approach to addressing gender issues and supporting victims within the project’s framework.

4 BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

Below is an overview of the key aspects of the national labor law (the Decent Work Act of Liberia, 2015) taking into consideration terms and conditions of WB ESF ESS2 (Labor and working conditions, paragraph 11).

4.1 Recruitment

Sub-chapter D section 75 of the Act states, among other things, that all employers shall hire qualified Liberian workmen and employees available in country. The law also provides that it shall be unlawful to hire an alien employee unless and until there is no qualified Liberian capable of performing the required task. Furthermore, the law states that no employee shall be employed at a rate different from that paid to Liberia in similar positions with equal competence or length of service.

Also, Section 11.1 of the Act states that no employer shall employ an alien unless such alien is in possession of an employment permit issued by the Ministry of Labor.

4.2 Wages and Deductions

The amount and form of remuneration in Liberia is determined by the individual labor contract. Payment of wages is done on a monthly basis. The Labor Law of Liberia requires employers to pay wages that are due to an employee in cash, except where the employee agrees in writing to payment of wages by postal order, money order, check or lodgment at a financial institution to the credit of an account standing in the name of that employee or in the name of that employee and some other person or persons jointly.

Act sets out a minimum salary for every category of workers employed in the formal sector under a concession, industry, company business, etc.. The minimum wage in the formal sector for a worker/employee is US\$ 0.68 per hour or US\$ 5.50 per day. Domestic and/or casual worker/employee is entitled to a minimum wage of US\$ 0.43 per hour or US\$ 3.50 per day. The employers usually deduct the income tax and health and social insurance contributions automatically from the wages and transfer them to the Liberia Revenue Authority or appropriate and social authorities.

4.3 Working Hours and Breaks

Part V, Chapter 17, Sec. 17.1a of the Act states that the ordinary working hours shall be eight hours in any one day and forty-eight hours in any one week. The Act also requires employers to clearly display a notice showing the hours at which work begins and ends and the daily rest periods, in a readily accessible location in any workplace under their control.

4.4 Overtime Work

Section 17.5 of the Act allows overtime work. Any hour worked in excess of the ordinary working hours of eight hours per day is overtime. An employer may require an employee to work a maximum of five hours beyond ordinary hours of work in any week, and all work in excess of

ordinary hours shall be paid at a rate not less than fifty per cent above the normal rate for that work.

4.5 Meal Breaks

Section 17.7 of the Act requires an employer to give an employee who works continuously for more than five hours a meal interval of at least one continuous hour, for which time the employee shall be paid.

4.6 Daily Rest period

Section 17.9 of the Act requires an employer to allow an employee a daily rest period of at least twelve consecutive hours between ending and commencing work.

4.7 Leave

The right to annual leave is guaranteed to all employees under the Labor Law of Liberia. Chapter 18, Sec. 18.1 of the Act provides that any employee who works based on an individual labor contract shall benefit from the right for annual rest leave. Every employee is entitled to a minimum uninterrupted period of annual leave as follows:

- during During the first 12 months of continuous service with an employer, the number of working days in one week;
- during during the first 24 months of continuous service with an employer, the number of working days in two weeks;
- for For continuous service of 36 months, the number of working days in three weeks; and
- for For continuous service with the same employer for sixty 60 months and thereafter, the number of working days in four weeks. An employee who have has taken either of this annual leave shall receive their full remuneration as per the civil servant Standing Order and Decent Work Act.

These provisions are consistent across the Labor Law of Liberia (Chapter 18, Sec. 18.1), the Decent Work Act (Section 20.1), and the Civil Servant Standing Orders (Order 18.1).

Maternity Leave: Female employees are entitled to 14 weeks of maternity leave with full remuneration, divided as six weeks before and eight weeks after childbirth. This is mandated by the Decent Work Act (Section 20.3) and the Civil Servant Standing Orders (Order 18.3).

Paternity Leave: Male employees are entitled to five working days of paternity leave, provided they have completed at least 12 months of continuous service. This entitlement is outlined in the Decent Work Act (Section 20.4) and the Civil Servant Standing Orders (Order 18.3).

Sick Leave: Employees are entitled to up to 30 days of paid sick leave per year, upon presentation of a medical certificate. This provision is detailed in the Decent Work Act (Section 20.5) and the Civil Servant Standing Orders (Order 18.5).

Bereavement Leave: Employees are entitled to five days of paid leave for the death of an immediate family member. This is stipulated in the Decent Work Act (Section 20.6) and the Civil Servant Standing Orders (Order 18.6).

Additional Leave Provisions: The laws also provide for leave to care for others, ensuring that employees can fulfill family responsibilities without compromising their employment.

The right to annual leave is guaranteed to all employees under the Labor Law of Liberia. An employee who takes annual leave shall receive their full remuneration as per the Civil Servant Standing Order and Decent Work Act. The Act also provides for paid maternity and paternity leave, sick leave, bereavement leave, and leave to care for others.

Short-term and seasonal workers are not clearly covered in the Liberian Labor Law and those employees do not benefit from annual leave.

4.8 Labor Disputes

Sections 40.1 to 40.6 of the Decent Work Act contain provisions for resolution of labor disputes in Liberia. The Act has provisions in these sections that allows workers to resolve individual and collective disputes between the employer and the employee(s) over the terms and conditions of a labor agreement.

- Section 40.1 (Individual Disputes): Establishes that individual disputes should first be addressed through direct negotiation, and if unresolved, referred to the Ministry of Labor for mediation.
- Section 40.2 (Collective Disputes): Collective disputes should be resolved through negotiation and collective bargaining, with the option to refer to the Ministry for conciliation and arbitration if needed.
- Section 40.3 (Mediation): Allows either dispute party to request mediation from the Ministry, which will appoint a mediator to help reach a settlement.
- Section 40.4 (Arbitration): Details arbitration as a binding alternative if mediation fails, with the arbitrator's decision enforceable in court.
- Section 40.5 (Role of the Ministry of Labor): The Ministry is tasked with facilitating negotiations, mediating, and referring disputes to arbitration, ensuring fairness and impartiality.
- Section 40.6 (Enforcement): Ensures that decisions from mediation and arbitration are legally binding and enforceable, with penalties for non-compliance.

The general labor law reinforces these sections by advocating for fair treatment and resolution of labor disputes, ensuring employee rights are protected. Additionally, Civil Servant Standing Orders provide guidelines for disputes involving civil servants, complementing the Decent Work Act's provisions.

