



400/330kV WAPP GHANA - CÔTE D'IVOIRE INTERCONNECTION REINFORCEMENT PROJECT Feasibility Study & Line Route and Environmental and Social Studies



FINAL LABOUR MANAGEMENT PLAN (LMP) *Ghana*

January 2026

**400/330 KV CÔTE D'IVOIRE – GHANA INTERCONNECTION
REINFORCEMENT PROJECT**

LABOUR MANAGEMENT PLAN

January, 2026

EXECUTIVE SUMMARY

The Labor Management Plan (LMP) has been developed to manage labor risks during the implementation of the project. The LMP is in line with national requirements as well as the objectives of the World Bank's Environmental and Social Framework, specifically objectives of Environmental and Social Standard 2: Labor and Working Conditions (ESS2) and Standard 4: Community Health and Safety (ESS4). The Project's Environmental and Social Impact Assessment identified potential risks and impacts associated with Project implementation, associated with workers as well as community health and safety.

The Labour Management Plan (LMP) applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers.

The LMP is applicable, as per ESS2 to the Project in the following manner:

- People employed or engaged directly by the Contractor including government officials/officers deputed to work specifically in relation to the Program;
- People employed or engaged by contractors to perform work related to the core function of the program, regardless of location;
- People employed or engaged by the Contractor's primary suppliers.

The LMP applies to all Project workers, including full-time, part-time, temporary, seasonal, and migrant workers. It covers direct workers, contracted workers, and primary supply workers.

- Direct workers are employed directly by the Contractor and have specific control over their work, working conditions, and treatment. They are divided into three units: the PMU, Program-based Staffs, and Permanent Staffs. They work for a fixed contract period of not more than 1 year, renewable based on satisfactory services. Consultants work for short-term periods of up to six months.
- Contracted workers are employed by a third party to perform work related to the project's core functions. They are hired by the Contractor based on their skills and project needs. The PMU may employ contractors who will hire contracted workers. Sub-contractors may also be recruited to supply laborers. The LMP requires adherence to national laws, World Bank policies, and specific guidelines related to COVID-19. Contracted workers are eligible to work for a contract period fixed by the PMU and can be renewed if needed.
- Primary supply workers are employed by primary suppliers providing goods and materials to the project. The PMU ensures that child labor and forced labor are not involved. Their tenure service is based on the supplies procured.

In summary, the main labor risks associated with the program are related to safety, labor influx, and potential gender-based violence.

- **Safety:** Hazardous work environment and accident risks are addressed through contractor training and adherence to safety regulations.
- **Labor Influx:** The program will create jobs and may attract workers from outside the area. Measures are in place to manage this influx and mitigate potential risks like communicable diseases and gender-based violence.
- **Gender-Based Violence:** Construction workers, especially those away from home, may engage in inappropriate behavior. Measures are being implemented to prevent and address such issues.

Additional risks, such as child labor and forced labor, are considered negligible and are managed through existing national laws and regulations.

Occupational Health and Safety (OHS) measures in Ghana are essential not only for protecting workers but also for safeguarding the general public who may be exposed to project activities during construction and operation.

OHS measures in Ghana are governed by various laws, regulations, guidelines, and standards. These include the Factory, Offices, and Shops Act, Labour Act, Mining Regulations, Occupational Health and Safety Policy, Environmental Protection Agency Act, Construction Regulations, and Factories (Electricity) Regulations.

In addition to laws and regulations, OHS in Ghana is guided by various guidelines, standards, and codes of practice established by governmental agencies, international organizations, and industry associations.

These laws, regulations, guidelines, and standards provide a comprehensive framework for promoting workplace safety and health in Ghana. They address various aspects of OHS, including hazard identification and control, occupational hygiene, ergonomics, accident prevention, medical surveillance, health promotion, and environmental protection.

By adhering to these provisions, employers, workers, and regulatory authorities can contribute to creating safe and healthy workplaces and protecting the well-being of both workers and the general public.

The Project Management Unit (PMU) has the overall responsibility to oversee the implementation of the LMP and ensure contractor compliance. Specific responsibilities include: Overseeing contractor compliance, Reviewing records:, Requiring remedial actions:, Reporting to the World Bank.

The project will take initiatives to raise awareness among communities on relevant issues, such as labor standards and gender-based violence. This will contribute to effective stakeholder participation.

Decisions regarding employment or treatment of project workers must not be based on personal characteristics unrelated to job requirements. Employment will be based on these principles, ensuring no discrimination in any aspect of the employment relationship. Forced labor is strictly prohibited, and any practices that could be considered forced labor are listed. Contractors will maintain labor relations through

a code of conduct, address gender-based violence through training and awareness-raising, and cooperate with law enforcement agencies. Child labor is prohibited, and adolescents must meet specific requirements to work. Contractors must comply with labor laws regarding wages, hours of work, leave entitlements, and other benefits. Employees have the right to join and form organizations for labor representation.

Contractors must have a grievance procedure in place to address individual and collective grievances. The project proponent will establish a referral mechanism for survivors of gender-based violence. The project proponent will require contractors to monitor, keep records, and report on labor management terms and conditions.

Overall, the LMP emphasizes the importance of responsible labor practices, occupational health and safety, and addressing potential social and environmental impacts associated with the project.

The Labour Management Plan (LMP) for the Ghana–Côte d'Ivoire Interconnection Reinforcement Project and the Awudua–Dunkwa Transmission Line Project provides a comprehensive framework for managing labour, working conditions, and occupational health and safety (OHS) throughout project implementation. Developed in line with Ghanaian labour legislation and the World Bank's Environmental and Social Standards—particularly ESS2 (Labour and Working Conditions) and ESS4 (Community Health and Safety)—the LMP ensures that all categories of project workers are protected and that labour-related risks are effectively mitigated.

The LMP applies to direct workers, contracted workers, primary supply workers, and any potential community workers. It sets out clear requirements for fair recruitment, written contracts, equal opportunity, nondiscrimination, and the prohibition of child labour, forced labour, and human trafficking. It further outlines roles and responsibilities across GRIDCo, the Project Management Unit (PMU), supervising consultants, contractors, and relevant national authorities for ensuring compliance with labour and OHS requirements.

Key labour risks identified include wage violations, discrimination, gender-based violence/sexual exploitation and abuse/sexual harassment (GBV/SEA/SH), trafficking in persons, labour influx, and hazardous working conditions associated with transmission line construction. The LMP provides targeted mitigation measures including mandatory age verification, ethical recruitment, enforcement of the Code of Conduct, worker and community sensitisation, stringent contractor OHS obligations, and a zero-tolerance policy for GBV/SEA/SH and trafficking.

GRIDCo's dedicated HSE Unit and the PMU will oversee implementation of the LMP through regular inspections, audits, monitoring of contractors, and verification of compliance with OHS standards and the World Bank's Environmental, Health and Safety Guidelines (EHSGs). Contractors are required to maintain detailed labour records, provide PPE, conduct safety training, and report incidents and grievances. A multi-tiered Grievance Redress Mechanism (GRM) is established for all workers, complemented by survivor-

centred procedures for reporting and managing GBV/SEA/SH cases in collaboration with DOVVSU and accredited service providers.

Monitoring indicators and reporting procedures including monthly contractor submissions, quarterly PMU reports to the World Bank, and independent annual reviews ensure continuous oversight of labour practices across the project. Measures are also in place to monitor primary suppliers to prevent child or forced labour within the supply chain.

Overall, this LMP provides a robust and enforceable system for safeguarding worker rights, promoting safe and equitable working conditions, preventing social risks, and ensuring that labour management practices align with national laws, international standards, and the World Bank's ESS2 and ESS4 requirements.

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1 INTRODUCTION

1.1 Background

The Ghana-Cote d'Ivoire Interconnection Reinforcement Project is a critical infrastructure initiative aimed at improving the transmission of electricity between Ghana and Cote d'Ivoire.

World Bank's Environmental and Social Standard 2 (ESS 2) on Labor and Working Conditions emphasizes the importance of job creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Creating strong relationships between workers and managers is essential to project success, and treating workers fairly by providing them with safe and healthy working conditions will increase the development benefits of a project.

The Labor Management Plan (LMP) has been developed in compliance with ESS 2 to manage labor risks during the implementation of the project. The LMP is in line with national requirements as well as the objectives of the World Bank's Environmental and Social Framework, specifically objectives of Environmental and Social Standard 2: Labor and Working Conditions (ESS2) and Standard 4: Community Health and Safety (ESS4). The Project's Environmental and Social Impact Assessment identified potential risks and impacts associated with Project implementation, associated with workers as well as community health and safety.

1.2 Project overview

The Ghana Grid Company Limited (GRIDCo) proposes to construct, operate, and maintain an approximately 125km high voltage 400/330kV transmission line facility to augment energy supply to meet the industrial power demand in Ghana and West Africa. The high voltage transmission line is starting from Bingerville in Cote d'Ivoire to Dunkwa-on-Offin in Ghana in a project dubbed '400/330 kV Cote d'Ivoire – Ghana Interconnection Reinforcement Project'. Under the provisions of the Ghana Environmental Assessment Regulations, 1999 (LI 1652), the erection of power transmission line under "Power Generation and Transmission Projects" are categorized under undertakings for which an Environmental Permit is mandatory. Based on project registration in August 2021, the Environmental Protection Agency (EPA) directed GRIDCo to undertake the ESIA Study.

The proposed high voltage line project will transverse Upper Denkyira East, Wassa Amenfi East, Wassa Amenfi West, Aowin Municipal, and Wassa Amenfi Central Districts in the Central, Western, and Western North Regions within the., The transmission line will be built within a 40 m corridor width over a distance of approximately 125 km. Within the 40m right of way, there are no identified archeological or environmentally sensitive sites. The project from the Ghana-Cote d'Ivoire border (Omanpe) may be referred to as "linear," terminating at a proposed substation at Bibianiha near Dunkwa-on-Offin.

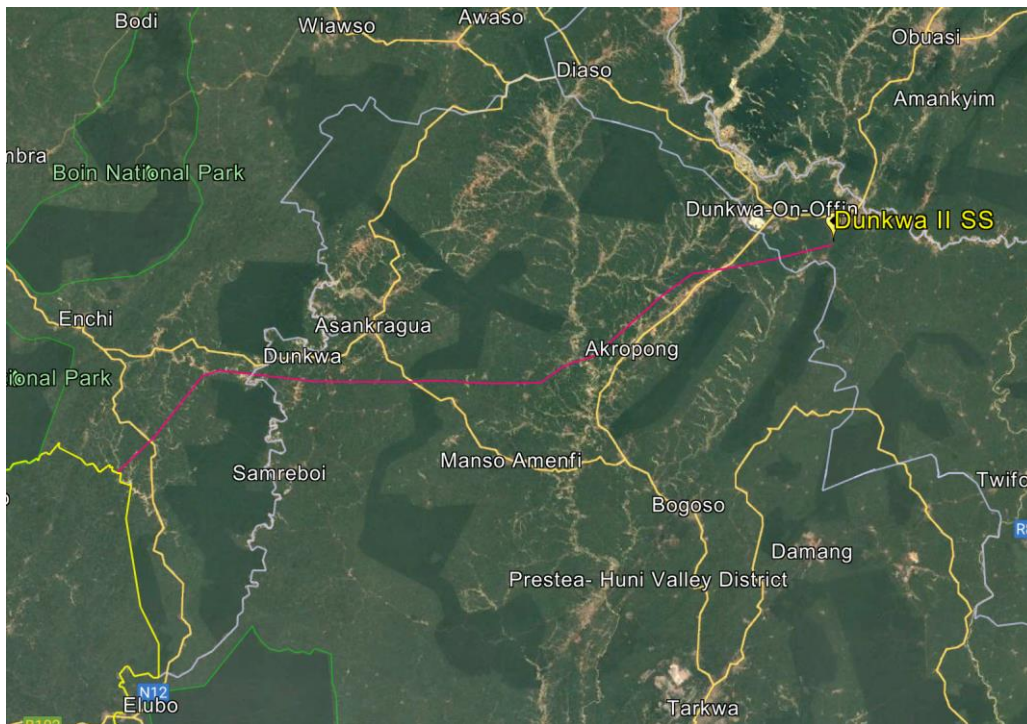


Figure 1 Ghanaian corridor section

The Bibianiha – Omanpe transmission corridor will have a “transmission line Right of Way” covering the area extending over a distance of twenty (20) metres on either side from the axis of the transmission line . This project is considered as a ‘linear’ project. A 40-meter Right-of-Way (RoW) will be acquired for the project, requiring approximately 500 hectares of land. The acquisition will be managed by GRIDCo in collaboration with the Lands Commission, ensuring that affected properties are compensated. The construction phase will involve activities such as geotechnical investigations, tower spotting, assembling and the erection of 320 pylons across the designated regions. The project is expected to employ about 150 persons, working in various segments of the transmission line at the same time.