4.9 Sexual Harassment

Section 2.8 of the Decent Work Act contains provision for prohibition of sexual harassment in Liberia. The act defines sexual harassment as: i) sexual conduct which is unwelcome, unreasonable, or offensive to the recipient, and which occurs in circumstances where a person's rejection of, or submission to, such conduct is used explicitly or implicitly as a basis for a decision which affects that person's job; or ii) sexual conduct that creates an intimidating, hostile or humiliating working environment for the person that is subject to that conduct. According to the act, a person shall not directly or indirectly sexually harass a worker: i) in any employment practice; or ii) in the course of a person's employment.

This regulatory framework is supported by other laws and guidelines. The Labor Law of Liberia reinforces fair treatment and resolution of disputes, including those related to sexual harassment. The Civil Servant Standing Orders offer additional guidelines specifically for resolving disputes involving civil servants. Furthermore, Liberia's Constitution and international commitments ensure adherence to broader human rights standards against discrimination and harassment. The 2014 Domestic Violence Act also addresses sexual harassment, providing specific protections for victims in workplaces and educational institutions.

4.10 Nondiscrimination and equal opportunity

Section 2.7 of the Decent Work Act prohibits discrimination at the workplace. The law states among other things:

- a) No person shall discriminate against a person who works or who seeks to work in Liberia in an employment practice;
- b) No person shall discriminate against another in an employment practice because the person has exercised or attempted to exercise any of their rights in this Act; and
- c) Discrimination means to apply any distinction, exclusion or preference which has the effect, whether directly or indirectly, of nullifying or impairing equality of opportunity or treatment, including the provision of remuneration or other benefits.

In addition to the Decent Work Act, the following national laws and regulations support and reinforce nondiscrimination and equal opportunity in Liberia:

- a) Labor Law of Liberia: This law complements the Decent Work Act by supporting principles of fairness and equality in employment. It emphasizes equal opportunity and the fair treatment of employees, including the resolution of disputes related to discrimination.
- b) Civil Servant Standing Orders: These orders provide specific guidelines for addressing discrimination within the civil service, aligning with the broader nondiscrimination principles established in the Decent Work Act.
- c) Liberian Constitution: The Constitution enshrines fundamental human rights and prohibits discrimination in all forms. It reinforces the principles of equality and equal opportunity as foundational rights for all citizens.
- d) International Commitments: Liberia's adherence to international conventions and treaties further supports nondiscrimination and equal opportunity. These international agreements mandate the protection of workers from discrimination and promote fair treatment in the workplace.

These laws and regulations collectively ensure that individuals in Liberia are protected against discrimination and are provided with equal opportunities in the workplace, fostering a fair and inclusive work environment.

5 BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

The Decent Work Act, 2015 is the primary piece of legislation that provides the framework for occupational health and safety (OHS) in Liberia. Part VI of the Act, which covers OHA, is very extensive and covers most of the key requirements of paragraphs 24 to 30 of WB ESF ESS2. Objectives of the OHS legislation are generally in line with the objectives of WB ESF ESS2. Among others, the objectives are to:

- Provide secure safety, health and welfare of employees and other persons at work;
- Eliminate at their source, so far as is reasonably practicable, risks to the safety, health and welfare of employees and other persons at work;
- Ensure that the safety and health of members of the public are not exposed to risks arising from work or workplaces; and
- Provide for the involvement of workers, employers, and organizations representing those persons, in the formulation and implementation of safety, and health and welfare standards.

5.1 Employer's Obligations

Part VI, Chapter 25, of the Act provides requirements for employer's obligations. It covers general duties of employers, including: the duty to ensure, so far as is reasonably practicable, the safety and health at work of all workers they have engaged; the duty to provide and maintain plan and systems of work that are safe and without risks to health; and the duty to provide, in appropriate languages, such information, instruction, training and supervision as may be necessary to ensure the safety and health of workers they have engaged.

In accordance with the environmental regulations of the WB and the borrower, OHS is incorporated into the Contractor Environmental and Social Management Plan (CESMP). It is the responsibility of the contractor, during construction works, to ensure prevention of the spread of COVID-19 through adequate social distancing, wearing of the appropriate PPE, and hand washing at the project site. These measures are part of the CESMP prepared before the start of the Project.

Employer-employee occupational safety and health collaborations will be through the health and safety personnel (that should be at each work place), which empower the worker with the ability to manage the intended and unintended health and social consequences from the work being done. In addition, there will be a need for the creation of public awareness, which will further empower all persons in the workplace to safeguard their own health through training and workplace publicity-campaign (mainly through signage) to generate social consciousness of potential OHS hazards.

Even though OHS provisions in the Decent Work Act of Liberia are exhaustive and generally cover the objectives and requirements set out in WB ESF ESS2 paragraphs 24 to 30, implementation and enforcement of these provisions are generally weak within Liberia for several reasons, including the lack of capacity, logistics, and inadequate funding. The PCMU/PIU will,

therefore, need to ensure that all applicable provisions are implemented and contractually enforceable by ensuring appropriate clauses and provisions are included in all relevant contracts.

In addition to Part VI, Chapter 25 of the Decent Work Act of 2015, which outlines the obligations of employers regarding occupational health and safety (OHS), several other regulations and acts in Liberia contribute to the overall framework for ensuring worker safety and health. These include:

- a) Civil Servant Standing Orders: These provide specific guidelines for maintaining health and safety standards within the civil service sector, complementing the broader provisions of the Decent Work Act.
- b) Liberian Constitution: The Constitution upholds fundamental rights related to worker safety and non-discrimination, supporting the legal framework for OHS by guaranteeing a safe working environment.
- c) 2014 Domestic Violence Act: This Act addresses workplace safety concerning gender-based violence, including provisions to prevent sexual harassment and violence, thereby contributing to a safer work environment.
- d) Labor Law of Liberia: Reinforces the Decent Work Act's provisions on fair treatment and dispute resolution, including those related to occupational safety and health.
- e) Environmental Protection Agency (EPA) Regulations: These regulations provide specific guidelines for managing environmental and health impacts in workplaces, which support the overall OHS framework.
- f) Ministry of Labor Regulations: The Ministry issues directives and standards related to OHS compliance and enforcement in various industries, ensuring that health and safety requirements are met.
- g) Public Health Law: Addresses broader health concerns, including aspects that overlap with occupational health and safety, especially in preventing and managing health risks within workplaces.
- h) Contractor Environmental and Social Management Plan (C-ESMP): In alignment with World Bank standards, this plan incorporates OHS measures into construction projects, including COVID-19 prevention protocols.

These laws and regulations collectively form a comprehensive legal framework for occupational health and safety in Liberia, requiring effective implementation and enforcement to protect workers and ensure safe working conditions.

6 POLICIES AND PROCEDURES FOR MANAGEMENT OF LABOR ISSUES

This section sets out the mitigation measures that will be adopted by the project to address the risks mentioned in Section 3.2, including those relating to responding to the specific risks to workers such as mpox which is presently a greater concern than posed by COVID-19, as well as any unforeseen health risks that may arise in the future. It also covers the policies and procedures for management of forced labor, which consists of any work or services not voluntarily performed that is exacted from an individual under threat of force or penalty, and which will not be used in connection with the Project. Forced labor will not be permitted or used in any aspect of the project, and strict compliance measures will be in place to ensure worker rights are fully protected. Additionally, ongoing risk assessments will be conducted to monitor and respond promptly to any emerging health threats to ensure a safe working environment throughout the project lifecycle.

6.1 Terms of Employment: Direct Workers

The rights of direct workers will be ensured by the following:

- All project staff will be provided with an employment contract as per the requirements of Employment Decent Work Act of Liberia, 2015;
- Maximum working hours for staff will not exceed the maximum limit set in the Act, i.e., 48 hours a week;
- Equal training opportunities will be available to all staff working on the Project without discrimination, based on gender or otherwise, as specified in the Act;
- All project staff will be provided with health insurance, equivalent to that given by other government companies and institutions working in similar capacities;
- Any foreign party employed by the Project will have a valid work permit and a work visa while working in Liberia as required by the relevant laws; and
- All staff will be made aware of GM available for the staff as specified under this LMP, and will be provided with the necessary PPE required for their tasks, especially when monitoring construction sites, along with training on its correct usage.

To ensure enforcement, these provisions will be included in the employment contracts of all direct workers.

6.2 Terms and Conditions: Contracted Workers

The rights of contract workers will be ensured by the following:

- All contractors will be required to submit a list of workers to be employed for the project, along with proof of employment and signed copies of the Code of Conduct, to the PCMU/PIU.;
- Construction work can only commence once the following conditions are met:
 - Site specific plan (after risk assessment) appropriate for the level of the contractor's undertaken developed prior to the commencement of work;
 - Induction covering the risks and hazards of the contractor's undertaking for all workers once hired;

- Toolbox training completed by all staff employed by the contractor; and
- All required PPE is acquired by the contractor for use by all workers requiring PPE.
- An internal transparent and accountable system will be established within the company to tackle issues of sexual harassment, physical and psychological harassment and workplace bullying. Details of this system will be shared with PCMU/PIU prior to signing any contracts or agreements;
- The leave policy of the company will be shared and confirmed that it is in line with national laws and regulations;
- All foreign parties employed by all contractors/investors will have a valid work permit. The work permit details will be shared with PCMU/PIU;
- All vehicles used by any contractor/investor for the purpose of the Project will have valid registration, insurance and road worthiness; and
- All contracted staff will be made aware of the GM available for the staff specified under this LMP.

To ensure the enforcement of the provisions mentioned here for the contract workers by the contractor, the conditions highlighted here will be included in the contracts signed with all the contractors. If workers are allowed (or required) to work longer hours than normal because of the COVID-19 emergency, this will be documented alongside measures taken to protect such workers (e.g., mandatory rest breaks).

6.3 Working Conditions and Living Arrangements: Direct and Contracted Workers

The following working conditions and living arrangements will apply for all direct and contracted workers employed on the Project:

- Entry and exit from site/workplace will be strictly controlled;
- Separate male and female toilet facilities will be provided at all project offices and field/construction sites, and workers' camps.;
- Potable drinking water and handwashing facilities will be available at all project offices and field/construction sites, and workers' camps.;
- Working environment, along with any living accommodations provided by the contractor, must always be kept clean, hygienic and safe;
- All project offices and, where applicable, workers' accommodations will be maintained pest-free. Should any pests be detected, prompt pest control measures will be taken to ensure a clean, safe, and healthy environment at all times.
- Fire detection and firefighting equipment will be installed and readily available at all project offices, construction sites, and, where applicable, workers' accommodations to ensure safety and prompt response in case of emergencies.
- An emergency evacuation plan will be developed for all project offices and, where applicable, workers' accommodations. All staff will be thoroughly informed of the plan,

and regular simulation exercises will be conducted to ensure preparedness and effective response in case of an emergency.;

- Adequate safety signs will be installed at the work site giving clear direction. These will be provided in English in addition to the language of the workforce;
- Construction sites, including laydown areas and other relevant locations, will be properly demarcated and fenced, with warning signs displayed in English. Where applicable, workers' accommodations will also be fenced to ensure safety and security. ; and
- Work tasks will be rearranged or numbers of workers on the worksite will be reduced to allow social/physical distancing, or rotating workers through a 24-hour schedule.

Adequate PPE will be provided to workers, including:

- Facemasks, gloves, etc., if possible, to prevent COVID-19 spread;
- Enclosed shoes will be worn by all staff (safety-toed shoes are mandatory); and
- Safety harnesses will be provided (through contractors or the project directly) when working at heights at project sites, especially where work involves climbing and no other fall-restraint measures are available.

Worker accommodation, if required and relevant, will have the following provisions:

- Accommodation arrangements will be reviewed by the PIU in collaboration with the Ministry of Public Works (MPW), Ministry of Labor, and Ministry of Health to ensure that the accommodations meet health, safety, hygiene, and privacy standards, as outlined in the World Bank's ESF (ESS2 and ESS4) and Liberia's National Housing and Health Standards, to see if they are adequate and designed to reduce contact with the community;
- Male and Female workforce will be housed separately;
- Constant and reliable electricity supply will be made available. In addition, sufficient lighting and cooling systems will be established;
- Shower and toilet facilities will be available at the accommodation site, with a minimum ratio of 1 toilet/shower per 10 workers maintained to ensure sufficient access, particularly during peak times such as shift changes. Separate facilities will be provided for men and women to maintain privacy and hygiene;
- Toilet and drainage will be connected to local sewer system; where not available septic tanks will be used for treatment prior to disposal;
- Individual bedding will be provided to all workers;
- Storage space for individual belongings will be provided for all workers; and
- Designated locations for waste disposal with clearly marked bins will be established. and bins will be emptied daily to maintain cleanliness. The entire site will undergo daily cleaning. Secure locking mechanisms will be installed at all accommodations, and adequate lighting, particularly around toilet and shower facilities, will be provided to ensure safety, security, and convenience. .