Temporary employment opportunities will be provided for up to 150 Ghanaians and foreigners during the construction phase, particularly in areas such as transportation, electrical work, and civil and mechanical works. Indirectly, food vendors and services providers in the informal sector are likely to experience patronage of their services.

1.3 Objectives of Labor Management Plan

The LMP has been prepared as a stand-alone document, part of other environmental and social management documents. The LMP is a living document, which is initiated early in project preparation, and is reviewed and updated throughout development and implementation of the project.

The objectives of Labor Management Plan are:

- To promote safety and health at work.

- To promote the fair treatment, nondiscrimination and equal opportunity of project workers.
- To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.
- To prevent the use of all forms of forced labor and child labor.¹
- To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- To provide project workers with accessible means to raise workplace concerns.

2 OVERVIEW OF LABOUR USE ON THE PROJECT

The LMP applies to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers. The LMP is applicable, as per ESS2 to the Project in the following manner:

- **Direct Workers:** People employed or engaged directly by the Project including government officials/officers deputed to work specifically in relation to the Program;
- **Contracted Workers-** People employed or engaged by contractors to perform work related to the core function of the program, regardless of location.
- **Primary Supplier Workers-** People employed or engaged by the Contractor's primary suppliers.
- **Community Workers:** Community labor deployed under Community Driven Development and Safety Net projects as well as during targeted assistance in programs in Fragile, Conflict and Violent situations

2.1 Labour Requirements under the Project

Direct Workers: A "direct worker" is a worker with whom the Program has a directly contracted employment relationship and specific control over the work, working conditions, and treatment. These include government workers working directly on the project full or part time. and those who seconded to work on the project. Direct workers would likely include project management staff at GRIDCo and WAPP and those who will be employed to constitute the PIU and PCU, who will be directly involved in day-to-day management and monitoring of project. The requirements of paragraphs 9 to 30 of ESS2 will apply to direct workers. Where these workers are government civil servants, whether full-time or part-time, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project.

Where government civil servants are working in connection with the project, whether full-time or part-time, they will remain subject to the support staff who are working on contractual bases as part of the programme management unit to ensure that standards are followed strictly. If any terms and conditions of their existing, public sector employment agreement or arrangement unless there has been an effective legal transfer of their employment or engagement to the project.

Direct workers will be divided into three (03) major units as follows: the Project Management Unit (PMU); Program-based Staffs and Permanent Staffs. The PMU will employ consultants and support staff who are working on contractual bases as part of the Program Management Unit (PMU). Terms and conditions of these consultants are guided by the National Labour Law. The consultants will be engaged by the Program to undertake short period assignments as necessary. These are consultants guided by specific contractual agreements between them and the Contractor.

Direct workers are eligible to work for a fixed contract period of not more than 1 year. Contracts will be renewed for another/ next year based on satisfactory services. Consultants will be engaged under a short-term period of not more than six months and the labour requirement including the time schedule and deliverables are stipulated in their respective contracts.

Contracted Workers: A “contracted worker” is a worker employed or engaged by a third party to perform work or provide services related to the core functions of the project, where the third-party exercises control over the work, working conditions, and treatment of the project worker. Contracted workers include employees of Consultants and Project Contractors and sub contractors, including those who will be procured to work on the Interconnector and the Awudua-Dunkwa Transmission Lines. These works Contractors may also engage sub-contractors or employ workers to implement aspects of civil works such as mounting of towers and stringing of lines. Sub-contracts of activities could be occasioned under specific terms and conditions subject to be renewed depending on satisfactory performance and based on needs. The requirements of paragraphs 9 to 33 of ESS2 will apply to contracted workers,

Contracted workers are eligible to work for a contract period fixed by the PMU, and then recruited by the Contractor. Their contracts will be renewed, if required, based on satisfactory services.

Primary Supply Workers: A “primary supply worker” is a worker employed or engaged by a primary supplier, providing goods and materials to the project, over whom a primary supplier exercises control for the work, working conditions, and treatment of the person. Both foreign and local suppliers will participate in this project mainly in the supply of equipment, cables, tower members and equipment for the transmission line works. These entities will constitute primary suppliers under the Project and all their workers involved in the supply chain will be required to adhere to the provisions of this LMP. It will be monitored to ensure that no children are recruited and supplied as workers and that the workers are not subject to “forced labor”. These requirements of ESS2 together with OHS and other requirements for ensuring a safe working environment are relevant to the extent that the GRIDCo and WAPP can exercise control over them.

Based on the requirement in every component, primary supply workers will be recruited by the suppliers as required. They will ensure (and monitored periodically by the PMU) that no children below 18 years are recruited and used as as workers. Furthermore, they will be monitored like above that these workers are not subject to ‘forced labor’ in any manner. The PMU will take action as prescribed in the contract/ agreement following the LMP in the event of breaches of the requirements of ESS2. Their tenure service will be based on supplies as procured.

Community Workers: Community Labor consists of inhabitants of community who offer services under CDD/Safety net projects or are employed to provide targeted assistance during fragile or conflict situations.

The project is not anticipated to use community labor. If community labor engaged, the requirements of paragraphs 34 to 38 of ESS2 will apply to community workers in a manner that reflects and is proportionate to the nature and scope of the project, the specific project activities in which the community workers are engaged, and the nature of the potential risks and impacts to community workers

2.2 Timing of Labor Requirements

The LMP will be used throughout the project and workers with active employment or contract offers will be subjected to the terms and conditions of the LMP.

Table 1: Estimated Number of Project Workers by Labour Category

Labour Category	Description	Estimated number of workers
Direct Workers (including civil/public servants, PMU staff, consultants)	GRIDCo and WAPP staff seconded to the project, PMU technical officers, safeguards staff, engineers, administrative staff, and short-term consultants	35-50 workers
Contracted Workers	Workers engaged by the EPC contractors and subcontractors for civil works, tower erection, stringing, transport, security, and related activities	120-150 workers
Primary Supply Workers	Workers employed by suppliers of towers, conductors, insulators, and other major materials. Includes factory production staff and logistics handlers within suppliers' control	40-60 workers
Community Workers (if required)	Community labour for very minor support tasks (e.g., vegetation clearing assistance). <i>Not anticipated for this project but included for completeness</i>	0 not anticipated

3 BRIEF OVERVIEW OF LABOUR LEGISLATIONS

3.1 World Bank Environmental and Social Framework

The Labor Management Procedure for this project is based on three out of the ten Environmental and Social Standards (ESSs) under the Environmental and Social Framework (ESF). These are:

ESS 2: Labor and Working Conditions

This standard recognizes the importance of employment creation and income generation in the pursuit of poverty reduction and inclusive economic growth. Borrowers can promote sound worker-management relationships and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. The ESS 2 aims to create an enabling environment where labor rights are respected, workers are treated with dignity and respect, and workplaces are safe, inclusive, and supportive. It ensures working environment is free of forced and child labor as well as other forms of intimidation and harassment. ESS2 also ensures that workers have channels for grievance redress, freedom of association and access to collective bargaining rights as prescribed by national law. The standard also seeks to protect vulnerable workers such as migrant labor. The requirements of Labor and Working Conditions (ESS2) extend to direct, community and contracted workers as well as primary supply workers on a Bank financed project. By adhering to these standards, projects can contribute to sustainable development and the well-being of workers and communities.

ESS 4: Community Health and Safety

This standard addresses the health, safety, and security risks and impacts on project-affected communities and the corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their circumstances, may be vulnerable. The essence of ESS 4 is to prioritize the health and safety of communities and workers impacted by projects, ensuring that their rights are protected, project risks such as the incidence of GBV/SEA/SH are minimized, and benefits are maximized. By integrating health and safety considerations into project design, implementation, and monitoring, projects can contribute to sustainable development and the well-being of all project stakeholders including project workers, especially those residing project communities. ESS4 is relevant for the project.

ESS 10: Stakeholder Engagement and Information Disclosure

This standard recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation. ESS 10 aims to promote transparent, inclusive, and participatory processes that engage stakeholders in decision-making, foster trust and accountability, and contribute to sustainable development outcomes. By

respecting stakeholder rights, facilitating access to information, and building meaningful partnerships, projects can enhance their social legitimacy, reduce conflicts, and achieve more effective and equitable results. ESS 10 is relevant for the project.

3.2 Relevant National Laws

Ghana has a comprehensive legal framework that governs labor relations and employment practices. The Labor Act 2003 (Act 651) and the Labor Regulations govern Ghana's employment and labor laws. A summary of national legislation applicable to the LMP is presented below:

Labor Act, 2003 (Act 651)

The Act establishes requirements for employers and employees in the underlisted areas:

- conditions of service and employment including wages and payments, termination of contracts maternity and other forms of leave, employment of young people, maternity benefits, and working hours and overtime;
- health, safety, hygiene, and welfare, and compensation for injury.
- trade unions and industrial relations.
- protection of employment.

Employees are required by Part XV, Sections 118(1) and (2a-h) of the Act to guarantee that each employee works in a satisfactory, safe, and healthy environment. They are also required to provide the information, instructions, training, and supervision required to ensure the health and safety of employees.

Workmen's Compensation Law, 1987 (PNDCL 187)

The 1986 law establishes guidelines for the payment of compensation to employees for personal injuries sustained while on the job. This includes regulating the employer's liability in these situations, the payment of medical expenses and provision of medical aid, certain occupational diseases, degrees of partial incapacity specified in a schedule, the determination of claims, remedies against the employer and third parties, protection of compensation against attachment or assignment, and the distribution of compensation in the event of the worker's death. When carrying out the project, GRIDCo will adhere completely to this Act. To ensure adherence to the relevant Act, GRIDCo will leverage its established internal policies and procedures specifically designed to comply with regulatory requirements.

Factories, Offices and Shops Act, 1970 (Act 328)

Act 328 upholds the obligations of the employer and advances the health, welfare, and safety of those who work in the nation. Employers must abide by the Act and make sure that all workers (including those of the contractor, the supervising consultant and the utility i.e. GRIDCo have a safe and healthy work environment to protect their own health and well-being.

Persons with Disability Act, 2006 (Act 715)

The Persons with Disability Act 715 was passed in 2006. The Act covers thematic areas such as rights, accessibility, employment, education, transportation, and health care for Persons with Disabilities (PWDs), the establishment and functions of a National Council on Persons with Disability, and some miscellaneous provisions. For example, Section 4 talks about exploitation and discrimination against a person with disability. It stipulates that Persons Living with Disability shall not discriminate against, exploited or subjected to abusive or degrading treatment (Section 4(1). Section 4(2) makes it an offense for employers to discriminate against prospective employees or employees on grounds of disability unless the disability is in respect of the relevant employment. The passage of the Act was considered a noteworthy milestone in Ghana's human rights discourse as it gave the hope that it will improve the life of PWDs to enable them to be part of mainstream society. The proposed project will be executed in full compliance with this Act.

Children's Act, 1998 (Act 560)

The Act aims to reform and consolidate the law relating to children. The act provides for the rights of the child, maintenance and adoption, regulates child labor and apprenticeship, and provides for ancillary matters concerning children generally and related matters. The act is divided into four parts as follows: Part I covers the rights of the child and parental duty, including the right to name and nationality, the right to grow up with parents, and the right to education and well-being. Part II covers quasi-judicial and judicial child adjudication, including child panels and family tribunals. Part III covers parentage, custody, access, and maintenance, including the duty to maintain a child, custody, and access. Part IV covers fosterage and adoption, including foster-care placement and adoption application. Consequently, the proposed project will be carried out in accordance with the Act. This Act is relevant to high-tension transmission line projects as it provides a legal framework to protect children's health, safety, and welfare, ensuring that their rights are not compromised by the project.

Factories, Offices and Shops Act 1970 (Act 328)

The Factories, Offices and Shops Act of 1970 (Act 328) mandates the Factories Inspectorate Department to register factories and ensure that internationally accepted standards of providing safety, health and welfare of persons are adhered to. It defines a factory to include any premises (whether in or not in a building) in which one or more people are engaged in manual labor, among others.

The Factory, Offices, and Shops Act, 1970 (Act 328) requires (factory owners including Contractors to take all reasonable steps to safeguard the health and safety of all workers working on-site and other persons authorized to be there; (ii) to keep the site in an orderly state;(iii) to protect the environment on and off the site; to avoid damage or nuisance to persons or to property of the public or others resulting from pollution, noise or other causes arising as a consequence of the Contractors methods of operation.