6.4 Freedom from Forced or Compulsory Labor

To ensure compliance with Liberia's legal framework, international standards, and environmental regulations prohibiting forced or compulsory labor, the project will implement stringent measures at all levels, particularly focusing on primary supply workers involved in the procurement of solar panels. These measures are aligned with the World Bank's Environmental and Social Standard 2 (ESS2), Liberia's Decent Work Act of 2015, ILO Convention No. 29 on Forced Labor, Convention No. 105 on the Abolition of Forced Labor, and the Liberia Environmental Protection Agency (EPA) Guidelines, which set standards for labor conditions, environmental protection, and worker safety.

Contractors and suppliers will be rigorously screened to verify their adherence to these labor laws and environmental guidelines, ensuring that no forced or compulsory labor is present. This process will involve reviewing employment contracts, working conditions, and environmental compliance, with contractors required to submit regular reports demonstrating compliance with labor standards as outlined in ESS2, the Decent Work Act, ILO conventions, and EPA guidelines regarding the well-being of workers and the environment.

Specific conditions will be incorporated into the procurement process to ensure that suppliers, especially those involved in the procurement of solar panels, fully comply with national labor and environmental laws, including Liberia's Environmental Protection and Management Law (EPML). These requirements will be embedded in their contractual obligations, as mandated by ESS2, to uphold workers' rights and protect both labor and environmental standards. To maintain oversight, routine audits and unannounced inspections will be conducted at construction sites and throughout the supply chain. These inspections will assess labor and environmental conditions and may include interviews with workers to ensure that all labor is voluntary and that no instances of forced labor occur, in accordance with ILO standards and EPA guidelines.

In cases of non-compliance, penalties ranging from warnings to contract termination will be enforced, in line with ESS2, Liberia's labor laws, and EPA regulations. Breaches related to forced labor or environmental non-compliance will prompt immediate corrective actions. Furthermore, all workers, including those in the supply chain, will be educated on their rights and protections through training programs, and a confidential grievance mechanism, as required by ESS2 and the EPA's worker protection guidelines, will be established to allow workers to report any concerns regarding forced labor or environmental hazards without fear of retaliation.

Through these measures, the project will ensure that labor is performed voluntarily and ethically, particularly in relation to the procurement of solar panels, in full compliance with Liberia's Decent Work Act, ILO Conventions 29 and 105, the World Bank's ESS2, and Liberia's Environmental

Protection and Management Law (EPML), aligning with both national and international human rights and environmental standards.

6.5 Freedom from the worst forms of Child Labor

To ensure strict compliance with national and international standards, no person under the age of 18 will be employed by the project in any capacity, including by contractors, subcontractors, and primary suppliers. This requirement aligns with Liberia's Decent Work Act of 2015, which explicitly prohibits child labor and defines a child as anyone under the age of 18, as well as the Children's Law of Liberia, which further safeguards children from exploitation and hazardous work. The project also adheres to international labor standards, particularly the International Labor Organization (ILO) Convention No. 138 on Minimum Age and Convention No. 182 on the Worst Forms of Child Labor, both of which provide essential guidelines for protecting children's rights in the workplace.

To implement these measures, all contractors and subcontractors will be required to establish a stringent age verification process for all workers. This process will include verifying valid identification documents, such as national IDs, birth certificates, or passports, prior to employment. Contractors will be obliged to maintain comprehensive employment records, including proof of age for all employees, and these records must be submitted regularly to the PIU for review and monitoring. The PIU will carry out periodic audits and site inspections to ensure full compliance with these requirements, as mandated by Liberian law and the World Bank's Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions, which strictly prohibits child labor in any project financed by the Bank.

Additionally, contractors will be required to submit periodic compliance reports to the PIU, confirming that all workers have undergone age verification and that accurate records are being maintained. Non-compliance with these provisions will result in penalties, including contract termination, in accordance with the enforcement mechanisms outlined in the Decent Work Act and World Bank guidelines.

To ensure enforcement, these provisions will be included in the employment contracts of workers.

6.6 Employment rights and obligations

All workers hired under the Project, whether direct, contracted or sub-contracted, will be employed based on the principles of non-discrimination.

Without limiting the scope of the preceding provision, all persons who work or who seek to work in Liberia are entitled to enjoy and to exercise the rights and protections conferred by the Decent Work Act, 2015 irrespective of:

- Race, tribe, indigenous group, language, color, descent, national, social or ethnic extraction or origin, economic status, community or occupation;
- Immigrant or temporary resident status;

- Sex, gender identity or sexual orientation;
- Marital status or family responsibilities; previous, current or future pregnancy or breastfeeding;
- Political affiliation or opinion, or ideological conviction;
- Physical or mental disability; health status including HIV or AIDS status, whether actual or perceived; and
- Irrelevant criminal record, acquittal of a crime or dismissal of a criminal prosecution against them; or personal association with someone possessing or perceived to possess one or more of these attributes.

The Decent Work Act of 2015 is reinforced by several key laws and regulations: the Liberian Constitution, which upholds fundamental rights and anti-discrimination principles; the Labor Law of Liberia and Anti-Discrimination Law, which support equal opportunity and fair treatment; the Equal Opportunity Act, which ensures nondiscriminatory practices in employment; the Disability Rights Act, which provides protections for individuals with disabilities; the Gender Equality Law, which addresses gender-based discrimination and family responsibilities; and the HIV and AIDS Prevention and Control Act, which safeguards against discrimination related to health status. Together, these legal instruments create a robust framework to ensure fair treatment and protection for all workers in Liberia. To ensure enforcement, these provisions will be included in the employment contracts of workers.

7 INSTITUTIONAL ARRANGEMENTS

To ensure successful management of project workers there is a need to clearly define roles and responsibilities of key players and stakeholders from the national to community level.

7.1 Implementation Labor Management procedures at the PCMU/PIU Level

The LMP for LESSAP-2 is designed to ensure compliance with national labor laws and World Bank standards, particularly the Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions. The RREA and LEC will be responsible for the implementation of the LMP through their respective Environmental and Social Units (E&S Unit for RREA and ESMU for LEC).

Both RREA and LEC, will ensure that labor management practices are in line with Liberia's Decent Work Act of 2015 and the World Bank's ESS2. Both agencies will have dedicated environmental and social safeguard teams that will work in collaboration with the Ministry of Labor to enforce labor standards across all project sites. This collaboration will involve routine labor inspections to assess working conditions, occupational health and safety, and ensure that child labor and forced labor laws are adhered to.

The Ministry of Labor will play a central role in conducting labor inspections, with a frequency of inspections scheduled quarterly or as needed based on project activities. These inspections will assess compliance with Liberia's labor laws, including proper use of protective equipment, adherence to working hours, and worker welfare. RREA's E&S Unit and LEC's ESMU will coordinate closely with the Ministry to ensure that these inspections are carried out in a timely and effective manner. The E&S Unit/ESMU will also conduct internal audits to monitor compliance with the LMP and report regularly to the PIU.

Contractors and subcontractors will be required to implement an age verification system to ensure that no person under the age of 18 is employed in the project. This will include verifying valid identification documents such as birth certificates, national IDs, or passports. Contractors will also be required to maintain detailed records of all employees, including proof of age and employment terms, which will be submitted to the PIU for review. These records will be regularly audited by the E&S Unit and the Ministry of Labor to ensure full compliance with labor laws and prevent child labor.

The LMP will provide workers with access to a Grievance Mechanism (GM), which will be actively monitored by the E&S Unit and the Ministry of Labor. Workers will be able to report any issues related to unfair treatment, unsafe working conditions, or labor law violations confidentially and without fear of retaliation. The grievance redress system will track complaints, and the E&S Unit will ensure that grievances are investigated and resolved in a timely manner. Regular reports on the resolution of grievances will be submitted to the PIU and the World Bank.

To ensure that labor management practices are implemented effectively, the E&S Unit/ ESMU at will organize training sessions for contractors, project staff, and relevant stakeholders on labor laws, occupational safety, and the LMP. These sessions will be conducted in collaboration with the Ministry of Labor to ensure consistency with national regulations. Training will cover the proper use of personal protective equipment (PPE), grievance mechanisms, and the roles and responsibilities of contractors and workers under the LMP.

All contractors will be required to submit labor compliance reports to the PIU, detailing their

adherence to the LMP, including age verification, working conditions, and grievance redress activities. The E&S Unit/ESMU will review these reports and take corrective actions as needed, ensuring full compliance with the LMP. These reports, along with the results of labor inspections and grievance resolutions, will be submitted to the World Bank as part of the project's semi-annual progress reports.

Through close collaboration with the Ministry of Labor and regular oversight by the E&S Unit/ESMU, LESSAP-2 will ensure the proper implementation of labor management procedures, protecting workers' rights and ensuring compliance with national labor laws and the World Bank's ESS2.

7.2 Implementation of Labor Management Procedures by Contractors

The contractors, in accordance with contract specific Labor Management Plans, will have primary responsibility for workplace health and safety, including: i) ensuring working conditions and management of workers relationship; ii) protecting the workforce; iii) establishing and operationalization of Workers' GM; iv) ensuring compliance to ESH requirements, v) ensuring contracted workers are protected; and vi) ensuring community workers involvement where needed and justified as set out in national and international standards. The project does not include Community workers, as defined by ESS2, Paragraph 34, which refers to volunteers contributing labor for community-driven initiatives or social safety net programs. Instead, the workers hired for this project from the nearby communities are classified as day laborers or contracted workers. Therefore, these individuals will receive appropriate training, and their participation will be documented to ensure compliance with labor management standards. Regular reporting will be conducted to maintain transparency and adherence to labor requirements throughout the project.. They will be required to respect guidelines provided in this LMP, implementation of which will be supervised by safeguards specialists at LEC and RREA. Regular employment reports (e.g., including names of staff, category, ages, gender, hours work and wages paid), and incident reports including grievances, will be submitted by contractors on a monthly basis or at shorter intervals as defined by specific ESMPs. The detailed approach is described in the following sub-sections.

The PCMU/PIU, under the direct supervision of the Project Director/Manager, will coordinate the engagement and management of project workers and designated staff such as the Environmental and Social Safeguard specialists for the following activities:

- Ensure that contractor(s) responsible for the civil works under the Project prepare and submit the OHS plan/policy to meet the requirements of national OHS regulations before works commence;
- Monitor regularly that the contractor(s) are meeting contractual obligations towards contracted and sub-contracted workers as included in the General Conditions of Contract in the World Bank Standard Bidding Documents, and in line with WB ESF ESS2 and Liberia's Decent Work Act, 2015;
- Monitor that OHS standards are met at work places in line with national occupational health and safety legislation and OHS Plan;
- Ensure that the workers for all contractors and subcontractors are aware of the GM; and

- Ensure that incidents and grievances are registered, reported and addressed properly by the appropriate party.

For project activities involving renovation/refurbishment and minor civil works, the contractor is expected to oversee labor and safety performance on a regular basis (daily) on behalf of the Employer.

Among other obligations required by the Decent Work Act, 2015 and the relevant WB ESF ESSs, contractors will be responsible for the following:

- Develop a Contractor's OHS Plan that meets the employer's requirement to incorporate requirements of WB ESF ESS2 and OHS provisions in the Decent Work Act, 2015 of Liberia prior to the commencement of work;
- Assign or employ a competent person responsible for the adoption and implementation of the OHS plan to the requirements of the Project;
- Ensure, so far as is reasonably practicable, the safety and health at work of all workers they have engaged;
- Provide and maintain systems of work that are safe and without risks to health;
- Maintain records of recruitment and employment process of contracted workers;
- Clearly communicate job descriptions and employment conditions to contracted workers;
- Develop a system for regular review and reporting of labor, and OHS performance on site;
- Develop and implement a GM that would record and address the grievances raised by the workers; and
- Deliver regular orientation and OHS training, and Code of Conduct trainings for all employees. Ensure comprehensive records of these sessions are maintained and regularly report on them to ensure accountability and compliance with labor management standards.