Criminal Code (Act 29), 1960 Act 29

The criminal Code of Ghana, the makes assault, unlawful assembly and human trafficking and kidnapping as crimes and prescribes approach punishment for offenders. In addition, Chapter 6 discusses sexual

offenses. It defines in decent assault, carnal and unnatural carnal knowledge, criminalizing unnatural carnal knowledge, rape and defilement prescribing custodial terms for these felonies.

Prevents the accumulation and exposure of filth and refuse of all kinds and the prohibition of activities, which may endanger public health or cause damage to lands, crops, cattle or goods. Any project activities that will pose danger to health and safety will be infringing on this law.

The Fire Precaution (Premises) Regulations 2003, LI 1724

The Fire Precaution (Premises) Regulations 2003 (LI 1724) requires all premises intended for use as workplaces to have Fire Certificates and installations for fire prevention and emergency response to protect workers and other users.

Table 2: Conformance of the Ghana Labour Act 2003 with key elements of the ESS2

Key Elements of ESS2	Provisions in the Ghana Labor Act 2003	Steps planned
Equal Opportunity and Non-discrimination	The law contains important provisions prohibiting discrimination based on sex and disability, including	No steps required.
Timely payment	Wages must be paid before the expiry of the 7 th working day after the last day of the wage period.	No steps required.
Working hours and overtime	40 hours per week extendable up to 50 hours with 10 hrs overtime	No steps required.
Worker rights	Regular leaves and benefits. Employers must provide reasons for termination of Employment.	The LMP incorporated necessary provisions and actions.
Prevents use of all forms of forced labour and child labour	Below 14 years of age shall not be required or allowed to work in any factory. 14 years of age shall allow working in a factory if s/he is trainee or has certificate of fitness and government permission if the nature of employment is considered nonhazardous. Otherwise, all forms of child labour are banned. This aligns with the minimum age requirements for ESS2.	No steps required.

OHS	The law provides for comprehensive OHS and empowers DIFE to conduct inspections of establishments and to imposed penalties for violations or	The World Bank's interim note on "COVID-19 Considerations in Construction/Civil Works Projects" will need to be
Women	12 weeks paid maternity leave for expectant mothers is mandatory.	No steps required.
Person with Disabilities (PWD)	Person with Disabilities (PWD) Act 2006, Act 715) provides for rights to discrimination-free employment	The LMP incorporated necessary provisions and actions.
Migrant Workers	No special provisions for migrant workers.	LMP includes steps to prevent discrimination against migrant labor
Contractor Workers	In case where the wages of a worker employed by a contractor are not paid by the contractor, the wages must be paid by the employer of the establishment.	No steps required.
Community Workers	The labour law does not recognize community workers as defined in the ESS2 and hence does not provide any special considerations for such contracting arrangements. The law requires that all labour supply contracting agency will have to be formally registered and workers	No steps required.
Supplier/Supply Workers	The law does not assign any responsibility to the project on supplier's labourers and their working conditions. Workers of suppliers will have to be the responsibility of the suppliers.	The LMP incorporated necessary provisions and actions that safeguards the rights and ensure and a safe working conditions of primary supplier workers to the extent that GRIDCO and WAPP have control the prospective supplier.
Freedom of association and collective bargaining	Employees are allowed to form union with at least 20% of the employees participating	No steps required.

Access to grievance redress mechanism	Employees can seek direct civil law redress from the Labor Courts for complaints regarding terms and conditions employment and wages. At GRIDCo and WAPP, there are formal structures for receiving, investigating resolving grievances and providing feedback for aggrieved parties for labor in Ghana's per the standards/provisions of the Bank's ESS2.	The LMP incorporates additional complementary channels for receiving and resolving grievance raised by project workers outside GRIDCo and WAPP and other sensitive grievances such as SEA/SH/GBV provisions and actions.
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Environmental Protection Agency Act, 1994 (Act 490): The Environmental Protection Agency (EPA) Act establishes the Environmental Protection Agency in Ghana, which is responsible for regulating and monitoring environmental quality, including aspects related to occupational health and safety in workplaces that may impact the environment.

Construction Regulations, 2003 (LI 1720): Construction activities in Ghana are subject to regulations that address safety and health hazards specific to the construction industry. These regulations cover issues such as scaffolding, fall protection, excavation safety, electrical safety, and the use of personal protective equipment (PPE) on construction sites.

Factories (Electricity) Regulations, 1974 (LI 720): These regulations provide requirements for the safe use of electricity in factories and other workplaces in Ghana. They cover aspects such as the installation and maintenance of electrical systems, safety precautions for electrical work, and protection against electric shock and fire hazards.

3.3 Relevant National Policies

These laws and regulations, along with other related guidelines and standards, form the legal framework for occupational health and safety in Ghana. It's essential for employers, employees, and regulatory authorities to be aware of and comply with these provisions to ensure the well-being of workers and the prevention of workplace accidents and illnesses.

In addition to laws and regulations, occupational health and safety (OHS) in Ghana is also guided by various guidelines, standards, and codes of practice established by governmental agencies, international organizations, and industry associations. These guidelines and standards provide further details and recommendations for implementing OHS measures and ensuring compliance with legal requirements. Some of the key guidelines and standards that form the legal framework for OHS in Ghana include:

Ghana National Occupational Safety and Health Policy (2010): The National Occupational Safety and Health (OSH) Policy provides a comprehensive framework for promoting workplace safety and health across all sectors of the economy. It outlines strategies for preventing work-related accidents and illnesses, improving occupational health services, enhancing regulatory enforcement, and promoting a culture of safety in workplaces.

3.4 International Labour Organization (ILO) Conventions and Recommendations

Ghana is a member of the International Labour Organization (ILO) and has ratified 65 ILO Conventions. Out of these: 46 conventions are currently in force, 17 conventions have been denounced, and 2 conventions have been abrogated or are no longer applicable under ILO procedures.

3.4.1 Relevant ILO Conventions for the Labour Management Plan

The following ILO conventions are directly relevant to labour management, occupational health and safety, and worker protection under the Ghana–Côte d'Ivoire Interconnection Reinforcement Project:

ILO Convention 87 – Freedom of Association and Protection of the Right to Organise

ILO Convention 98 – Right to Organise and Collective Bargaining

ILO Convention 29 – Forced Labour Convention

ILO Convention 105 – Abolition of Forced Labour

ILO Convention 138 – Minimum Age Convention

ILO Convention 182 – Worst Forms of Child Labour

ILO Convention 100 – Equal Remuneration Convention

ILO Convention 111 – Discrimination (Employment and Occupation)

ILO Convention 155 – Occupational Safety and Health

ILO Convention 161 – Occupational Health Services

ILO Convention 167 – Safety and Health in Construction

ILO Convention 181 – Private Employment Agencies

ILO Convention 190 – Violence and Harassment Convention (adopted 2019; Ghana ratified in 2023)

3.4.2 Other Relevant International Labour-Related Conventions Ratified by Ghana

Beyond ILO instruments, Ghana has ratified additional international conventions that strengthen labour and social protection, especially for vulnerable groups such as women and children. Relevant instruments include:

African Charter on the Rights and Welfare of the Child (ACRWC) – Protects children from economic exploitation, hazardous work, trafficking, and harmful social practices.

UN Convention on the Rights of the Child (UNCRC) – Establishes global standards on child protection, exploitation, minimum working age, and welfare.

Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) – Protects women's rights in employment, maternity, equal opportunity, and freedom from workplace harassment.

UN Convention on the Rights of Persons with Disabilities (CRPD) – Requires non-discrimination and equal access to employment for persons with disabilities.

UN Protocol to Prevent, Suppress, and Punish Trafficking in Persons (Palermo Protocol) – Addresses human trafficking, including forced labour, exploitation, and sexual exploitation.

Industry-Specific Guidelines and Codes of Practice: Various industries in Ghana may develop industry-specific guidelines, codes of practice, or best practices documents to address specific OHS issues relevant to their sector. For example, the mining industry may develop guidelines for mine safety and health, while the construction industry may have codes of practice for construction site safety.

Occupational Health and Safety Training Programs: Training programs and courses on occupational health and safety are offered by governmental agencies, educational institutions, and private organizations in Ghana. These training programs provide essential knowledge and skills to employers, workers, safety professionals, and OHS practitioners to effectively manage workplace hazards and comply with legal requirements.

Environmental Management Systems (EMS): Some organizations in Ghana may implement environmental management systems (EMS) based on international standards such as ISO 14001, which include provisions for occupational health and safety management. EMS frameworks provide a systematic approach to identifying, assessing, and controlling workplace hazards, as well as monitoring and improving OHS performance over time.

These guidelines and standards complement existing OHS laws and regulations in Ghana, providing additional guidance and recommendations for achieving and maintaining safe and healthy workplaces

across various industries and sectors. It's essential for employers, workers, and regulatory authorities to be familiar with and adhere to these guidelines to ensure effective OHS management and compliance with legal requirements.

4 ASSESSMENT OF KEY POTENTIAL LABOUR RISKS AND IMPACTS

The project is not anticipated to have significant labor risks/impacts. These are summarize under the following thematic areas.

4.1 Terms and Conditions of Work

This category covers risks related to non-compliance with the Labour Act, 2023 and ESS2, especially those affecting wages, leave, and contractual arrangements. Key risks include:

a. Employers/Contractors Paying Below Minimum Wage

Contractors or subcontractors may violate national labour laws by paying below the statutory minimum wage, failing to pay overtime, or withholding legally mandated benefits such as annual leave, maternity leave, and sick leave.

b. Violations of Terms and Conditions of Employment

Some workers may be employed without written contracts, may work excessive hours without compensation, or may not receive mandated rest periods or leave entitlements. This risk is heightened where subcontractors manage casual and unskilled labour.

4.2 Non-Discrimination and Equal Opportunities

These risks relate to potential unequal treatment of workers in access to employment and conditions of work:

i. Discrimination Against Migrant Workers

Migrant workers particularly those from border regions may face unequal access to employment opportunities, lower wages, or exclusion on the basis of origin.

ii. Discrimination Against Women

Women may face barriers to recruitment due to biased perceptions about physical tasks or safety considerations. They may also face unfavourable work schedules that conflict with caregiving roles.

iii. Sexual Exploitation and Abuse for Employment (Sex-for-Jobs)

There is a risk of SEA/SH where women or vulnerable applicants are coerced to provide sexual favours in exchange for employment opportunities or contract renewal.

iv. Labour Influx and Associated Social Risks

The arrival of non-resident workers may create unequal competition for jobs, heighten local tension, and increase risks of SEA/SH, communicable diseases, and social disruption as highlighted in the ESIA.

4.3 Protecting the Workforce

This category includes risks of exploitation, abuse, and violations of fundamental worker rights:

i. Incidence of Child Labour and Forced Labour

There remains a risk particularly in rural communities that minors may attempt to access work, or that informal labour brokers may supply workers without age verification. Forced labour risks may arise from exploitative subcontracting arrangements.

ii. Trafficking in Persons

Given the proximity of the project to the Ghana–Côte d'Ivoire border, vulnerable young women and men may be trafficked into construction areas for exploitative labour or sexual exploitation.

iii. SEA/SH and Gender-Based Violence Among the Workforce

As identified in the ESIA, transmission-line projects involving mobile work crews pose heightened risks of SEA/SH, transactional sex, and intimate-partner violence, particularly where male-dominated camps interact with nearby communities.

4.4 Occupational Health and Safety

OHS risks are inherent to transmission line construction and were extensively discussed in the ESIA. Key risks include:

i. Work-Related Accidents and Injuries

Construction workers may experience falls from heights, cuts, electrocution risks, burns, musculoskeletal injuries, snake bites, and accidents involving heavy equipment.

ii. Sector-Specific Electrical Hazards

Arc flashes, EMF exposure, tower erection hazards, cable pulling strains, and high-voltage installation risks form critical elements of the project's OHS profile.

iii. Environmental and Weather-Related Hazards

Workers may face exposure to extreme heat, heavy rainfall, difficult terrain, insect bites, and vector-borne diseases.

The power transmission sector presents unique occupational hazards that require targeted risk mitigation. These include:

- **Arc Flash Hazards:** High-energy discharges from electrical equipment can cause serious burns and fatalities.
- **Manual Handling and Musculoskeletal Risks:** Workers often engage in repetitive, strenuous physical activity, including cable pulling and tower assembly. Ergonomic practices and mechanical aids (e.g. winches, pulleys) shall be employed to reduce strain and injury.

- **Electromagnetic Field (EMF) Exposure:** Although generally below occupational exposure limits, precautionary measures will be taken in accordance with ICNIRP guidelines. Work schedules and signage will help limit prolonged exposure.
- **Environmental Conditions:** Workers may be exposed to extreme weather, insect-borne diseases, and uneven terrain. Health surveillance, PPE, and acclimatization procedures will be implemented accordingly.