8 AGE OF EMPLOYMENT AND CHILD LABOR

The minimum age for employment on the Project will be in line with the requirements of the Decent Work Act, 2015, which specifies a higher age than that specified WB ESF ESS2 para. 17. Section 21.2 of the Act prohibits the employment of children under the age of 15 in full time employment. However, Sections 21.3 of the Act permits children under 15 years to be employed in light work on the basis that:

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

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

- Work which exposes children to physical, psychological or sexual abuse;

- Work under ground, under water, at dangerous heights or in confined spaces;
- Work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads;
- Work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health; and
- Work under particularly difficult conditions such as work for long hours or during the night, or work where the child is unreasonably confined to the premises of the employer.

A child over the minimum age but not less than 18 years may be employed by the Project provided conditions in paragraph 18 of WB ESF ESS2 are satisfied, and that no child over the minimum age and under the age of 18 will be employed or engaged in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.

Construction works are generally classified as hazardous activities. **Therefore, no person under the age of 18 will be employed or permitted to engage in any project -related activities.** activities. The contractor will be responsible to ensure those employed to engage in construction activities are 18 years or above. It is the contractor's responsibility to establish verifiable systems and procedures to implement this requirement.

Whenever it is brought to the attention of the employer of the presence of a person or persons below the minimum age of employment in the employ of the contractor, the employer may investigate immediately and, if proven, request the contractor to immediately terminate said person's contract, while paying all due benefits, and immediately remove them from site.

In addition to the Decent Work Act, Liberia's framework for child labor protection includes the Children's Law of Liberia and the Anti-Trafficking in Persons Act of 2012 further protect children from exploitation and trafficking. The Liberian Constitution guarantees protection from exploitation and forced labor, and Liberia adheres to international standards set by ILO Conventions No. 182 and No. 138, which mandate the elimination of the worst forms of child labor and establish minimum age requirements for employment. Together, these laws create a comprehensive framework to protect children from labor exploitation and ensure their well-being.⁹

TERMS AND CONDITIONS

The terms and conditions of employment applying to workers on the Project will largely depend on the nature of their employment contracts and will be governed by the Liberian Decent Work Act, 2015. The Civil Servant Standing Orders will also be relevant for public sector employees, while the Public Health Law will address health-related concerns. Compliance with the Employment of Children Act (Part II, Section 2.3) and the Anti-Trafficking in Persons Act of 2012 is essential for ensuring ethical labor practices. The Environmental Protection Agency (EPA) Regulations and Ministry of Labor Regulations will guide environmental and workplace safety standards.

These terms and conditions will be clearly mentioned in the written contracts for all type of workers, whether full-time or part-time, and will be made known to project workers prior to commencement of work. Detailed terms and conditions related to wages and hours of work are provided in Section 4 of this LMP.

10 GRIEVANCE MECHANISM

For the purpose of the LMP, a grievance redress committee (GRC) shall be established at the LEC/RREA with responsibility to investigate and resolve labor related complaints. The committee will comprise five (5) persons and the meeting of any three (3) persons will constitute a quorum. The GMGRC will be comprised the following persons:

- PIU/PCMU Coordinator (LEC or RREA);
- Representative of LEC/RREA Human Resource Office;
- Social Safeguard Staff (PIU/PCMU);
- Representative from contractor responsible for construction; and
- Representative from local community.

The GRC will be headed by the PIU/PCMU coordinator and the secretary to the GRC will be the social safeguard staff recruited at the PIU/PCMU. The procedure for reporting and resolving labor related complaints will be as follows:

- Aggrieved employee/consultant/worker(s) must first submit a complaint in writing or verbally to the LEC/RREA. The complaint will be recorded in a grievance log;
- Within 5 working days, the LEC/RREA must acknowledge receipt in writing of the grievance/complaint and deliver same to the relevant person/complainant;
- Within ten (10) working days of receiving the grievance, the complaint will be investigated and a written response will be delivered to the aggrieved employee/consultant/worker by the LEC/RREA; and
- Persons who are dissatisfied with decisions taken by the GRC will have the option to seek remedy at the appropriate judicial forum in Liberia.

The contractor(s) will be required to inform their workers, and sub-contractor(s), and display publicly on any work-site the information about the existing project GM which will include:

- A brief description of the GM mechanism and what it is used for;
- The process to send grievances such as comments/complaints forms via suggestion boxes, email, a telephone hotline with an indication of the email, telephone number, fax; mailing address; (For RREA: Email: info@rrealiberia.org, Phone Number: 0776309880) and (For LEC: Email <https://portal.lecliberia.com/>, Phones Number: 0555525444, 0771105109)
- The responsible unit and or person (staff of the contractor) for reviewing the submitted grievances;
- Stipulated timeframes to respond to grievances;
- Mechanisms for escalation of grievances to the next level of the GM process; and

- Persons who feel dissatisfied with a decision taken by the contractor will file a complaint to the LEC/RREA for review.

The Project will have several channels for complaints and grievances including email, phone calls, texts, blogs, toll free number and letter writing that will also be accessible to all workers and affected communities, including vulnerable groups. Information on the project GM will be made available to workers at all facilities, government offices (both national and county) and community level to ensure that all workers have adequate information on how to lodge a complaint and to whom a complaint should be directed. Anonymity will be assured when handling workers' grievances. A structure will be established for reviewing, responding and providing feedback on the issues raised.

The following actions will be used for managing complaints for LESSAP-2:

- Complaints will be sent to the GM focal point at the workplace by email, text, phone, letter or in person. The complaints will be collated onto a complaints form and logged into the register and reported using the format provided in the project SEP. The email address and phone number will be made available to the workers at signing the contract/recruitment;
- Complaints will be reviewed by the employer (LEC/RREA contractor) weekly upon receipt. The team will review the complaints and provide guidance on the course of action and ensure follow-up on previous complaints. Acknowledgement of the complaint and any preliminary investigation will take place within 5 working days of the GRC meeting. Feedback will be given to the complainant within 10 working days;
- For informal complaints, i.e., those raised through social media, print media or not formally lodged, the GRC will deliberate upon them to decide whether to investigate based on the substance and potential impact/reputational risk;
- If the complaint is referred to the main project GM and government's legal complaints structures, WB will be notified;
- Complaints regarding GBV/SEA/SH will be kept confidential, the name of the complainant will not be recorded, only the age and gender of the complainant, and whether a project worker was involved. The complaint will be sent directly to the project Manager who will immediately inform the WB;
- No disciplinary or legal action will be taken against anyone raising a complaint in good faith; and
- A monthly report of complaints resolution will be provided to the PCMU/PIU and the WB, as per the reporting requirement.

11 CONTRACTOR MANAGEMENT

The management of contractors will begin at the bidding phase, not just at the contracting phase. Clear requirements related to labor and OHS, as outlined in the World Bank 2018 Standard Procurement Documents and WB ESF ESS2, will be included in the bid documents. Bidders will be required to demonstrate their ability to comply with these standards, and the evaluation process will take these requirements into consideration to ensure sufficient budget allocation for implementing the necessary measures.

The contracts with selected contractors will further include detailed provisions related to labor and OHS, ensuring ongoing compliance. Contractors will be required to hire qualified and experienced OHS Specialists and prepare comprehensive OHS plans for managing labor and OHS issues. Additionally, contractors must develop TOR for recruiting the OHS Specialist, which will be subject to review and approval by the safeguard teams at LEC and RREA.

Contracts will also include specific penalties for non-compliance with labor and OHS requirements, ensuring that contractors understand the consequences of failing to meet the established standards. These penalties will provide clear enforcement mechanisms, ensuring accountability and adherence to the project's labor and safety regulations. By setting clear expectations and consequences early in the process, the project ensures that contractors are fully prepared and committed to meeting labor and OHS standards from the outset.

The PCMU/PIU will be responsible for monitoring the performance of contractor(s) in relation to contracted workers. In case a Supervision and Monitoring Consultant or Engineer is hired by LEC/RREA, the consultant may assume some of these responsibilities on behalf of the employer. The monitoring may include periodic audits, inspections of work sites, labor management records and reports compiled by contractors. Contractors' labor management records and reports may include: (a) a representative sample of employment contracts or arrangements between third parties and contracted workers; (b) records relating to grievances received and their resolution; (c) reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions; (d) records relating to incidents of non-compliance with national law; and (e) records of induction for newly hired employees, and training provided for contracted workers to explain labor and working conditions and OHS for the Project.

Contractors will be required to identify focal points and communication channels (for example, WhatsApp, SMS and email) within the company to address workers' concerns on an ongoing basis, and ensure that such channels are adequately resourced (for example, 24-hour staffing of the emergency response call line). Workers will not be victimized in any way for reporting a grievance.

As part of the process to select design/build contractors who will engage contracted workers, the PCMU/PIU (including safeguards staff) and/or the supervision consultant may review the following information:

- Business licenses, registrations, permits, and approvals;
- Documents relating to a labor management system, including OHS issues, for example, labor the prepared management procedures;
- Identification of labor management, safety, and health personnel, their qualifications, and certifications;
- Workers' certifications/permits/training to perform contracted work;
- Records of safety and health violations, and responses;
- Accident and fatality records and notifications to hierarchical authorities;
- Records of legally required worker benefits and proof of workers' enrollment in the related programs;
- Worker payroll records, including hours worked and pay received;
- Identification of safety committee members and records of meetings; and
- Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms reflecting WB ESF ESS2.

ANNEX 1: CONTRACTOR'S CODE OF CONDUCT

Implementing Environmental, Social Health and Safety (ESHS) and Occupational Health and Safety (OHS) Standards

Preventing Gender-Based Violence (GBV) and Violence Against Children (VAC)

(Name of contractor) acknowledges that adhering to environmental, social health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing gender-based violence (GBV) and violence against children (VAC) is important. All forms of GBV or VAC are unacceptable, be it on the work site, the work site surroundings, at worker's camps, or the surrounding communities.

The company considers that failure to follow ESHS and OHS standards, or to partake in GBV or VAC activities, constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit GBV or VAC may be pursued if appropriate.

(Name of contractor) agrees that while working on the project every employee will:

- Attend and actively participate in training courses related to ESHS, OHS, HIV/AIDS, GBV and VAC as requested by employer.
- Shall wear personal protective equipment (PPE), in the correct prescribed manner, at all times when at the work site or engaged in project related activities.
- Take all practical steps to implement the organization's environmental and social management plan (CESMP).
- Adhere to a zero-alcohol policy during work activities, and refrain from the use of illegal substances at all times.
- Consent to a police background check.
- Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
- Not engage in sexual harassment—for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior (e.g., looking somebody up and down; kissing, howling or smacking sounds, hanging around somebody, whistling and catcalls, giving personal gifts, making comments about somebody's sex life, etc.).
- Not engage in sexual favors—for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.

- Unless there is the full consent by all parties involved, every worker shall not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
- Consider reporting through the GM (Grievance Redress Mechanism) or to the manager any suspected or actual GBV or VAC by a fellow worker, whether employed by my employer or not, or any breaches of this Code of Conduct..
-

Quality of products and services

(Name of the contractor) expects that products and services provided by each sub-Contractor will be of the highest quality and will be fairly and reasonably priced so that (Name of the contractor) customers are served with the best value. In addition to any specific requirements in the agreement with (Name of the contractor), products and services will meet or exceed applicable government standards, including environmental and safety standards.

Consent is defined as the informed choice underlying an individual’s free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained through the use of threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the WB considers that consent cannot be given by children under the age of 18, even in the event that national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

Health and Safety

(Name of the contractor) is dedicated to providing safe, injury-free working conditions and a healthy work environment. Compliance with this commitment is a condition of any sub-Contractor engagement with (Name of the contractor).

Workplace safety

Each Sub-Contractor is responsible for ensuring that its Representatives complete all necessary safety training and per formwork in conformance with all applicable safety rules, laws, standards and procedures and for complying with and enforcing any additional (Name of the contractor) safety policies and procedures communicated to Sub-Contractor.

Reporting injuries, damage and unsafe conditions

In addition to any other legal reporting requirements, (Name of the contractor) and each Contractor must immediately report any occupational injuries, unsafe conditions or practices and damage to property occurring as a result of the (Name of the contractor)/Sub-Contractor or its Representative’s activities to REG or any deserved entity.

Alcohol and drug use

(Name of the contractor)'s commitment to providing a healthy and safe working environment is compromised by the consumption of alcohol and illegal drugs. While performing work for (Name of the contractor), Employees, Sub-Contractors and Representatives must not consume, use or be impaired by alcohol or illegal drugs or be under the influence of prescription drugs that impair a person's ability to perform work in a safe and efficient manner.