All contractors must integrate these requirements into their Construction Environmental and Social Management Plans (CESMPs), and workers must receive training on sector-specific hazards. Emergency response systems will include first aid kits, arc burn kits, trained emergency responders, and communication systems at all remote sites.

GRIDCo, the implementing agency, will carry out periodic OHS audits and enforce compliance with the EHSs through monthly inspections, corrective action plans, and contractor performance evaluations. Incident reporting will distinguish between general and sector-specific events such as near-miss arc flashes, tower falls, or electrical injuries.

In addition, contractors must:

- a. Maintain a certified Safety Officer on-site at all times.
- b. Conduct daily toolbox talks with a focus on electrical hazards.
- c. Submit monthly OHS reports with incident logs, training records, and risk mitigation updates.

The integration of power sector-specific risks into the OHS management system ensures that workers are adequately protected and project activities meet both national and international safety standards.

The main labour risks associated with the program are assessed to be related to the potentially hazardous work environment, the associated risk of accidents and labour influx. Based on current conditions in the sector it is assessed that the risk of a child or forced labour is negligible, and already managed through national legislation.

Child and Forced Labour: The risk of child labour will be mitigated through Certification of labourers' age. This will be done by using the legally recognized documents such as the National Identification Card, and Birth Certificate. Further, awareness raising sessions will be conducted regularly to the communities to sensitize on prohibition and negative impacts of child and forced Labour.

Labour influx: While a substantial number of jobs will be created, it is expected that the program area will experience substantial labour influx. The Contractor existing operational procedure is to mandate and localize the economic benefits and only allow for outsiders, including expatriate labour, where there is a requirement for specialized skills. External workers, which will be few in numbers, will be accommodated at existing housing in the area which has been prior practice by Contractors in similar projects. If it is necessary there will be dedicated camps established for worker accommodation in the project. Specific

requirements to manage risks associated with labour influx, related to the interaction between program workers and local communities, such as communicable diseases and gender-based violence, are managed through contractual requirements, code of conduct and training set out in this document. These procedures are guided by national legislation and also follow the guidelines of Bank's ESS 2 and ESS 4 and the World Bank's interim note on "COVID-19 Considerations in Construction/Civil Works Projects" and the Technical Note on "Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings".

Gender-based violence: Construction workers are predominantly younger males and females, in some cases. Those who are away from home on the construction job are typically separated from their family and act outside their normal sphere of social control. This can lead to inappropriate and criminal behaviour, such as sexual harassment of women and girls, exploitative sexual relations, and illicit sexual relations with minors from the local community. A large influx of male labour may also lead to an increase in exploitative sexual relationships and human trafficking whereby women and girls are forced into sex work.

Occupational health and safety. the Contractor has existing corporate requirements for contractor training and safety, records of which are inspected monthly and audited bi-annually. The World Bank's interim note on "COVID-19 Considerations in Construction/Civil Works Projects" will have to be followed to ensure occupational health and safety of the workers.

Trafficking: Trafficking in Persons (TIP) presents a significant labour and social risk in large infrastructure projects, especially those implemented near border communities and involving mobile workforces. In accordance with the World Bank ESS2 and ESS4, Ghana's Human Trafficking Act, 2005 (Act 694), and the Labour Act, the Project adopts a zero-tolerance policy toward all forms of trafficking for labour or sexual exploitation.

TIP risks may arise through deceptive recruitment, coercion, manipulation of vulnerable persons, retention of identity documents, restriction of movement, excessive wage deductions, debt bondage, or the involvement of unregulated labour intermediaries. Young women, migrants, and economically vulnerable groups are at particular risk.

4.5 Preventive Measures

To mitigate trafficking risks, the following measures shall be implemented across all contractors, subcontractors, and primary suppliers:

- Mandatory Age and Identity Verification:

All workers must present a valid National ID, Passport, or Birth Certificate before engagement. No worker shall be employed without verifiable documentation confirming age (18+) and identity.

- Ethical Recruitment Practices:

Contractors and any labour brokers engaged must follow transparent, ethical recruitment standards. Recruitment fees, deposits, or any form of payment by the worker as a condition for employment are strictly prohibited.

- No Confiscation of Identity Documents:

Contractors and subcontractors are prohibited from withholding workers' IDs, passports, travel documents, or personal belongings. Workers must retain full control of their documents at all times.

- Monitoring of Labour Brokers and Suppliers:

The PMU shall periodically review labour supply chains to ensure that no workers are recruited through deceptive, coercive, or fraudulent means.

4.6 Awareness, Training, and Capacity Building

- All workers and supervisors shall receive mandatory training on identifying signs of labour trafficking, psychological coercion, and exploitative recruitment.
- Community informants, focal persons, and GRM officers shall be sensitized to support early detection and reporting.

4.7 Reporting and Response Mechanisms

- Survivors or witnesses of trafficking can report through confidential GRM channels, including phone hotlines, workers' representatives, and site focal persons.
- All suspected TIP cases shall be immediately referred to the Ghana Police Service, the Domestic Violence and Victim Support Unit (DOVVSU), and the Anti-Human Trafficking Unit (AHTU).
- The PMU Social Safeguards Specialist shall coordinate referrals, documentation, and case follow-up while ensuring protection of survivors' identities.

4.8 Protection of Survivors

- Survivors will be provided immediate protection, including safe accommodation, medical care, psychosocial support, and legal assistance.
- Retaliation, intimidation, or any adverse action against survivors or whistleblowers is strictly prohibited.

4.9 Enforcement and Sanctions

Contractors or subcontractors found complicit in trafficking practices including knowingly employing trafficked persons—will face immediate sanctions, including contract suspension or termination, disqualification from future works, and referral for criminal prosecution.

5 MEASURES FOR LABOR RISK AND IMPACT MANAGEMENT (POLICIES AND PROCEDURES)

5.1 Terms and Conditions of Work

The Project Implementation Unit will ensure that:

- Workers work for 8 hours a day from 8.00 am to 5.00 pm with an hour's break five (5) days a week unless otherwise agreed between the employer and the workers
- The Conditions of Service and collective bargaining agreements for construction and related workers including artisans, watchmen and waste handlers are in line with the provisions of the Labour Act 2023 and the Work Man Compensation Law. The legislations provides for Conditions of Service issues including Hours of Work (Clause 9), modalities for payment of overtime (Clause 13), Annual Leave and Leave Allowance (Clause 15) and Maternity with full pay for maximum of twelve weeks (Clause 17), Abuse Language on Site (Clause 73), Protective Clothing (Clause 37) Dirty Work Allowance for workers who come into contact with sewerage, rubbish, wood dust and toxic materials (Clause 56) and Termination of Works Contract (Clause 26) among others
- Wages negotiated every year as stipulated in the Act.
- Sub Project Contractors and Sub-Contractors will sign written employment contracts for all workers upon hiring.
- All contracts will be guide by the Labor Act, 2003
- Sub Project Contractors inform hired workers of all employment-related information and ensure that the workers understand the rights and obligations of both parties under the contract.
- A written policy manual (Code of Conduct) specifying the rules and procedures will be issued and made readily available to all workers as part of the labor contract. The Code of Conduct will be explained to workers who are not literate in English in a Language they understand. See sample CoC in annex 1.
- Employees of Sub Project Contractors, Subcontractors, Consultants and Primary Suppliers (skilled and unskilled or casual labor) are paid living wages which are not below the current minimum wage.
- Adopting a policy to cooperate with law enforcement agencies in investigating complaints about gender-based violence.
- A system to capture and investigate gender-based violence, sexual exploitation and workplace sexual harassment related complaints/issues based on confidentiality using the survivor centered approach using existing referral pathways shall be established under the project.

5.2 Non-Discrimination and Equal Opportunities

WAPP and the GRIDCo PIU shall monitor discriminatory practices not only in hiring procedures but throughout all stages of employment. To avoid any discrimination:

- Sub Project Contractors and their Subcontractors shall treat workers equally and fairly with respect to all policies, conditions and benefits of employment.
- Sub Project Contractors and their Subcontractors must ensure that employment decisions are based on relevant and objective factors (merit, experience, tasks, skills, etc.), and that consistent procedures are followed in the decision-making processes.
- GRIDCo PIU should also ensure that workers and suppliers are aware of the project's requirements and national laws on non-discrimination and equal treatment in order to promote a culture of respect and zero-tolerance for discrimination.
- The contractors should ensure that adequate mechanisms are in place for workers to report on workplace discrimination, bullying or sexual harassment. These mechanisms should be able to promptly investigate all complaints and take appropriate preventive or disciplinary action.
- All workers must be informed of their rights and encouraged to use the work-based grievance mechanism without fear of reprisal. GRIDCo PMU as well as Sub Project Contractors and their Subcontractors shall designate specific staff (e.g. a workers' representative) to act as the workers' focal point on employment discrimination issues. Workers should be able to report discriminatory incidents to a focal point on a confidential basis. At the same time, the focal point should possess adequate knowledge to advise workers on national laws and contractor/employer policies regarding non-discrimination and the various remedies available.

5.3 Workers Organization

- GRIDCo, Consultants as well as Project Contractors and their Subcontractors must not attempt to influence the right of workers to organize or associate with any Trade Union;
- The union workers must be allowed to have access to company/employer premises to carry out their responsibilities therein, as long as they exercise their duties in a reasonable and non-disruptive manner.
- GRIDCo, Consultants as well as Project Contractors and their Subcontractors shall not intimidate or harass union workers due to their active participation in collective bargaining or strikes aimed at improving working conditions; and
- GRIDCo Consultants as well as Sub Project Contractors and their Subcontractors must not refuse to recognize the elected representatives of the union members. Thus, the elected representatives

of the unionized workers but be recognized and engaged during collective bargaining and other deliberations that border on employee and staff welfare.

5.4 Forced and Child Labor

According to international law, children are entitled to the basic right to education and must not be hired to work (especially hazardous work such as civil works). Therefore,

- The minimum age for project workers under the project will be 18 years
- No child under the age of 18 shall be employed either directly or indirectly to work under the project
- GRIDCo through its PIU and other stakeholders must institute a verification system where every worker must have their age verified by a recognized community/opinion leader in addition to presenting a national identity card as a precondition for employment or birth certificate where available prior to employment.
- The Social Safeguards Specialist at the PIU shall routinely undertake spot checks for issues of child amnd forced labor.
- Prisoners and other under forced detention shall not be employed on any aspect of the project
- Where there is any reasonable doubt as to the age of the applicant, requesting and reviewing available documents to verify age (such as a birth certificate, national identification card, medical or school record).
- Persons under 18 years found on site or working on a project will be summarily removed from of the site
- Work on a site involving minors (less than 18 year) will be suspended and Sub Project Contractor will be reported to the District Assembly and the Ghana Police for investigations and necessary action
- GRIDCo and Sub Project Contractors shall be required to undertake a child labor risk assessment for each sub project and activity following the underlisted steps:
 - Identify communities and persons vulnerable to child labor risks as well as hazardous activities to children/minors through consultation with relevant Ministries, Non-Governmental Organizations and Community Based Organizations in the Sub Project catchment, review national legislations and ESS2 requirement on child and forced labor.
 - Evaluate and prioritize risks.
 - Decide on action to prevent or control the identified risks.

- Put in place the preventive and control measures through a prioritization plan.
- Monitoring, reviewing and updating the established preventive and control measures daily
- GRIDCo, Project Contractors and their Subcontractors shall create and keep separate record of all project workers.

4.5 Occupational, Health and Safety

The Contractor is committed to:

1. Complying with legislation and other applicable requirements which relate to the occupational health and safety hazards.
2. Enabling active participation in OH&S risks elimination through promotion of appropriate skills, knowledge and attitudes towards hazards.
3. Continually improving the OH&S management system and performance.
4. Availing this policy statement to all interested parties.

The Work Program will have a designated Safety, Health and Environmental Representative for the workplace or a section of the workplace for an agreed period. At a minimum, the Representative must:

- a. Identify potential hazards;
- b. In collaboration with the employer, investigate the cause of accidents at the workplace;
- c. Inspect the workplace including plant, machinery, and substance, with a view to ascertaining the safety and health of employees provided that the employer is informed about the purpose of the inspection;
- d. Accompany an inspector whilst that inspector is carrying out the inspector's duties in the workplace;
- e. Attend meetings of the safety and health committee to which that safety and health representative is a member;
- f. Subject to (g), make recommendations to the employer in respect of safety and health matters affecting employees, through a safety and health committee; and
- g. Where there is no safety and health committee, the safety and health representatives shall make recommendations directly to the employer in respect of any safety and health matters affecting the employees.

The contractor will also:

- i* Provide occupational health and safety training to all employees involved in works.
- ii* Provide protective masks, helmet, overall and safety shoes, and safety goggles, as appropriate.
- iii* Provide workers in high noise areas with earplugs or earmuffs.
- iv* Ensure availability of first aid boxes.
- v* Provide employees with access to toilets and potable drinking water.

- vi** Provide safety and occupational safety measures to workers with Personal Protection Equipment (PPE) when embarking on any mechanical work.
- vii** Properly dispose of solid waste at designated permitted sites landfill allocated by the local authorities and cleaning funds; and attach the receipt of waste from the relevant landfill authority.
- viii** Carry out all procedures to prevent leakage of generator oil into the site.
- ix** Ensure that the head of any oil tank is covered tightly.
- x** Provide secondary tank for oil and grease to avoid spills.

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

Contractors will be required to maintain accurate records in line with the specifications outlined in the LMP. The PMU reserves the right to request these records at any time to verify compliance. Routine reviews of documentation and site observations will occur at least once every month. Where discrepancies, non-compliance or violations are identified, the PMU will mandate immediate corrective actions. A summary of findings and remedial measures will be reported to the World Bank as part of the quarterly progress report.

6 RESPONSIBILITIES FOR IMPLEMENTING THE LABOR MANAGEMENT PROCEDURES

6.1 Overview of Responsible Staff and Oversight Mechanisms

The **Project Management Unit (PMU)**, led by the **Project Director (PD)**, has overall responsibility for implementing the LMP. Within the PMU, specific duties are assigned as follows:

- The **Environmental and Social Safeguards Specialist** is responsible for monitoring contractor compliance with labour, OHS, and SEA/SH requirements, reviewing monthly reports, and coordinating corrective actions.
- The **Procurement Specialist** ensures that LMP provisions, codes of conduct, and OHS clauses are integrated into bidding documents and contracts.
- The **Health, Safety and Environment (HSE) Officer** provides technical oversight on workplace safety, conducts site inspections, and verifies contractor OHS documentation.
- The **Grievance Redress/Community Liaison Officer** oversees workers' grievance mechanisms, maintains grievance records, and escalates unresolved issues.

Contractors remain responsible for preparing and implementing their contract-specific LMPs, while the PMU supervises compliance through monthly monitoring and site inspections.

6.2 Occupational Health and Safety (OHS)

For this Project, the Labour Management Plan (LMP) applies specifically to the two sub-projects being implemented:

1. **The Ghana–Côte d'Ivoire Interconnection Reinforcement Project**, and
2. **The Awudua–Dunkwa Transmission Line Project**.

Overall responsibility for implementing the LMP for both sub-projects rests with **GRIDCo Senior Management**, represented by the **Project Director (PD)**, who formally anchors and oversees all labour-related commitments under the Project. The PD designates a specific officer within the PMU to manage the day-to-day implementation of the LMP and to report regularly on compliance status.

For this Project, the designated officer responsible for daily LMP implementation is the **Environmental and Social Safeguards Specialist**, supported by the HSE Officer and the Grievance/Community Liaison Officer. These officers are responsible for routine monitoring, record verification, contractor supervision, and follow-up on corrective actions, while the PD retains strategic oversight and decision-making authority.

6.3 Labor and Working Conditions

Worker Grievance Mechanism

Existing grievance mechanisms for Project staff will remain in place. Contractors must establish and maintain a grievance redress mechanism for workers that aligns with LMP standards. A designated officer within the PMU will review contractor grievance logs monthly. Unresolved issues will be escalated through the national grievance system, while the PMU will monitor resolution progress and include outcomes in quarterly reports to the World Bank.

Training and Capacity Building

Contractors must retain a qualified officer responsible for labour and safety compliance throughout the contract period. Training of contractor personnel is the contractor's responsibility. The Safety Officer will provide daily guidance to contractor staff.

The project proponent will arrange and fund training on risks associated with labour influx and other topics deemed necessary. Contractors are required to ensure the availability of relevant personnel for both mandatory and additional trainings specified in the contract.

Community Awareness and Stakeholder Engagement

GRIDCo will proactively conduct awareness sessions for communities on compliance-related matters, such as labour standards, gender-based violence, and others. These efforts, complemented by the Project's Communication Strategy, aim to promote informed and inclusive participation of all stakeholders.

6.4 GRIDCo's Internal Occupational Health and Safety Capacity

GRIDCo, as the implementing agency, has well-established Occupational Health and Safety (OHS) protocols and institutional capacity to manage safety risks associated with high-voltage transmission projects. The company operates a dedicated Health, Safety, and Environment (HSE) Unit responsible for overseeing compliance with both national regulations and best international practices.

GRIDCo maintains an impressive safety record with continuous improvement driven by regular incident tracking, reporting, and root cause analysis. Its OHS system includes mandatory onboarding safety training for all staff, periodic refresher courses, and specialized technical training for high-risk activities such as live-line maintenance, tower erection, and substation operations.

Additionally, GRIDCo implements internal safety audits on a quarterly basis, led by the HSE Unit and reviewed by senior management. These audits cover areas such as equipment integrity, emergency preparedness, compliance with PPE protocols, and contractor performance. The company also promotes a proactive safety culture through routine toolbox meetings, safety drills, and workforce sensitization on emerging risks, including psychosocial hazards and gender-based violence. As such, GRIDCo's internal systems form a strong foundation for managing the labor and community safety risks associated with the Ghana-Côte d'Ivoire Interconnection Reinforcement Project.

The HSE Unit is a permanent GRIDCo department responsible for corporate-wide health, safety, and environmental compliance across all GRIDCo operations.

The PMU is a project-specific body established solely for the implementation of the Ghana–Côte d'Ivoire Interconnection Reinforcement and Awudua–Dunkwa Transmission Line subprojects.

The PMU oversees environmental and social compliance of contractors for this particular project; however, it relies on the technical expertise, standards, and audits of GRIDCo's HSE Unit.

The Project Management Unit (PMU), led by the Project Director (PD), is responsible for overall implementation of the Labour Management Plan (LMP). Key PMU officers support this role:

- The **Environmental and Social Safeguards Specialist** oversees compliance with labour, OHS, and SEA/SH requirements, reviews reports, and coordinates corrective actions.
- The **Procurement Specialist** ensures labour and safety requirements are incorporated into bidding documents and contracts.
- The **HSE Officer** supervises workplace safety, conducts inspections, and verifies contractor OHS compliance.
- The **Grievance/Community Liaison Officer** manages the workers' grievance system and escalates unresolved cases.

Contractors must develop and implement their own LMPs, while the PMU monitors compliance through monthly reviews and site inspections. The LMP covers both sub-projects: the Ghana–Côte d'Ivoire Interconnection Reinforcement Project and the Awudua–Dunkwa Transmission Line Project. The PD provides strategic oversight, while the Environmental and Social Safeguards Specialist leads daily implementation supported by the HSE Officer and the Grievance/Community Liaison Officer.

Contractors are required to maintain functional grievance redress systems, ensure workforce training, and provide a qualified labour and safety officer. GRIDCo will also deliver community awareness programmes on labour standards and GBV/SEA/SH.

GRIDCo's strong internal OHS capacity supported by a dedicated HSE Unit, regular safety audits, mandatory training, safety drills, and continuous incident monitoring provides a solid foundation for managing labour risks and ensuring safe implementation of the transmission line projects.

Table 3: GRIDCo HSE Unit – Staffing, Qualifications and Training Needs

Position / Designation	Core Roles / Responsibilities	Qualifications	Years of Experience	Identified Training & Capacity Needs
HSE Manager (Unit Lead)	Leads corporate HSE compliance; approves safety plans; supervises audits; escalation of serious incidents; coordination with PMU	BSc Engineering / MSc Occupational Safety & Health	12–15 years	Advanced disaster risk management; ISO 45001 Lead Auditor Certification
Safety Officer (Transmission Lines)	Oversees site safety for line construction; conducts inspections; verifies PPE; toolbox talks; JSA reviews	BSc Occupational Safety / NEBOSH Certification	7–10 years	Live-line safety refresher; advanced fall protection & rescue training
Environmental Officer	Environmental monitoring; waste and fuel management checks; compliance reporting; ESMP monitoring	BSc Environmental Science / Environmental Management	5–8 years	ESIA advanced practitioner training; GIS for environmental monitoring
Occupational Health Officer	Worker health surveillance; medical fitness verification; heat stress & vector-borne disease management	Diploma / BSc in Public Health or Occupational Health	5–7 years	Industrial hygiene; advanced first aid (Level III)
Field Safety Technician	Daily safety supervision; hazard identification; incident recording; assisting Safety Officer	HSE Technician Certificate	3–5 years	Electrical hazard awareness; certification in working at heights

The key actors in the implementation of the LMP and mitigation measures outlined in Table 3.

Table 4 Responsible Staff/Functions

Responsible Staff/Functions	Responsibilities in LMP Implementation
WAPP/GRIDCo	<ul style="list-style-type: none"> • Development and oversight over implementation of procedures and protocols relating to labor and working conditions including grievance redress for project workers • Establish, maintain and participate in the work-based GRMs for direct project workers • Ensure that adequate resources are provided to implement the LMP
GRIDCo PMU (including E&S Specialists)	<ul style="list-style-type: none"> • Engagement and management of project workers • Engagement and management of contractors/subcontractors • Strengthening the capacity of relevant stakeholders to ensure adequate implementation of the LMP based on the requirements of the Ghana Labour Act and ESS2 requirements outlined in the LMP. • monitoring role and ensure periodical labour and working conditions, environmental social audits and facilitate in conducting training for staff that will carry out LMP at project/community level. • Ensure adequate implementation of the LMP. • Ensuring that Environmental and Social Clauses with relevant clauses/articles that protect workers' rights, and ensure non-discrimination and formation of workers associations/unions at work, terms and conditions of work are in line with Ghana laws and ESS2 and prohibition of child and forced labour are inserted in Contract documents • Monitoring and reporting on labour related issues to the satisfaction of the World Bank and other relevant stakeholders • Ensuring that work-based grievance redress mechanisms are established and maintained through the Project lifespan • Ensure the requirements of the World Bank ESS2 are complied with during project implementation • Organize orientation sessions on OHS, GBV/SEA/SH for Project Workers • Accident and incident to reporting to the Bank and other stakeholders • Ensure LMP requirements are included in the bidding documents • Ensure a stand-alone document or a part of the site specific Environmental and Social Management Plan (ESMP) of the project. • Support GRIDCo HSE Unit to monitor implementation of OHS requirements at project sites and community workers use safety gears during execution of works.

	<ul style="list-style-type: none"> • Responsible for training of workers on safety measures to avoid workplace accident, filling of forms required, prepare quarterly monitoring reports • Maintain work-based GRM
Local Government Authorities (District/Municipal Assemblies) in the project communities	<ul style="list-style-type: none"> - Enforcement of provisions on Child Labour and trafficking
Supervising Consultants	Monitor the day-to-day compliance with the LMP and related plans
Contractors/ Subcontractors	<ul style="list-style-type: none"> • Responsible for updating the LMP into Plans and complying with all the provisions in the Plan for the terms and conditions of employment, non-discrimination, child/forced labor, management of the workforce and their health and safety based on this LMP, • Comply with E&S clauses that relate to labor issues • Appoint OHS Officers to ensure compliance with OHS and labor requirements on site • Train site workers and those of Subcontractors on OHS issues and work-based grievance redress mechanisms, labor issues. Codes of Conduct and good community relations • Set up participatory, accessible and time bound systems to receive, investigate, resolve and provide feedback on workers' grievance • Ensure that their workers participate in OHS, GBV/SEA/SH and other orientation sessions
Ghana Police (DOVVSU)	<ul style="list-style-type: none"> • Investigation GBV/SEA/SH cases • Gathering evidence for prosecution of the alleged perpetrator • Refer survivors for medical assessment and treatment when the DOVVSU or Police Officers are the first point of contact in GBV cases and there is no medical report • Give advice on the process of investigation and prosecution to children/survivors and their families/care givers • investigate cases of child and force labor and trafficking as well as other criminal activities involving project workers
Ministry of Jobs Employment, and Labor Relations Factory Department and Labor Commision)	<ul style="list-style-type: none"> • Mediation in labor conflicts • Enforcement of OHS legislation

7 POLICIES AND PROCEDURES

The Project adopts a comprehensive policy framework to guide labour management, worker protection, and compliance with ESS2, ESS4, and national regulations. These policies ensure that contractors, subcontractors, and primary suppliers maintain consistent standards throughout project implementation.

Key policy commitments include:

- Compliance with national labour legislation, including the Labour Act, Workmen's Compensation Law, and Occupational Safety standards.
- Mandatory adherence to the Project's Labour Management Plan (LMP), including fair recruitment, equal opportunity, and prohibition of child and forced labour.
- Enforcement of the Code of Conduct for all workers, covering appropriate behaviour, anti-discrimination, SEA/SH prevention, and respect for community values.
- Integration of OHS policies requiring PPE, safe work procedures, emergency preparedness, and continuous hazard identification.
- Policies mandating transparent and accessible grievance redress mechanisms for all categories of workers.
- Policies preventing human trafficking, exploitation, and unsafe working conditions, with clear sanctions for non-compliance.

These policies guide contractor performance and form the basis for monitoring and corrective action throughout project execution.

8 MONITORING

A structured monitoring system has been established to ensure ongoing compliance with the Labour Management Plan. Monitoring responsibilities are shared between GRIDCo's PMU, Supervising Consultants, and Contractors.

Key monitoring activities include:

- Monthly site inspections focusing on OHS compliance, worker welfare, use of PPE, and adherence to work procedures.
- Quarterly internal audits conducted by GRIDCo's HSE Unit to review contractor performance, training records, incident reports, and documentation.
- Routine verification of employment contracts, payroll records, work hours, and age-verification documents to ensure compliance with labour laws.
- Monitoring of labour influx impacts, including worker–community interactions, accommodation standards, and risk of SEA/SH.
- Regular assessment of grievances through workers' GRM logs, ensuring timely resolution and identifying systemic issues that require corrective action.
- Monitoring of primary suppliers to identify risks related to child labour, forced labour, or unsafe manufacturing environments.
- Continuous reporting to the World Bank through quarterly E&S monitoring reports detailing labour risks, incidents, and corrective actions.

Monitoring findings guide enforcement actions, capacity-building activities, and improvements in labour management across the project.

9 GRIEVANCE REDRESS MECHANISM

In any working environment it is essential for both employers and employees to be fully conversant with all aspects of disciplinary processes, the grievance handling procedures and the legal requirements and rights involved. In implementing an effective dispute management system, consideration must be given to the disputes resulting from the following:

1. Disciplinary action
2. Individual grievances
3. Collective grievances and negotiation of collective grievances
4. Gender-based violence, sexual exploitation and workplace sexual harassment

9.1 Disciplinary Procedure

The starting point for all disciplinary action is rules. These rules may be implied or explicit and of course will vary from workplace to workplace. Some rules are implied in the contract of employment (e.g. rule against stealing from the employer), however it is advisable that even implied rules be included in the disciplinary code or schedule of offences. In an organized workplace these rules ideally are negotiated with the trade union and are often included in the Recognition Agreements signed by the employer and trade union. These workplace rules must be:

- a. Valid or reasonable;
- b. Clear and unambiguous;
- c. The employee is aware, or could reasonably be aware of the rule or standard; and
- d. The procedure to be applied in the event the employee contravenes any of these rules the project proponent will establish a fair and effective disciplinary procedure in the workplace, which should be fair and just. The procedure is as follows: -
 - a. Conduct an investigation to determine whether there are grounds for a hearing to be held;
 - b. If a hearing is to be held, the employer is to notify the employee of the allegations using a form and language that the employee can understand;
 - c. The employee is to be given reasonable time to prepare for the hearing and to be represented by a fellow employee or a union representative;
 - d. The employee must be given an opportunity to respond to the allegations, question the witnesses of the employer and to lead witnesses;

- e. If an employee fails to attend the hearing the employer may proceed with the hearing in the absence of the employee;
- f. The hearing must be held and concluded within a reasonable time and is to be chaired by an impartial representative.

If an employee is dismissed, it must be given the reasons for dismissal and the right to refer the dispute concerning the fairness of the dismissal. Therefore, it is incumbent upon the Contractors to ensure that they have a disciplinary procedure and Code and standards which the employees are aware of. Each contractor will be required to produce this procedure to ensure that employees are not treated unfairly.

9.2 Individual Grievance Procedure

Every employer, including contractors, to have a *Formal Grievance Procedure* which should be known and explained to the employee.

The Code recommends that such procedure should at least:

- a. Specify to whom the employee should lodge the grievance;
- b. Refer to time frames in the Labour Management Plan to allow the grievance to be dealt with expeditiously;
- c. Allow the person to refer the grievance to a more senior level within the organization, if it is not resolved at the lowest level;
- d. If a grievance is not resolved the employee has the right to lodge a dispute with the project proponent.

All the contractors who will be engaged for the project will be required to produce their grievance procedure as a requirement for tender which at a minimum comply with these requirements. In addition, good international practice recommends that the procedures be transparent, is confidential, adheres to non-retribution practices and includes right to representation. After they are engaged, they will be required to produce proof that each employee has been inducted and signed that they have been inducted on the procedure.

9.3 Disputes Resulting from Collective Agreements

Where a trade union is recognized, it is entitled to negotiate on a regular basis with the employer over terms and conditions existing at the workplace and the employer is obliged to negotiate with it. The procedures followed in such instances is usually contained in the agreement, which state how the issues are raised, the procedure for negotiations, the composition of the parties involved in the negotiation and the procedure to deal issues that are not resolved through consensus. In the type of disputes, if the

dispute is not resolved at the workplace, the parties to the dispute can utilize the dispute resolutions mechanisms provided for in the labour legislation.

9.4 GRM for Direct Project Workers at GRIDCo

1. GRM Levels, Processes, and Timelines

Level 1: Supervisor / Site-Level Resolution (Informal or Formal Complaint)

- **Actors:**

Immediate supervisor

Site HSE Officer or Labour Officer

Contractor HR Officer

- **Process:**

Worker reports grievance verbally or in writing.

Supervisor/HSE Officer acknowledges receipt within 24 hours.

Issue is investigated and resolved within 3 working days.

- **Possible grievances:**

OHS concerns, lack of PPE

Discrimination or harassment

Salary delays

Work hours, leave and conditions issues

- **Outcome:**

If resolved, the resolution is documented and signed.

If unresolved, the worker escalates to Level 2.

Level 2: Contractor Management Level

- **Actors:**

Contractor's Project Manager

Contractor HR Manager

Contractor's Grievance Focal Person

- **Process:**

Worker submits the grievance via the contractor's formal GRM form or grievance box/phone line.

Contractor acknowledges receipt within 48 hours.

Investigation conducted, meetings held with complainant, and actions decided within 7 working days.

- **Outcome:**

Written decision is provided to the worker.

If worker is dissatisfied, the case is escalated to Level 3.

Level 3: GRIDCo PMU Grievance Committee

- **Actors:**

PMU Social Safeguards Specialist (Chair)

PMU OHS Officer

PMU HR Representative

GRIDCo Security Unit (where relevant)

HSE Unit Safety Officer

- **Process:**

Complaint submitted by worker or contractor.

PMU acknowledges receipt within 48 hours.

Committee reviews contractor's response, conducts interviews, and inspects records/sites.

Decision issued within 10 working days.

- **Outcome:**

PMU issues binding instructions to the contractor.

If GBV/SEA/SH is involved, referral occurs immediately to DOVVSU and medical/ psychosocial services.

If worker is still not satisfied, the matter proceeds to Level 4.

Level 4: GRIDCo Corporate HR / HSE Director Approval Level

- **Actors:**

GRIDCo Head of HR

GRIDCo HSE Manager

Legal Unit Representative

- **Process:**

PMU forwards unresolved cases with full documentation.

GRIDCo Corporate reviews and provides a decision within 10 working days.

- **Outcome:**

Corporate-level written final decision.

If unsatisfied, worker may trigger appeal pathways (Level 5).

Level 5: External Appeal Mechanisms (Worker's Right to Appeal / Go to Court)

Workers maintain full rights under Ghanaian law to seek external redress, including:

a. Labour Commission (National Labour Commission – NLC)

Workers may file a case if they believe labour rights were violated.

NLC mediates, arbitrates, or issues binding directives.

b. Formal Court System

Workers retain the right to take the matter to court under:

Labour Act 2003 (Act 651)

Workmen's Compensation Law

Criminal Code (in cases involving assault, harassment, or exploitation)

GRIDCo's GRM does not restrict or limit the worker's right to court action at any stage.

c. World Bank Grievance Redress Service (GRS)

Workers on the Project may submit complaints to the World Bank GRS if they believe they are adversely affected by the Project and local mechanisms have been exhausted.

2. Special GRM Provisions for GBV/SEA/SH Cases

GBV/SEA/SH cases involving project workers can be reported through DOVVSU, the police, health facilities, or dedicated GRIDCo channels. Within GRIDCo, cases are jointly investigated by the Corporate HR Department and the HSE Unit, while the PMU Social Safeguards Specialist coordinates reporting and referrals. All criminal cases are mandatorily referred to DOVVSU in line with national law.

Survivors of serious abuse are immediately referred for medical care and psychosocial support. With the survivor's consent, cases proceed through investigation, possible prosecution, and continuous monitoring by the PIU. All medical, legal, and case-management costs are covered by the Project Executing Agency.

GBV/SEA/SH grievances are handled confidentially, sensitively, and through a survivor-centred approach. GRIDCo and WAPP ensure multiple confidential reporting channels, strict confidentiality, immediate protection, impartial investigations, access to support services, and appropriate sanctions where violations occur. All cases are fully documented and reported as required.

Continuous follow-up is conducted to ensure survivor safety and well-being, and procedures are adjusted where necessary. GRIDCo also provides regular training and awareness-raising to foster a workplace culture of respect, zero tolerance for GBV/SEA/SH, and protection from retaliation.

Confidential reporting channels established (phone, focal persons, community informants).

Immediate referral to DOVVSU, accredited health facility, and psychosocial support.

Survivor-centred approach guaranteed.

Cases investigated within 72 hours for response action.

No retaliation is permitted at any level.

3. GRM Documentation Requirements

The proposal is to provide phone line that aggrieved workers can call to register their grievances directly to management level personnel of Construction Firms that will be implementing the works. This contact number must be advertised so that workers are aware of it and encourage to use it without being intimidation or reprisal.

Workers may also lodge their grievance through writing or verbally through their supervisors. If Supervisors fail to resolve the issues or he/she is the subject of the grievance, workers can escalate the issue(s) to their Union Executives, in situations where the workers/worker belong to a trade/worker's union. The Union leaders will escalate the matter to management and meet with management to resolve the grievance. Where Unions do not exist, as in the case of informal sector workers, the matter will be escalated to management, if it is beyond the Supervisor. If management is unable to resolve the matter, the aggrieved worker/workers will proceed to petition the GRIDCO PMU. If the aggrieved worker/workers

is/are not satisfied with the outcome of the process, he/she/they can opt to go to court. Similar processes and timelines for resolving community grievances are proposed for the workers' grievance system. All grievances recorded in a workers' grievance logbook. Documentation includes submission date, nature of grievance, status, actions taken, and resolution timeline. Monthly worker GRM reports submitted by contractors to the PMU. Quarterly consolidated reports submitted by PMU to the World Bank.

9.5 Grievance Redress Mechanisms for Workers on Site

The proposal is to provide phone line that aggrieved workers can call to register their grievances directly to management level personnel of Construction Firms that will be implementing the works. This contact number must be advertised so that workers are aware of it and encourage to use it without being intimidation or reprisal.

Workers may also lodge their grievance through writing or verbally through their supervisors. If Supervisors fail to resolve the issues or he/she is the subject of the grievance, workers can escalate the issue(s) to their Union Executives, in situations where the workers/worker belong to a trade/worker's union. The Union leaders will escalate the matter to management and meet with management to resolve the grievance. Where Unions do not exist, as in the case of informal sector workers, the matter will be escalated to management, if it is beyond the Supervisor. If management is unable to resolve the matter, the aggrieved worker/workers will proceed to petition the GRIDCO PMU. If the aggrieved worker/workers is/are not satisfied with the outcome of the process, he/she/they can opt to go to court. Similar processes and timelines for resolving community grievances are proposed for the workers' grievance system.

9.6 Gender-Based Violence, Sexual Exploitation and Workplace Sexual Harassment

Gender-Based Violence (GBV) survivors who are potential or actual project workers can report GBV/SEA/SH incidents to Domestic Violence and Victim Support Unit (DOVVSU) of the Ghana directly or through their helpline (055-100-0900), the nearest police station, or a health facility. Within GRIDCo, SEA/SH/GBV cases are investigated jointly by the Corporate Human Resource Department and the GRIDCo Health, Safety and Environment (HSE) Unit. The Corporate HR Officer leads the internal investigation and ensures application of HR disciplinary procedures, while the HSE Unit provides technical oversight at the worksite and ensures survivor safety and confidentiality. The PMU Social Safeguards Specialist coordinates reporting and referrals. All criminal SEA/SH/GBV cases are mandatorily referred to DOVVSU for official investigation in accordance with national law.

Upon reporting of rape and other serious sexual abuse and exploitation survivors will be referred to an accredited health facility for medical attention, if not already done. The case is then relayed to DOVVSU for investigation with the survivor's consent. If the investigation finds grounds for prosecution, the case will be forwarded to court with the survivor's agreement, and the survivor will receive psychosocial support. The PIU Social Safeguards Specialist will monitor the case's progress at every stage, ensuring

timely medical, legal, and psychological support. All costs related to case management, including medical expenses and legal proceedings, will be covered by the Project Executing Agency (PEA). Once the court reaches a judgment and the case is resolved, it will be officially closed, with updates provided to both the survivor and PIU.

Gender-Based Violence and Sexual Exploitation (GBV/SE/SH) grievances on the project will be handled in a sensitive, systematic, and comprehensive manner to ensure the safety and well-being of victims and address the issue effectively. Here are the administrative steps to handle GBV/SE/SH grievances.

For all grievances, GRIDCo and WAPP shall be:

- a. An established channel of reporting:
 - GRIDCo shall create a dedicated and confidential channel for reporting GBV/SE/SH grievances, through the Community Focal Person.
 - There should also be alternative reporting channels to accommodate different comfort levels and accessibility needs such as through the health facilities, police station, local traditional authorities, opinion leaders and community informants, etc.
 - A grievance redress mechanism form shall be designed and also used to document cases.
- b. Confidentiality and Sensitivity:
 - GRIDCo shall ensure all reports are handled confidentially to protect the privacy and dignity of the complainant.
 - GRIDCo shall train PIU Social Safeguards Specialist, and community collaborators to handle grievances with sensitivity, empathy, and without judgment.
- c. Immediate Response:
 - GRIDCo shall provide immediate support to the complainant, including medical care, psychological support, and legal assistance if necessary.
 - GRIDCo shall ensure the complainant is safe from further harm or retaliation.
- d. Thorough Investigation:
 - GRIDCo shall facilitate the thorough conduct of an impartial investigation of the grievance by involving trained GBV/SE/SH professionals in cases.
 - GRIDCo shall ensure the proper documentation of all findings and maintain confidentiality throughout the investigation process.
- e. Support Services:

GRIDCo shall facilitate psychosocial support services to the complainant as may be required,

Take Appropriate Action:

- GRIDCo shall based on the investigation findings, take appropriate legal action , or other measures as the law established.

Follow-up and Monitoring:

- GRIDCo shall regularly follow up with any complainant to ensure their well-being and address any ongoing concerns.
- GRIDCo will monitor the effectiveness of the actions taken and make necessary adjustments to policies or procedures where necessary.

Documentation and Reporting:

- GRIDCo shall maintain detailed records of all grievances, investigations, and actions taken.
- GRIDCo shall report incidents to relevant authorities or governing bodies as required by law.

f. Training and Awareness:

- GRIDCo will provide regular training to all staff on GBV/SE/SH, including how to report and handle grievances.
- GRIDCo will foster a workplace culture that promotes respect, equality, and zero tolerance for GBV/SE/SH and other forms of abuse as well as reprisal.

9.7 World Bank Grievance Redress System

Project workers who believe that they are adversely affected by a World Bank supported project may submit complaints to existing project-level grievance redress mechanisms or the World Bank's GRS¹. The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the World Bank's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of World Bank non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

¹ For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org.

10 CONTRACTOR MANAGEMENT

The Project Proponent requires that contractors monitor, keep records and report on terms and conditions related to labour management. The contractor must provide workers with evidence of all payments made, including social security benefits, pension contributions or other entitlements regardless of the worker being engaged on a fixed term contract, full-time, part-time or temporarily. The application of this requirement will be proportionate to the activities and to the size of the contract, in a manner acceptable to the proponent and the World Bank:

- a. **Labour conditions:** records of workers engaged under the Project, including contracts, registry of induction of workers including CoC, hours worked, remuneration and deductions (including overtime), collective bargaining agreements;
- b. **Safety:** recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth).
- c. **Workers:** number of workers, indication of origin (expatriate, local, nonlocal nationals), gender, age with evidence that no child labour is involved, and skill level (unskilled, skilled, supervisory, professional, management).
- d. **Training/ induction:** dates, number of trainees, and topics.
- e. **Details of any security risks:** details of risks the contractor may be exposed to while performing its work—the threats may come from third parties external to the project.
- f. **Worker grievances:** details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.

The following procedures are currently in place for the contractor management:

1. Ensure that Contractors have valid contracts with clearly define service level agreement in accordance with the national law and all environmental and social clauses, as applicable: Project Management Office, and reviewed by The Project Proponent
2. Contractor induction to The Project Proponent standards and LMP: Project Management Unit, attended by The Project Proponent team
3. Monthly submission of records: Contractor submission to Project Management Unit,
4. Monthly site visits and reports: Project Management Unit, and other Officers

5. Evaluation of contractor requirements. This includes training, OH&S files, certifications and other. The evaluation results in Portfolio Reports which includes recommendations for contract extension or termination
6. Training needs identification recorded in Contractor Training Schedule
7. Annual Contractor Management Plans submitted

11 MONITORING MECHANISM AND REPORTING ON THE LMP

The implementation of the LMP will be monitored as part of the project monitoring system to track the performance. The following relevant data shall be generated:

- **Worker Database:** A database of all workers employed indicating at minimum the name, age, sex, disability, location, next of kin/emergency contact; skill category, roles and responsibilities, disability (if any), etc.
- **Contractor Database:** A database of all contractors on the Project will be created to provide records of scope contract including location, scope of work, size of workforce, etc.
- **Supply Chain Database** This will contain information on the key suppliers and their worker profile to monitor the primary supply chain and record the results of risk assessments.

11.1 Responsible Staff

The table below provides information on the roles and responsibilities of the PIU, individuals, and contractors within the project

Table 5: Role and Responsibility of the PIU, Individual and Contractors

Entity/Role	Key Responsibilities
Project Implementation Unit (PIU)	<ul style="list-style-type: none"> • Overall coordination of Labour Management Plan (LMP) implementation. • Oversight of labour, OHS, GBV/SEA/SH, and grievance systems. • Supervision of contractors' compliance through monitoring, audits, and inspections. • Reporting to GRIDCo senior management and the World Bank. • Ensuring integration of ESS2 and ESS4 requirements in all project processes.
Project Director (PD)	<ul style="list-style-type: none"> • Provides strategic leadership on labour and OHS compliance. • Approves corrective actions and major decisions related to labour risks. • Ensures adequate resources are allocated for LMP implementation. • Receives escalated grievances and serious incident reports.
Environmental & Social Safeguards Specialist	<ul style="list-style-type: none"> • Leads day-to-day implementation of the LMP. • Monitors contractor compliance with labour, OHS, and SEA/SH requirements. • Reviews monthly reports, records, and site documentation. • Coordinates referrals for GBV/SEA/SH and serious labour violations. • Provides technical guidance to contractors and PMU staff.

HSE (Health, Safety & Environment) Officer	<ul style="list-style-type: none"> • Conducts workplace inspections and safety audits. • Reviews OHS plans, incident reports, and PPE compliance. • Leads safety briefings, toolbox talks, and hazard identification. • Supports accident investigations and verification of corrective measures. • Ensures contractor adherence to national OHS regulations and EHSGs.
Grievance Redress / Community Liaison Officer	<ul style="list-style-type: none"> • Manages workers' GRM and maintains grievance records. • Ensures grievances are resolved within the required timelines. • Escalates unresolved or sensitive cases (including SEA/SH). • Liaises with contractors, community structures, and the PMU. • Supports community awareness and GBV sensitisation activities.
Procurement Specialist	<ul style="list-style-type: none"> • Ensures all bidding documents include LMP, OHS, and GBV/SEA/SH clauses. • Verifies that contractors submit mandatory labour-related plans (OHS Plans, CoC, LMP). • Ensures labour and safety requirements are contractually enforceable.
Contractors / Subcontractors	<ul style="list-style-type: none"> • Prepare and implement contract-specific Labour Management Plans. • Recruit workers ethically and verify age and identity. • Provide written contracts, fair wages, and safe working conditions. • Establish an internal workers' grievance mechanism. • Implement OHS measures, provide PPE, and ensure safety supervision. • Conduct mandatory training (OHS, GBV/SEA/SH, CoC). • Report incidents, grievances, and monthly labour statistics to the PIU. • Take corrective actions when non-compliances are identified.
Workers (Direct, Contracted, Primary Supply)	<ul style="list-style-type: none"> • Comply with safety protocols and the Code of Conduct. • Report grievances, hazards, and unsafe conditions. • Participate in trainings and toolbox meetings. • Use PPE and follow approved work procedures. • Respect community norms and avoid prohibited behaviours, including SEA/SH.

12 MONITORING AND REPORTING ON LMP

12.1 Labor Management Procedure Monitoring

A list of monitoring indicators, frequency of monitoring and responsible party/parties for monitoring are presented in Table 3 to guide the monitoring of the LMP. The indicators are not exhaustive and can be updated during the preparation of sub project safeguards instruments and during project implementation.

Table 6: Monitoring Indicators for the LMP

Item	Monitoring Indicators	Frequency of Monitoring	Means of Verification	Responsibility for Monitoring	Supporting Agencies
Occupational Health and Safety Issues	<ul style="list-style-type: none"> Number, type, place and time of accidents/incidents and/or near misses Number of OHS and hygiene training programmes provided for sub project contractors' and sub-contractors employees. Number and type of PPEs distributed by Sub Project Contractors and Sub-Contractors Number of workers on site wearing the appropriate PPEs Presence of Health and Safety Officer on Site Site workers level of compliance with OHS standards, e.g., wearing of PPEs Presence of First Aid Kits on site Presence of Fire Extinguishers on Site and offices Hoarding material 	<ul style="list-style-type: none"> Monthly 	<ul style="list-style-type: none"> Site Visits Project Contractors Accident Records books Accident/ Incident Reports 	GRIDCo	<ul style="list-style-type: none"> WAPP Ministry of Employment, Jobs and Labor Relations Factories Inspectorate Division of WAPP Sub Project Consultant District Factories Inspectorate Division Municipal/District Assemblies in the Project Corridor Supervising Consultant
Labor Related Issues	<ul style="list-style-type: none"> Number of Sub Project Contractor and Sub-Contractor employees with formal Contracts Number of child labor cases recorded Number and type of employees recruited from the community by gender Average monthly income of project workers and informal workers by gender Working days and hours Contractor and Sub-Contractor employees who have signed the Code of Conduct 	<ul style="list-style-type: none"> Monthly 	<ul style="list-style-type: none"> Site Visits Inspection of Employees Contracts Random interview of project workers 	<ul style="list-style-type: none"> GRIDCO PMU 	<ul style="list-style-type: none"> Sub Project Consultant District Factory Inspectors Supervising Consultant GRIDCO HR Dept.
Gender Based Violence, Sexual	<ul style="list-style-type: none"> Number of uptake points of complaints Number of SEA/SH/GBV cases reported by type Number of SEA/SH/GBV cases under investigation by type Number of cases under 	<ul style="list-style-type: none"> Monthly 	<ul style="list-style-type: none"> Grievance Redress Mechanism Platform On Site Grievance Redress 	GRIDCo PMU	<ul style="list-style-type: none"> WAPP Sub Project Consultant GBV Service Providers Local Health Facilities

Exploitation and Abuse, and Sexual Harassment	<ul style="list-style-type: none"> prosecution by type Number of cases resolved/discharged by outcome Sex and age of perpetrators and survivors Duration between case reportage, feedback and case completion 		Registers		<ul style="list-style-type: none"> Ghana Police Service (DOWSU) GRIDCo HR Dept
Community Health and Safety Issues	<ul style="list-style-type: none"> Incidence of communicable and non-communicable diseases in the project beneficiary communities *Accidents involving contractors' trucks and equipment as well as third party haulage trucks by type and degree of severity 	<ul style="list-style-type: none"> Daily 	<ul style="list-style-type: none"> Top ten causes of morbidity from hospital records of the nearest Health Facility in project corridor Reported accidents at local police stations 	GRIDCo PMU	<ul style="list-style-type: none"> Project Consultant Local Health Facilities in the Project Corridors

12.2 Reporting on the Labor Management Procedures

Sub Project Contractors and Consultants will submit Monthly Progress Reports on Environment and Social (E&S) Safeguards to the PIU with a section dedicated to progress on the implementation of measures outlined in this Labor Management Procedures and any subsequent plan prepared based on this procedure. The section will report on non-compliance issues and timelines for compliance, incidence/accidents, status of grievances received among others. The report will also discuss mitigation measures of identified emerging labor impacts/risks.

The PMU Safeguard team will compile a summary of the E&S issues on the Project in a quarter and submit to the Bank in the Environmental and Social Quarterly Monitoring Report including highlights on issues relating to ESS2 and progress and performance of implementing this LMP.

Annual third-party monitoring reports and a project completion report capturing implementation of the LMP will also be prepared by third party specialists.

13 PRIMARY SUPPLY WORKERS

The risk associated with primary supply associated with the Project is assessed below. All primary suppliers are formal businesses who are required to procure and produce materials subject to high standards. Any new supplier is vetted using a different form which screens the supplier in regard to compliance with taxes, certification, licensing, and workmen's compensation.

A separate form requires that the primary supplier identify the company's permanent staff, and declare any current or prior arbitrations as well as any criminal convictions. Registered suppliers are subject to regular review. The review is carried out twice annually and requires an Officer to visit the supplier's premises. The supplier evaluation form provides for the Commercial Services to report any labour irregularity if observed.

The Project Proponent will also ensure, that any primary supplier to the project report fatalities or serious injury, and informs government authorities in accordance with national reporting requirements.

14 RESPONSIBLE STAFF

The overview of responsible staff and oversight mechanisms will be described in further detail in the ESMF. This is an overview – the details will flow from the ESMF and can be taken further forward during the implementation stage.

The Project Management Unit *inter alia* the Project Director (PD) has the overall responsibility to oversee all aspects of the implementation of the LMP, in particular to ensure contractor compliance. The project proponent will address all LMP aspects as part of procurement for works as well as during contractor induction. The contractor is subsequently responsible for management in accordance with contract specific Labour Management Plans, implementation of which will be supervised by the Project Management Unit on a monthly basis or at shorter intervals as defined by specific Plans. The detailed approach is described in the following sections.

Occupational Health and Safety. Contractors must engage a minimum of one safety representative. Smaller contracts may permit for the safety representative to carry out other assignments as well. The safety representative ensures the day-to-day compliance with specified safety measures and records of any incidents. Minor incidents are reported to the project proponent on a monthly basis, serious incidents are reported immediately. Minor incidents are reflected in the quarterly reports to the World Bank, major issues are flagged to the World Bank immediately.

Labour and Working Conditions. Contractors will keep records in accordance with specifications set out in this LMP. The project proponent may at any time require records to ensure that labour conditions are met. The Project Management Unit will review records against actuals at a minimum on a monthly basis and can require immediate remedial actions if warranted. A summary of issues and remedial actions will be included in quarterly reports to the World Bank.

Worker Grievances. The procedures currently in place will remain for Project staff. Contractors will be required to present a worker grievance redress mechanism which responds to the requirements in this LMP. The Project Management Unit's designated Officer will review records on a monthly basis. Where worker concerns are not resolved, the national system will be used as set out in the section, but the Project Management Unit will keep abreast of resolutions and reflect in quarterly reports to the World Bank.

Additional Training. Contractors are required to, at all times, have a qualified designated officer on board. If training is required, this will be the contractor's responsibility. The safety officer will provide instructions to contractor staff. The project proponent will procure for training to address risks associated with labour influx and will provide a schedule for trainings required. The contractor will be obligated to make staff available for this training, as well as any additional mandatory trainings required by the project proponent, as specified by the contract.

Raising Awareness. The project will take initiative to organize sessions on raising awareness of the communities on issues relevant to the project's compliance and standards (e.g. labour standards, gender-based violence et al). This, in addition to project's Communication Strategy, will ensure effective and efficient participation of different stakeholders of the project.

ANNEX 1: WRITTEN PARTICULARS OF EMPLOYMENT

- Name of Employer
- Name of Employee
- Date Employment began
- Wage and Method of Calculation
- Interval at which wages are paid
- Normal Hours of work
- Short description of employee's work
- Probation Period
- Annual Holiday Entitlement
- Paid Public Holiday
- Payment during sickness
- Maternity Leave (if employee female)
- Nursing Break Entitlement (for female employee)
- Notice employee entitled to receive
- Notice employer required to give
- Pension Schedule, Provident Fund Gratuity Schedule etc.
- Any other matter either party wishes to include

Notes:

- (a) An employee is free to join a trade union or staff association, which is recognized by the undertaking.
The address of the Trade Union or Staff Association is:
- (b) The grievance procedure and disciplinary procedure in this undertaking requires to be followed when a grievance arises or disciplinary action that needs to be taken.....
- (c) When any heading is inapplicable enter NIL.

Employer's signature

.....

Date

.....

Witness signature

.....

Date

.....

ANNEX 2: DUE DILIGENCE FOR SOCIAL AND ENVIRONMENTAL MITIGATION MEASURES IN CONTRACTS

Stage of Contractual Process	Due Diligence
<ul style="list-style-type: none"> • Before bidding 	<ul style="list-style-type: none"> • Ensure that the terms of reference clearly define the supervision engineer's responsibilities regarding oversight of, and reporting on, labour influx and workers' camps. For high risk projects, have independent safeguards supervision. • Ensure the team skills in the terms of reference clearly include key staff qualified and experienced in managing similar projects, and demonstrated capacity to manage social and environmental issues, including issues pertaining to community health and safety. • Ensure that the project GRM is established and its use is widely publicized.

<ul style="list-style-type: none"> • Preparation of bidding documents 	<ul style="list-style-type: none"> • Review contract conditions included in bidding documents to: <ul style="list-style-type: none"> (i) Ensure that the relevant mitigation measures in the ESMP are reflected and budgeted in the contract, (ii) Ensure the ESMP forms part of, and is explicitly referred to in the bidding documents. (iii) Identify relevant provisions (workers, camps, child and forced labour, safety, grievance redress, etc.) regulating the contractor's responsibility and identify any gaps, inconsistencies or areas of concern that could be addressed through additional provisions in the "particular conditions of contract" and/or technical specifications (iv) Include a requirement that all workers sign 'Codes of Conduct' governing behavior, and identifying sanctions (v) Clearly identify that training programs on implementing the Codes of Conduct, etc. will be undertaken by external providers • Ensure the contract conditions clearly specify what type of penalty the contractor will face if the provisions of the ESMP and CESMP are not adhered to—including by sub- contractors. This may include direct incentives to contractors in the form of penalties for poor performance on social and environmental matters or specific Performance Securities for ESMP and CESMP compliance. • Ensure bidding documents make clear the responsibilities of the contractor to prepare and adhere to a CESMP based on the ESMP and that no civil works will commence until the CESMP has been approved by the supervision engineer.
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	<ul style="list-style-type: none"> • Ensure the bidding documents detail how the contractor and supervision engineer will be required to monitor and report on the impacts on the local community, issues related to labour influx and workers' camps. • Propose Key Performance Indicators (KPIs) for Contract Management, reflecting issues and risks specific to the contract and the monitoring plan.
<ul style="list-style-type: none"> • Bidding evaluation 	<ul style="list-style-type: none"> • Review the Borrower's bid evaluation report and request to review the bids where appropriate, to verify for the recommended bidder that documents related to the ESMP, safeguard implementation capacity, and other obligations of the contractor required to be submitted with the bid are sufficiently detailed and cover the contractual requirements. • Require the contractor's representative or dedicated community liaison staff to have the ability to communicate in the language of the Borrower and/or the local language. • Verify that the contract management framework identifies clearly lines of communication and that these are formalized and a consistent record is provided.

<ul style="list-style-type: none"> • After contract signing 	<ul style="list-style-type: none"> • Prior to commencing works, the contractor submits site-specific CESMP(s) based on the ESMP, which includes specific management plans for: (i) work activities; (ii) traffic management; (iii) occupational health and safety; (iv) environmental management; (v) social management; and • (vi) labour influx. • Supervision engineer reviews and approves the CESMP— with inputs from appropriate Government agencies—before any works start. For high risk projects, the Bank should also review and clear the CESMP. Borrower should disclose the approved CESMP.
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ANNEX 3: CODE OF CONDUCT

The Code of Conduct defines labour standards that aim to achieve decent and humane working conditions. The Code's standards are based on national law and accepted good labour practices.

Companies affiliated with the Project Proponent are expected to comply with all relevant and applicable laws and regulations of the country in which workers are employed and to implement the Workplace Code in their applicable facilities. When differences or conflicts in standards arise, affiliated companies are expected to apply the highest standard.

The Project Proponent monitors compliance with the Workplace Code by carefully examining adherence to the Compliance Benchmarks and the Principles of Monitoring. The Compliance Benchmarks identify specific requirements for meeting each Code standard, while the Principles of Monitoring guide the assessment of compliance. The Project Proponent expects affiliated companies to make improvements when Code standards are not met and to develop sustainable mechanisms to ensure ongoing compliance.

The Project Proponent provides a model of collaboration, accountability, and transparency and serves as a catalyst for positive change in workplace conditions. As an organization that promotes continuous improvement, The Project Proponent strives to be a global leader in establishing best practices for respectful and ethical treatment of workers, and in promoting sustainable conditions through which workers earn fair wages in safe and healthy workplaces.

Employment Relationship

Employers shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labour and social security laws and regulations.

Non-discrimination

No person shall be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group or ethnic origin.

Harassment or Abuse

Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse.

Forced Labour

There shall be no use of forced labour, including bonded labour or other forms of forced labour.

Child Labour

No person shall be employed under the age of 18 or under the age for completion of compulsory education, whichever is higher.

Freedom of Association and Collective Bargaining

Employers shall recognize and respect the right of employees to freedom of association and collective bargaining.

Health, Safety and Environment

Employers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employers' facilities. Employers shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment.

Hours of Work

Employers shall not require workers to work more than the regular and overtime hours allowed by the law of the country. The regular work week shall not exceed 40 hours. Employers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Employers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

Compensation

Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income. Employers shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. Where compensation does not meet workers' basic needs and provide some discretionary income, each employer shall take appropriate actions that seek to progressively realize a level of compensation that does.

Expanded Code of Conduct (CoC)

A. Core Principles and Shared Expectations

1. Treat all individuals with respect, regardless of gender, ethnicity, religion, or status.
2. Adhere to occupational health and safety protocols and use all personal protective equipment (PPE) as required.
3. Avoid any form of child labor, forced labor, harassment, exploitation, or abuse.
4. Protect the confidentiality and integrity of project data and avoid misuse of equipment or resources.
5. Refrain from the use of alcohol, narcotics, or other impairing substances during work hours.
6. Immediately report safety hazards, misconduct, or violations of this CoC.
7. Participate in mandatory training sessions related to health, safety, and gender-based violence (GBV).

B. Category-Specific Expectations

1. Direct Workers

Expected Conduct:

- a. Uphold the values of integrity and public accountability.
- b. Serve as role models for other worker categories.
- c. Observe protocols for public communication and engagement with local communities.

Enforcement:

- a. Managed under GRIDCo's internal HR and disciplinary policies.
- b. Breaches may lead to suspension, reassignment, or dismissal following due process.

2. Contracted Workers

Expected Conduct:

- a. Abide by site rules and safety procedures, including access control and permit systems.
- b. Respect community norms and avoid any behavior that could be construed as aggressive, discriminatory, or predatory.
- c. Sign a copy of this Code upon induction.

Enforcement:

- a. Violations shall be addressed first by the contractor's internal system.

- b. The Project Proponent may impose sanctions including removal from the project, blacklisting, or termination of contract.

3. Primary Supply Workers

Expected Conduct:

- a. Follow delivery protocols and security checks at the work sites.
- c. Avoid offering or soliciting bribes, kickbacks, or illicit favors.
- d. Adhere to child and forced labor prohibitions in the supplier's workforce.

Enforcement:

- a. Breaches will be documented by site supervisors or the E&S team.
- b. Suppliers may face contract suspension, financial penalties, or termination if corrective actions are not taken.

C. Mechanisms for Enforcement and Redress

1. Reporting Violations:

- Violations may be reported anonymously through the project's Grievance Redress Mechanism (GRM) or directly to the site E&S Officer.

2. Investigation and Adjudication:

- a. All complaints will be reviewed confidentially.
- b. Where applicable, interviews, documentation, and third-party verification may be used.

3. Disciplinary Measures:

- Include verbal or written warnings, temporary suspension, referral to law enforcement (in case of criminal offenses), or termination.

4. Training and Awareness:

- a. All workers will undergo orientation on this CoC.
- b. Annual refresher sessions and toolbox talks will reinforce expectations.

D. Worker Acknowledgment

Each worker must sign the acknowledgment form below:

I, [Worker's Name], have read or had read to me this Code of Conduct. I understand its contents, have had the opportunity to ask questions, and agree to abide by its terms. I understand that violations may result in disciplinary action.

Signature: _____ Date: _____

Supervisor Name: _____ Witness: _____