Workplace violence

Acts or threats of physical violence, intimidation and harassment will not be tolerated. Engaging in violence or threatening or intimidating behavior may result in termination of the contract with (Name of the contractor) or removal of the Representative from (Name of the contractor) property, as deemed appropriate by (Name of the contractor).

The Environment

(Name of Contractor) is committed to conducting its business in an environmentally responsible manner. (Name of Contractor) and Representatives will comply with all applicable environmental laws and regulations and operate in a way that minimize the negative environmental impact of the products and services.

Ethics

(Name of Contractor) must operate within the highest standards of ethical conduct when dealing with REG, Representatives, REG employees, customers and the public. (Name of Contractor) will ensure that its actions, and those of its Representatives, comply with the letter and spirit of this Code.

Anti-corruption

(Name of contractor) and Representatives are committed to zero tolerance against corruption and shall not engage in any form of bribery, extortion, embezzlement or other corrupt practices.

Fair competition

When conducting works (Name of Contractor) and Representatives shall uphold fair standards in recruiting and competition.

Confidentiality

Confidential information includes information that is not known by the public and that may be harmful to the organization, its employees or its customers if disclosed. (Name of the Contractor) is committed to safeguarding and protecting its own confidential information and the personal information of its customers and employees. Sub-Contractor must maintain the confidentiality of information entrusted to it in accordance with its agreements with (Name of the Company) and applicable law. The obligation to protect (Name of the Company)'s confidential information continues even after the business relationship with (Name of the Company) ends.

Updates to Code and Disclaimer

(Name of the Contractor) reserves the right to amend and modify this Contractor Code of Conduct at its discretion. The provisions of the Code are not intended to change any obligations set forth in the Contractor's agreement with REG and in the event of any conflict, the terms in the agreement with REG will prevail.

ANNEX 2: UNIFIED CODE OF CONDUCT FOR ALL WORKERS —DIRECT, CONTRACTED AND SPECIALIZED

Implementing Environmental, Social Health and Safety (ESHS) and Occupational Health and Safety (OHS) Standards

Preventing Gender -Based Violence (GBV) and Violence Against Children (VAC)

Unified Code of Conduct for All Project Workers

This Code of Conduct is developed to apply to all workers, including direct workers, contracted workers, and those in specialized roles such as electrical line workers. The Code sets clear expectations for adhering to Environmental, Social, Health, and Safety (ESHS) standards, Occupational Health and Safety (OHS) requirements, and preventing unethical behaviors such as Gender-Based Violence (GBV), Sexual Harassment (SH), and Violence Against Children (VAC). The Code is aligned with the World Bank’s Environmental and Social Framework (ESF) , particularly ESS2 on Labor and Working Conditions, and the laws and guidelines of the Government of Liberia.

By working on this project, I acknowledge my responsibility to follow this Code and understand that non-compliance may result in disciplinary action, including termination or legal consequences.

Core Principles of the Code

1. Commitment to Environmental, Social, Health, and Safety (ESHS) Standards

- I will comply with all ESHS guidelines, including the contractor's Environmental and Social Management Plan (CESMP).
- I will actively contribute to minimizing environmental and social impacts while ensuring that health and safety protocols are followed.
- I will adhere to the Occupational Health and Safety (OHS) management plan to ensure a safe working environment for myself and my colleagues.
- I will wear personal protective equipment (PPE) as required and prescribed for my tasks, especially when on-site or engaging in project-related activities.

2. Zero Tolerance for Gender-Based Violence (GBV), Sexual Harassment (SH), and Violence Against Children (VAC)

- All forms of GBV, SH, and VAC are strictly prohibited. I understand that engaging in these behaviors, whether at the worksite, in the worker’s camp, or within the surrounding community, constitutes gross misconduct.
- I will treat women, men, and children (persons under the age of 18) with respect, regardless of sex, race, ethnicity, religion, disability, or other status.
- I will not participate in any inappropriate language or behavior, including harassment, abusive or sexually provocative language, or culturally inappropriate actions towards women, children, or men.
- I will not engage in any form of sexual contact or activity with children or engage in grooming behavior. I understand that mistaken belief about a child’s age is not a defense, and that consent from a child is never acceptable.

- I will not solicit or engage in sexual favors in exchange for work benefits or any other form of advantage.

Respect for Consent and Non-Consensual Activities

- I will not engage in sexual interactions with coworkers or community members without full, informed, and voluntary consent. This includes relationships where benefits or favors (monetary or non-monetary) are exchanged for sexual activities, which will be considered non-consensual under this Code.

3. Commitment to Ethical Conduct

- I will not engage in theft, bribery, or any other form of unethical behavior.
- I will ensure the proper use and maintenance of site materials and property.
- I will follow the principles of honesty, integrity, and mutual respect in all work activities and interactions.
- I will not accept or solicit bribes or advantages in exchange for providing or receiving benefits related to the project.
- I will not use my employment position for undeserved personal gains or gains for others.

4. Protecting and Respecting Children

- I will refrain from hiring children for inappropriate labor and will report any cases of child labor.
- I will avoid unsupervised contact with children and ensure another adult is present when working near children, where possible. When photographing or filming a child for work purposes, I will: Obtain informed consent from the child and their guardian. Ensure images portray children in a dignified and respectful manner, with no vulnerable or inappropriate representations.

Reporting and Accountability

- I understand that if I witness or suspect any form of GBV, SH, VAC, or unethical practices, I am encouraged to report it through the Grievance Redress Mechanism (GRM) or to my manager. I will maintain confidentiality to protect the privacy of those involved.
- I will actively participate in training courses on ESHS, OHS, GBV, SH, and VAC prevention provided by my employer.

Commitment to Occupational Health and Safety

- I will adhere to all OHS guidelines and ensure my actions do not endanger myself or others
- I will avoid the consumption of alcohol or illegal substances during work hours and refrain from their use at all times while on project sites.

Sanctions for Violations

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

- Informal or formal warnings,
- Mandatory additional training,

- Deduction from salary,
- Loss of pay,
- Suspension of employment (with or without pay),
- Termination of employment,
- Reporting to law enforcement authorities.

Acknowledgment of Responsibilities

I understand that it is my responsibility to ensure compliance with this Code of Conduct. **By** signing this document, I acknowledge that I have read, understand, and agree to comply with the standards outlined herein. I understand that failure to adhere to these standards may result in disciplinary actions, including the termination of my employment.

Signature:

Printed Name:

Title:

Date: