

Government of Montenegro



**Ministry of Ecology, Sustainable Development and Northern Region
Development**

Ministry of Agriculture, Forestry and Water Management



LABOUR MANAGEMENT PLAN (LMP)

Prepared for

**Montenegro Water Security and Climate Adaptation Phase 1 Project
(P512709)**

June 2026

Contents

1. Introduction	4
1.1 Background and description of the WASEC project	4
1.2 Purpose of this LMP	5
1.3 Scope of this LMP	5
2. Legislative Framework and Reference Standards	6
2.1 National Requirements	6
2.2 International Standards and Conventions	7
3. Linkage with Other Project Plans and Procedures	9
4. Roles and Responsibilities	10
5. Labour Management	12
5.1 Project Workers	12
5.2 Minimum Age and Child Labour	13
5.3 Equal Opportunity and Non-Discrimination	13
5.4 Forced Labour	13
5.5 Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) Risks	13
All contractors must:	13
5.6 Supply Chain	14
5.7 Health and Safety	14
5.8 Workers' Welfare	15
5.9 Freedom of Association	15
5.10 Local Recruitment	15
5.11 Working Conditions and Labour Influx	16
5.12 Disciplinary Measures	16
5.13 Working Hours and Overtime	16
5.14 Holidays and Weekly Leave	16
5.15 Sick Leave	16
5.16 Social Security	16
5.17 Workers' Grievance Mechanism (WGM)	17
PIU-Administered WGM	18
6.1 Mitigation Measures Comprising both Construction and Operational Phases	19
7. Training	22
8. Monitoring and Reporting	23
8.1. Key Performance Indicators	23
8.2. Reporting	24
9. Audit and Review	25
ANNEX	26

List of Tables

Table 1 — Roles and Responsibilities for Labour Management	11
Table 2 Labour Management Monitoring.....	23
Table 3 Key Performance Indicators	24

List of Acronyms and Abbreviations

Abbreviation	Full Term
AETR	European Agreement concerning the Work of Crews of Vehicles Engaged in International Road Transport
AMP	Asbestos Management Plan
C-ESMP	Contractor Environmental and Social Management Plan
CoC	Code of Conduct
E&S	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS2	Environmental and Social Standard 2 (Labour and Working Conditions)
ESS4	Environmental and Social Standard 4 (Community Health and Safety)
EU	European Union
GRM	Grievance Redress Mechanism
IBRD	International Bank for Reconstruction and Development
IFC	International Finance Corporation
ILO	International Labour Organization
KPI	Key Performance Indicator
LMP	Labour Management Plan
M&E	Monitoring and Evaluation
MERS	Ministry of Ecology, Sustainable Development and Northern Region Development
WASEC	Montenegro Water Security and Climate Adaptation Project
MAFWM	Ministry of Agriculture, Forestry and Water Management
MSDS	Material Safety Data Sheet
OHS	Occupational Health and Safety
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
PROCON	"Project – Consulting" - Podgorica – PIU in this Project
RPF	Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
TSU	Technical Services Unit
WGM	Workers' Grievance Mechanism

1. Introduction

1.1 Background and description of the WASEC project

The Montenegro Water Security and Climate Adaptation Project (WASEC) is Phase 1 of a ten-year Multi-Phase Programmatic Approach (MPA) designed to transform Montenegro's water sector and support the country's EU accession agenda. The project is financed by the International Bank for Reconstruction and Development (IBRD)¹ and the OPEC Fund for International Development, with a total project cost of approximately US\$ 58 million (IBRD: US\$ 35 million; OPEC Fund: US\$ 23 million).

The Project Development Objective (PDO) is to improve water security and climate-resilient water services in Montenegro.

The project is organized into four components:

- Component 1 — Strategic Investments in Water Services Infrastructure and Resilience (approx. EUR 40 million): Finances the rehabilitation, modernization, and expansion of water supply and sewer networks through 21 priority subprojects across municipalities in the coastal, central, and northern regions of Montenegro.
- Component 2 — Integrated Approaches for Coastal Water Security (approx. EUR 5 million): Covers expansion of the Malo Blato lake water treatment facility (Lake Skadar) and hydromorphological and hydrogeological studies of the Morača River.
- Component 3 — Strengthening the Enabling Environment for Water Sector Governance (approx. EUR 2.5 million): Supports institutional and policy reforms, including the National Strategy for Water Services Development, tariff methodology revision, and a digital benchmarking platform.
- Component 4 — Project Management (approx. EUR 2.5 million): Finances PIU (PROCON) operational costs and project coordination and TSU.

The WASEC project will finance infrastructure investments under Components 1 and 2, including the rehabilitation and expansion of water supply pipelines, sewer networks, pumping stations, and water treatment facilities across 21 municipalities. While the project design prioritizes the use of existing road rights-of-way and public land, it is acknowledged that some subprojects — particularly those involving new pipeline alignments, reservoir expansions, or facility upgrades — may result in the temporary or permanent acquisition of privately held land, temporary access restrictions, or economic displacement of land users.

At the time of preparation, specific site alignments and technical designs for all 21 Component 1 subprojects are not yet finalized. Accordingly, it is not possible to prepare site-specific Resettlement Action Plans (RAPs) at this stage. This Resettlement Policy Framework (RPF) has therefore been prepared to establish the principles, procedures, organizational arrangements, and financing mechanisms that will govern the preparation and implementation of site-specific RAPs once subproject details are known.

This RPF applies to all project activities under Components 1 and 2 that may result in land acquisition, temporary or permanent access restrictions, or economic displacement, whether or not physical relocation of people is involved.

¹ The International Bank for Reconstruction and Development (IBRD) is the legal entity within the World Bank Group that finances this project. "World Bank" and "IBRD" are used interchangeably throughout this document and refer to the same institution.

1.2 Purpose of this LMP

This Labour Management Plan (LMP) has been prepared for the Montenegro Water Security and Climate Adaptation Project (WASEC, P512709), Phase 1, financed by the International Bank for Reconstruction and Development (IBRD) and co-financed by the OPEC Fund for International Development. The LMP has been prepared in accordance with the World Bank Environmental and Social Standard 2 (ESS2) on Labour and Working Conditions.

The purpose of this LMP is to:

- Identify the types and estimated numbers of workers who will be engaged under the project;
- Describe the applicable national legislative framework and World Bank standards;
- Establish requirements and procedures to ensure workers' rights are respected and that working conditions are safe, fair, and non-discriminatory;
- Establish a Workers' Grievance Mechanism (WGM) accessible to all project workers;
- Set out roles and responsibilities for labour management across all implementing entities.

1.3 Scope of this LMP

The LMP applies to all project workers engaged under WASEC Phase 1, including workers employed or engaged by the PIU (PROCON), the Technical Services Unit (TSU), contractors, subcontractors, and consultants delivering project activities. It covers the full project implementation period from effectiveness (expected October 2026) through project closing (December 31, 2030).

The LMP defines:

- Applicable national labour legislation and international standards,
- Roles and responsibilities for labour and workforce management,
- Measures to prevent child labour and forced labour,
- Principles of equal opportunity and non-discrimination,
- Mechanisms for addressing workers' grievances,
- Provisions for occupational health and safety (OHS),
- Guidelines for monitoring and reporting on labour practices.

The LMP is a living document. It will be reviewed and updated within six months of project effectiveness and thereafter whenever there are significant changes to project scope, workforce composition, or identified risks.

2. Legislative Framework and Reference Standards

2.1 National Requirements

Project implementation must comply with all applicable Montenegrin legislation governing employment and labour relations. The key national instruments include:

Laws:

- Labor Law (Official Gazette of Montenegro, No. 74/19 with amendments 008/21, 059/21, 068/21, 145/21, 077/24, 084/24, 086/24 and 122/25),
- Law on Employment Mediation and Rights during Unemployment (Official Gazette of Montenegro, No. 024/19 and 029/25),
- Law on Mandatory Health Insurance (Official Gazette of Montenegro, No. 145/21, 048/24),
- Law on Pension and Disability Insurance (Official Gazette of Montenegro, No. 054/03, 039/04, 061/04, 079/04, 081/04, 029/05, 014/07, 047/07, 012/07, 013/07, 079/08, 014/10, 078/10, 034/11, 039/11, 040/11, 066/12, 036/13, 038/13, 061/13, 006/14, 060/14, 060/14, 010/15, 044/15, 042/16, 055/16, 080/20, 145/21, 145/21, 086/22, 099/23, 125/23, 077/24, 011/25, 122/25),
- Law on Prohibition of Discrimination (Official Gazette of Montenegro, No. 46/10, 40/11, 18/14, 42/17),
- Law on Labor Inspection (Official Gazette of Montenegro, No. 79/08, 40/11),
- Law on Strike (Official Gazette of Montenegro, No. 11/15, 84/24),
- Law on Social Council (Official Gazette of Montenegro, No. 44/18)
- Law on Health and Safety at Work (Official Gazette of Montenegro, No. 034/14, 044/18, and 84/24),
- Law on Foreigners (Official Gazette of Montenegro, No. 12/18, 3/19, 86/22, 77/24),
- Law on Administrative procedures (Official Gazette of Montenegro, No. 56/14, 20/15, 40/16, 37/17),
- Law on the Prohibition of Harassment at Work (Official Gazette of Montenegro, No. 30/12, 54/16, 84/24)
- Law on Amicable Settlement of Labour Disputes (Official Gazette of Montenegro, No. 145/21)
- Law on Personal data protection (Official Gazette of Montenegro, No. 79/08, 70/09, 44/12, 22/17, 77/24).

Rulebooks:

- Rulebook on the Use of Personal Protective Equipment and Equipment at Work (Official Gazette of Montenegro, No. 135/21),
- Rulebook on the Manner and Procedure for Performing Previous and Periodical Specialist Medical Examinations of Workers (Official Gazette of Montenegro, No. 43/17,
- Rulebook on Health and Safety Measures at Works against Exposure to Noise (Official Gazette of Montenegro, No. 37/16),
- Rulebook on Protection Measures at the Workplace (Official Gazette of Montenegro, No. 104/20),
- Rulebook on Protection Measures during Using of Working Equipment (Official Gazette of Montenegro, No. 34/14),
- Rulebook on Equipment and Procedure for First Aid and Organization of Rescue Service in the Event of an Accident at Work (Official Gazette of FRY, No. 15/65 and 28/66),

- Rulebook on Technical Requirements for Personal Protective Equipment (Official Gazette of Montenegro, No. 143/21),
- Rulebook on the Manner and Procedure of Training Employees for Safe Work (Official Gazette of Montenegro, No. 57/06),
- Rulebook on the Content and Method of Issuing the Report on Injuries at Work (Official Gazette of Montenegro, No. 18/93),
- Rulebook on the Manner and Procedure of Risk Assessment at the Workplace (Official Gazette of Montenegro, No. 43/07, 14/14),
- Rulebook on Keeping Records in the Field of Safety at Work (Official Gazette of Montenegro, No. 79/04),
- Rulebook on Signs for the Health and Safety at Work (Official Gazette of Montenegro, No. 24/15),
- Rulebook on Occupational Safety and Health Measures Against Risks Arising from Exposure to Carcinogenic, Mutagenic or Reprotoxic Substances (Official Gazette of Montenegro, No. 127/25),
- Rulebook on Occupational Safety and Health Measures Against Risks Arising from Exposure to Chemical Substances (Official Gazette of Montenegro, No. 81/16, 30/17, 40/18, 77/21, 93/25),
- Rulebook on Health and Safety Measures against Exposure to Noise (Official Gazette of Montenegro, No. 37/16),
- Rulebook on the Manner and Procedure of Training Employees for Safe Work (Official Gazette of Montenegro, No. 79/04).

These legal instruments define the mandatory requirements for fair employment practices, occupational health and safety, workplace conditions, and labour rights protections that must be implemented and monitored throughout the preparation/construction and operation phases of the Project.

2.2 International Standards and Conventions

In addition to national legislation, the Project shall be implemented in accordance with internationally recognized labour guidelines and performance standards. These standards are essential for meeting the expectations of international financial institutions and for ensuring best practices in labour management, occupational health and safety, and protection of workers' rights throughout the Project lifecycle.

- Relevant EU labour and occupational health and safety directives
- World Bank Environmental and Social Standards; ESS2 and ESS1
- IFC Performance Standard 2 (2012) - Labour and Working Conditions
- International Labour Organization (ILO) Core Conventions
 - C29 – Forced Labour Convention
 - C105 – Abolition of Forced Labour Convention
 - C182 – Worst Forms of Child Labour Convention
 - C111 – Discrimination (Employment and Occupation) Convention
 - C87 – Freedom of Association and Protection of the Right to Organize Convention
 - C100 – Equal Remuneration Convention

- C138 – Minimum Age Convention
- C155 – Occupational Safety and Health Convention
- C187 – Promotional Framework for Occupational Safety and Health Convention
- C161 – Occupational Health Services Convention
- C162 – Asbestos Convention
- C171 – Night Work Convention
- C98 – Right to Organise and Collective Bargaining Convention
- C190 – Violence and Harassment Convention (The Convention will enter into force for Montenegro on 27 Feb 2026)

These international standards and conventions shall guide the planning and implementation of labour management practices and support continual improvement in managing labour-related risks and promoting safe and equitable working conditions throughout the construction and operation phases of the Project.

3. Linkage with Other Project Plans and Procedures

The LMP establishes a common framework for labor management, working conditions, workers' rights, and occupational health and safety applicable across all WASEC activities:

- Environmental and Social Management Framework (ESMF): Sets out the overarching E&S risk management approach and mitigation hierarchy for all subprojects. Site-specific Environmental and Social Management Plans (ESMPs) and Contractor ESMPs (C-ESMPs) will be prepared for individual subprojects.
- Stakeholder Engagement Plan (SEP): Governs how workers and communities are informed and consulted throughout the project. The SEP's Grievance Redress Mechanism (GRM) is accessible to the public; the LMP establishes a dedicated Workers' Grievance Mechanism (WGM) for project workers, linked to but distinct from the public GRM.
- Resettlement Policy Framework (RPF): Governs land acquisition and involuntary resettlement where applicable.
- Environmental and Social Commitment Plan (ESCP): Records the commitments made by the Borrower regarding E&S risk management, including those related to labour.
- Codes of Conduct (CoC): All contractors and their workers are required to sign individual Codes of Conduct, including provisions on prohibited behaviours (SEA, SH, discrimination, violence) as a condition of employment.

Contractors are required to reflect the requirements of this LMP in their own site-level Labour Management Procedures.

4. Roles and Responsibilities

The organizational structure for the Project defines the roles and responsibilities of the institutions and entities involved in the implementation and oversight of the WASEC, including its subprojects. The Project is financed by the WB and is implemented under the leadership of the MESR.

MESR and MAFWM will serve as the line ministries responsible for overall sector oversight and policy coordination.

MESR is responsible for the overall management and implementation of the Project. It provides strategic direction, ensures compliance with national legislation and World Bank requirements, and coordinates with relevant institutions throughout Project implementation. In this context, MESR works closely with the Ministry of Agriculture, Forestry and Water management (MAFWM) and relevant municipal authorities.

The project will be implemented by a newly established Project Implementation Unit (PIU) PROCON, which serves as the National Project Implementation Unit in the Field of Communal Activities and Environment, as established by the Government of Montenegro. The PIU will be staffed with a Project Manager, Environmental Specialist, Social Specialist, Monitoring and Evaluation Specialist, and a technical support team comprising engineers.

Fiduciary responsibilities for the project will be managed by the Ministry of Finance's TSU, which currently oversees all World Bank-financed projects in Montenegro and has demonstrated effectiveness in this role. The Technical Services Unit (TSU), housed within the Ministry of Finance, will be responsible for all fiduciary functions, including procurement and financial management. The TSU will manage procurement processes, maintain accounting records, prepare interim financial reports, and ensure compliance with World Bank Procurement Regulations and Financial Management requirements, ensuring transparency, efficiency, and sound financial control.

Monitoring and Evaluation activities will be managed by the PIU, which will be responsible for collecting, analyzing, and reporting data in line with the Project Results Framework. This includes baseline assessments, mid-term reviews, final evaluations, beneficiary satisfaction surveys, and monitoring of environmental and social impacts.

The table below summarizes the roles and responsibilities of the relevant parties to ensure the effective implementation of the LMP during the construction and operation phases. During the construction phase, PIU (PROCON) is ultimately responsible for the overall oversight of the Project and the LMP, monitors the performance of the contractor, coordinates monitoring activities with the supervision consultant and the World Bank, and acts as the final authority for grievances that cannot be resolved at the contractor level. The construction supervision consultant oversees the day-to-day implementation of LMP requirements on-site, while the construction contractor is responsible for implementing labour management practices in compliance with national legislation and contractual obligations, carrying out monitoring and reporting activities, and implementing corrective actions in case of non-compliances. The contractor's E&S staff support on-site monitoring and reporting related to labour conditions, working conditions, and occupational health and safety. During the operation phase, the respective subproject operator or facility management entity is responsible for ensuring long-term compliance with national labour legislation and ESS2 requirements, monitoring labour conditions, operating the grievance mechanism, and ensuring the continuation of fair labour practices. For detailed information on the roles and responsibilities of the parties, please refer to

Table 1 — Roles and Responsibilities for Labour Management below.

Table 1 — Roles and Responsibilities for Labour Management

Entity	Key Labour Management Responsibilities
Ministry of Ecology, Sustainable Development and Northern Region Development (MERS)	Overall policy oversight; ensuring legal compliance with national labour law; signing-off on E&S instruments
Ministry of Agriculture, Forestry and Water Management (MAFWM)	Co-oversight for water sector components; policy and regulatory alignment
PIU — PROCON	Day-to-day LMP implementation and monitoring; managing PIU direct workers; supervising contractors' compliance; operating the WGM; reporting to the World Bank
Technical Services Unit (TSU) — Ministry of Finance	Fiduciary oversight; ensuring labour-related contract provisions are included in procurement documents; reviewing contractor labour compliance as part of contract management
Environmental and Social Specialists (PIU)	Leading OHS inspections; reviewing C-ESMPs and OHS plans; monitoring WGM and KPIs; preparing E&S progress reports
Social Specialist (PIU)	Managing grievances from workers; conducting worker awareness sessions on rights, GRM, and CoC; monitoring SEA/SH risk
Contractors and Subcontractors	Complying with this LMP and national law; preparing and implementing C-ESMPs and OHS plans; operating site-level grievance logs; submitting monthly labour reports to PIU
Supervision Consultants	Monitoring contractor compliance with labour and OHS requirements on-site; reporting non-compliance to PIU

5. Labour Management

5.1 Project Workers

WASEC Phase 1 involves multi-site civil works across 21 priority subprojects spanning numerous municipalities (including Pljevlja, Nikšić, Berane, and others), alongside technical assistance, institutional strengthening, and project management activities. The following worker categories are anticipated, consistent with World Bank ESS2.

(i) Direct Workers

Direct workers are those employed or engaged directly by the project's implementing entities (PROCON/PIU and TSU). They include:

- PIU staff (Project Manager, Environmental Specialist, Social Specialist, M&E Specialist, technical support staff) — civil servants or contracted personnel employed by PROCON;
- TSU staff assigned for fiduciary and procurement support — civil servants within the Ministry of Finance;
- Employees of Regional Water Utility;
- Individual consultants engaged directly by PIU for technical, environmental, social, legal, and advisory services.
- Direct workers are governed by their existing employment contracts, Montenegrin labour law, and applicable World Bank ESS2 requirements. PIU will maintain updated records of all direct workers.

(ii) Contracted Workers

The largest category of project workers will be contracted workers — individuals employed by third-party contractors and subcontractors engaged to carry out civil works under Components 1 and 2. Activities include:

- Rehabilitation and expansion of water supply systems (pipelines, pumping stations, reservoirs);
- Construction of sewer networks connecting households to existing wastewater treatment plants;
- Replacement of asbestos-containing pipes;
- Expansion of water treatment capacity at Lake Skadar (Sub-component 2.1);
- Modernization of decentralized water services in rural communities.

Most civil works are expected to use local contractors, given the dispersed, municipality-level nature of subprojects. For larger or more technically complex subprojects (particularly the Lake Skadar coastal water security works), non-local or specialized workers may be required. The exact number of contracted workers has not yet been finalized, as individual subproject designs are still being developed. PIU will update workforce estimates as procurement progresses.

All contracts with contractors must incorporate this LMP's requirements, include ESS2-compliant labour clauses, and require contractors to implement their own site-level Labour Management Procedures consistent with this document.

(iii) Primary Supply Workers

The project is not expected to establish dedicated primary supply chains. Materials (pipes, concrete, construction aggregates, equipment) will be procured through regular market suppliers. Primary

supply worker risks are therefore assessed as low. However, PIU will include supply chain monitoring provisions in contractor agreements, particularly for materials that carry elevated supply chain risks (see Section 5.6).

5.2 Minimum Age and Child Labour

The minimum age for employment on this project is 18 years for all site-based and construction activities, and for any work involving hazardous conditions (including asbestos handling, confined spaces, heavy machinery). This is consistent with the hazardous nature of the works, ILO Convention No. 138, ILO Convention No. 182, and World Bank ESS2.

Contractors must verify the age of all workers prior to engagement and maintain records. Random age verification checks will be conducted by the PIU's Environmental and Social Specialist. Discovery of underage workers on any project site will be treated as a serious non-compliance requiring immediate remediation and reporting to PIU and the World Bank.

5.3 Equal Opportunity and Non-Discrimination

All project workers are entitled to equal treatment regardless of gender, age, ethnicity, religion, disability, marital status, sexual orientation, or any other protected characteristic. Discrimination in hiring, remuneration, working conditions, promotion, or termination is prohibited.

PIU and all contractors must implement equal opportunity principles in recruitment, giving particular attention to:

- Non-discriminatory job advertising and selection criteria;
- Equal pay for equal work;
- Accessible working arrangements where feasible for persons with disabilities;
- Gender-responsive recruitment practices to encourage women's participation in the project workforce, including in supervisory and technical roles.

5.4 Forced Labour

All forms of forced, compulsory, or trafficked labour are strictly prohibited. Workers must engage voluntarily, must be free to terminate their employment with reasonable notice, and must not have their identity documents confiscated. Contractors must not charge workers recruitment fees.

5.5 Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) Risks

Given the multi-site, construction-intensive nature of WASEC — and the potential for limited labour influx in rural or coastal communities — the project carries a moderate SEA/SH risk.

All contractors must:

- Include SEA/SH prohibitions in the Code of Conduct, signed individually by each worker;
- Designate a focal point responsible for receiving and managing SEA/SH complaints;
- Provide mandatory awareness training on SEA/SH to all site workers prior to work commencement.

The WGM (Section 5.17) includes a dedicated, confidential, survivor-centered channel for SEA/SH grievances, consistent with the project's SEP. PIU's Social Specialist is responsible for handling all SEA/SH worker complaints. SEA/SH incidents must be reported to the World Bank in accordance with the ESCP.

5.6 Supply Chain

Although primary supply chains are not dedicated, certain materials used in this project — particularly pipes (including legacy asbestos-containing pipes being replaced), construction aggregates, and chemicals used in water treatment — carry environmental and labour risks requiring oversight.

Contractors must:

- Source materials only from reputable, licensed suppliers;
- Confirm that suppliers comply with national labour law (no child or forced labour);
- Provide documentation of material sourcing upon PIU request.

PIU will include supply chain due diligence requirements in procurement documents and will conduct periodic spot-checks of high-risk material sourcing.

5.7 Health and Safety

OHS risk profile

WASEC involves multi-site civil works across the country, creating a range of occupational health and safety risks. The key risks include:

- Asbestos exposure: The replacement of asbestos-containing pipes is an explicitly identified project activity. This is the highest-priority OHS risk and requires specialized protocols (see below).
- Physical hazards: Excavation, trenching, pipeline installation, heavy machinery operation, working at heights, traffic conflicts at construction sites.
- Confined space risks: Work in existing manholes, chambers, and underground structures.
- Waterborne biological risks: Relevant particularly during wastewater infrastructure construction and for operations staff at treatment facilities.
- Community interface risks: Dispersed construction sites in populated areas, with risks of dust, noise, vibration, and temporary utility disruptions.
- Sludge management: Works at or near wastewater treatment plants involve sludge handling, which presents biological and chemical hazards.

General OHS Requirements

All contractors must:

- Prepare and implement a site-specific OHS Plan as part of their C-ESMP, covering hazard identification, risk assessment, emergency response, and accident reporting;
- Designate a qualified OHS Officer for each active construction site;
- Provide all necessary Personal Protective Equipment (PPE) free of charge to all workers. PPE must be appropriate to the specific risk (e.g., respiratory protection for asbestos works, hearing protection for high-noise environments, high-visibility clothing for traffic interfaces);
- Ensure all workers undergo medical examinations prior to commencing work, with follow-up periodic health surveillance where exposure to specific hazards (biological agents, asbestos) is anticipated;
- Maintain first aid kits on all sites and ensure at least one qualified first-aider is present during all working hours;

- Report any significant accident or near-miss to PIU within 24 hours of occurrence. Fatal accidents must be reported to the World Bank immediately.

Asbestos-Specific Protocol

Given the explicit identification of asbestos pipe replacement as a project activity, the following specific requirements apply, consistent with ILO Convention No. 162:

- Contractors must prepare a dedicated Asbestos Management Plan (AMP) as part of their C-ESMP, to be reviewed and approved by PIU before works commence;
- All workers involved in asbestos removal, handling, or disposal must receive specialized asbestos awareness and safe handling training prior to works;
- Appropriate respiratory protection and full personal protective equipment must be provided and used at all times during asbestos works;
- Removed asbestos-containing materials must be wetted, double-bagged in sealed containers, clearly labelled, and transported and disposed of by a licensed hazardous waste contractor at an authorized disposal facility;
- No asbestos-containing material may be reused or left uncovered on-site;
- Medical surveillance for workers exposed to asbestos must be arranged and documented.

5.8 Workers' Welfare

Contractors are responsible for ensuring adequate welfare facilities for their workers. Where workers are not commuting daily from their home communities, contractors must provide or arrange:

- Adequate accommodation (clean, safe, gender-segregated where necessary);
- Access to potable water, sanitation, and food on-site;
- Access to medical services.

PIU will verify welfare provisions through site visits.

5.9 Freedom of Association

All project workers have the right to form or join trade unions or other representative organizations of their choice, without discrimination, retaliation, or interference, consistent with ILO Convention No. 87 and Montenegro's Labour Law. Contractors must engage in good faith with any worker representatives or trade union bodies that approach them. Workers must not be penalized for union membership or participation.

5.10 Local Recruitment

The project prioritizes local recruitment — hiring workers from municipalities where subprojects are located. Local recruitment reduces labour influx risks, supports local livelihoods, and reduces the need for worker accommodation. Contractors must document their recruitment approach and demonstrate good-faith local hiring efforts to PIU. Where local skills are unavailable (e.g., for asbestos removal or specialized water treatment works), non-local or specialized workers may be brought in, subject to appropriate welfare provisions.

5.11 Working Conditions and Labour Influx

Given the dispersed, municipality-level nature of the civil works and the expected use of local contractors, significant labour influx is not anticipated. Most workers are expected to commute daily. However, for the Lake Skadar coastal water security subproject (Sub-component 2.1) and other larger subprojects, non-local workers may be involved.

Where labour influx occurs, contractors must:

- Establish a Code of Conduct and require individual worker sign-off;
- Provide SEA/SH awareness training before work commences;
- Ensure workers do not occupy community infrastructure or resources;
- Coordinate with PIU and local authorities on any community interaction.

5.12 Disciplinary Measures

Contractors must maintain a written disciplinary procedure, communicated to all workers at the time of engagement. Disciplinary measures must be proportionate, transparent, and non-retaliatory. Workers must be informed of the reason for any disciplinary action and have an opportunity to respond before a decision is made. Physical punishment, verbal abuse, and humiliation are strictly prohibited. Immediate dismissal is required for any worker found to have engaged in SEA/SH, child or forced labour, or violence.

5.13 Working Hours and Overtime

Standard working hours are 8 hours per day, 5 days per week, consistent with Montenegro's Labour Law. Overtime must be voluntary, consented to by the worker, and compensated at legally mandated rates. Total working time must remain within the legal limits established by national legislation. Contractors must maintain accurate time records for all workers. Commercial vehicle drivers must comply with the AETR Agreement on driving and rest times.

5.14 Holidays and Weekly Leave

All project workers are entitled to weekly rest days and official public holidays in accordance with Montenegrin law. Workers are also entitled to annual leave in accordance with their employment contracts and applicable law.

5.15 Sick Leave

Workers are entitled to sick leave in accordance with Montenegrin labour law. Sick leave compensation is provided upon submission of a medical certificate. Contractors must not penalize workers for legitimate sick leave.

5.16 Social Security

All workers employed by contractors on this project must be officially registered with the competent social security institutions from the first day of employment, in accordance with the Labour Law (Zakon o radu).

This includes registration for:

- Pension and disability insurance;
- Health insurance;
- Unemployment insurance.

Notifications must be submitted to the Tax Administration and relevant social insurance funds prior to or at the start of employment. PIU will verify social security compliance as part of contractor monitoring. Failure to register workers for social security is a serious non-compliance.

5.17 Workers' Grievance Mechanism (WGM)

A Grievance Mechanism for civil servants in MNE is already established in the form of the Appeal Commission for workers' complaints. The Civil Service Appeal Commission is an independent and autonomous authority for performing activities stipulated under the Law on Civil Service of MNE. The Commission is competent for decision making on all appeals lodged against decisions with regard to the rights, obligations and responsibilities of civil servants. The deadline for responses to appeals cannot be later than 30 days from the day the appeal is received. The appeal shall be filed through the first instance body and may be submitted directly or by post to the Appeal Commission. The Law on Civil Service of MNE does not specify anything further about procedure of grievance mechanism, confidentiality, etc.²

Purpose and Principles

The WASEC Project will establish a dedicated Workers' Grievance Mechanism (W-GRM) to enable all project workers to raise concerns regarding their working conditions, health and safety, labor rights, and other employment-related matters in a transparent, confidential, and non-retaliatory manner.

All project workers — regardless of their employment category or contract type — have the right to raise concerns about their working conditions, rights, or any other labour-related matter without fear of retaliation. The WGM is free of charge, accessible, confidential (to the extent possible), and responsive.

The Workers' Grievance Mechanism shall be simple, transparent, and accessible to all project workers. Key features of the mechanism will include:

- A straightforward process allowing for the submission of comments, complaints, proposals, or informal grievances;
- Full confidentiality and impartiality, ensuring that workers are free to raise grievances without fear of reprisal;
- Reasonable and clear timeframes for processing grievances, aligned with national labor laws;
- Equal treatment of anonymous grievances and those submitted with the worker's identity;
- The right of workers to be accompanied by a colleague, trade union representative, or workers' council member during grievance submission or resolution processes.

Grievances will be acknowledged within three (3) working days and responded to or resolved within fifteen (15) working days wherever possible. Workers will also have the right to escalate grievances to a higher level within the PIU if they are not satisfied with the initial resolution.

The grievance mechanism will not restrict workers' access to judicial or administrative remedies available under national law or collective bargaining agreements. It will function as an accessible first step for resolving workplace issues promptly and efficiently, while respecting workers' rights to pursue alternative legal channels if desired.

² Official Gazette of MNE, No. 2/18 and 34/19

PIU-Administered WGM

PIU (PROCON) operates the project-level WGM. Workers may submit grievances through the following channels:

- Email: grievances_wasec@procon.me
- Telephone: +382 20 201 545
- Written submission: Delivered to PIU or to municipal offices where subprojects are located
- In-person: At PIU offices or at designated site-level contact points

Anonymous grievances are accepted and will be investigated to the extent feasible.

Processing Timelines:

- Acknowledgment: within 3 working days of receipt
- Screening and categorization: within 5 working days
- Resolution: within 15 working days (extendable to 30 working days for complex cases, with notification to the complainant)

Workers have the right to be accompanied by a trade union representative or workers' council member during any grievance process. Workers may access the national court system or other legal remedies at any time, without the WGM process being a prerequisite.

SEA/SH/GBV Grievances

The Project's grievance mechanism will also specifically address grievances related to gender-based violence (GBV), sexual exploitation and abuse (SEA), and sexual harassment (SH). SEA/SH/GBV complaints are handled through a separate, dedicated protocol, ensuring the availability of confidential reporting channels, survivor-centered support, and specialized handling of sensitive complaints.

PIU's Social Specialist is the designated handler. SEA/SH complainants are not required to use the standard grievance channels and may submit reports through any preferred means, including anonymously. Identity of survivors is protected at all times.

Contractor Requirements

Each contractor will be required to:

- Establish and maintain an internal workers' grievance mechanism consistent with ESS2 and the project's W-GRM principles.
- Include a dedicated focal point for grievance handling within their Human Resources team.
- Inform all workers of grievance procedures at hiring, including during induction and through visible postings on site.
- Provide periodic grievance summaries and resolution reports to the Supervision Consultant and PIU.
- Ensure that workplace SEA/SH complaints are referred confidentially to the designated PIU focal point, with no retaliation or bias.

Contractor grievance mechanisms must be included in the Contractor's Labor Management Plans (CLMPs), which will be reviewed and approved by the PIU prior to mobilization.

Monitoring and Reporting

PIU's Social Specialist tracks all WGM submissions, responses, and outcomes in a centralized log. Grievance data is disaggregated by type, gender, and resolution status. A summary is included in quarterly E&S monitoring reports submitted to the World Bank.

6. Mitigation Measures for Labour-Related Risks and Impacts

6.1 Mitigation Measures Comprising both Construction and Operational Phases

Mitigation measures listed below will be implemented during both construction and operational phases of the Project. The operational phase of the sub-project is not expected to result in significant long-term changes in regional population dynamics or labor demand. Routine operation and maintenance activities will be carried out by the respective subproject operator or facility management entity using existing personnel or small teams of specialists, without the need for a large workforce on site. As such, labour-related impacts during the operational phase will be minimal and fully manageable within existing institutional capacities. Mitigation measures are following:

- Ensure that Project workers are provided with clear and understandable information regarding their terms and conditions of employment at the beginning of the employment relationship and whenever material changes occur.
- Ensure employment conditions are in compliance with national labour legislation, including rights related to wages, working hours, overtime, compensation, benefits, leave, and other entitlements, and aligned with ESS2.
- Ensure that all workers are paid on a regular basis and in accordance with national law and the LMP.
- Provide adequate periods of weekly rest, annual leave, sick leave, maternity and family leave as required by national legislation and outlined in the LMP.
- Ensure that employment decisions are not based on personal characteristics unrelated to job requirements.
- Promote equal opportunity and fair treatment across all employment aspects, including recruitment, compensation, training access, promotion, termination, and disciplinary action.
- Take measures to prevent the employment of children below the minimum legal age (18) as specified in the Project LMP and ESS2 requirements.
- The working age (18 years) should be explicitly stated and guaranteed in supply chain and subcontractor agreements. The employment of persons below this age should be prohibited.
- Contractors will act with the awareness of social responsibility to prevent child labour as required by legislation and regulations.
- Contractors will not employ forced labour, which consists of work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. This covers involuntary or compulsory labour, such as indentured labour, bonded labour or similar labour-contracting arrangements, or trafficked person.
- Contractors should keep the best levels of health, safety and hygiene for its workers, guaranteeing the needed prevention and protection measures to avoid or reduce professional risks to a minimum.

- Contractors will provide adequate (correct size, suitable and approved) PPE free of charge to all employees on site. In addition to the basic PPE to be provided to all employees on site, required specific PPE will be provided to all profession groups.
- The right of workers to form or join organizations of their free choice is fundamental. The commitment not to discriminate or retaliate against workers who join or attempt to join organizations or engage in collective bargaining is reserved. It is essential not to interfere with the functioning of trade unions or other representative organizations.
- Contractors will engage with workers and their representatives in accordance with national laws.
- Contractors may provide additional employee benefits such as health insurance or relocation support, which will be outlined in the internal Human Resources Policy.
- Sick leave will be compensated in accordance with national labour legislation, conditional upon submission of valid medical documentation.
- Contractors shall adopt a zero-tolerance policy for all forms of violence, harassment, and intimidation, including gender-based violence and harassment (GBVH), and shall ensure that all disciplinary actions are carried out in full compliance with the Labour Law of Montenegro and other applicable national legislation, as well as relevant international standards.
- Disciplinary procedures shall be clearly defined, applied equally, and transparently communicated to all employees. Allegations of misconduct shall be assessed objectively, documented if necessary, and proportionately addressed in line with progressive disciplinary principles.
- Overtime work shall be voluntary and implemented in accordance with the Labour Law of Montenegro. Overtime shall be limited in duration and shall not exceed the legal daily, weekly, and annual limits prescribed by national legislation. Overtime work shall be compensated with an increased wage rate as required by law or, where applicable, with compensatory time off. Under no circumstances shall total daily working time exceed the maximum limits set out in the Labour Law of Montenegro. Actions that justify immediate termination (e.g., theft, violence, serious misconduct) must be clearly defined in internal regulations and communicated to employees.
- Driving times and rest periods for commercial vehicle drivers shall comply with the road transport legislation in force in Montenegro and with the provisions of the European Agreement concerning the Work of Crews of Vehicles engaged in International Road Transport (AETR) Agreement, to which Montenegro is a party. This includes limits on consecutive driving times as well as minimum daily and weekly rest periods. Employees cannot be forced to work on official holidays without their consent.
- Contractors shall adopt a voluntary local recruitment approach throughout the construction phase. Local recruitment efforts will prioritize unskilled and semi-skilled labour from nearby districts in the relevant subproject areas. Where qualified candidates are not available, recruitment may extend to other Regions.

- Contractors will promote inclusive recruitment by encouraging women's participation in the workforce.
- The recruitment process and related commitments will be monitored by the MESDNRD/CSC. If local hiring targets are not achieved, the Contractors shall provide documentation of the efforts made and reasons for non-achievement.
- Contractors shall establish a Workers' Grievance Mechanism (WGM) to operate throughout the construction period of all MWSIP subprojects. This mechanism will allow all workers - including those employed by subcontractors- to safely raise concerns or complaints related to working conditions, labour rights, workplace behaviour, or management practices.
- The WGM will be introduced to all workers during induction, with visual guidance and signage placed in accessible common areas. Workers will have the option to submit complaints through elected worker representatives, via physical complaint boxes, or through online channels, including anonymous submissions. At least one male and one female grievance focal point shall be designated to increase accessibility and trust.
- Contractors shall ensure that all workers have access to basic health care services, including first aid and emergency medical support, in accordance with occupational health and safety requirements.
- On-site first aid kits and trained personnel shall be available at all times. In case of injuries or health issues, workers shall be referred to nearby public health facilities located irrelevant subproject area, under the coordination of the Contractor's designated health and safety officer.
- Contractors are responsible for minimizing health and safety risks associated with construction activities, including those related to worksite accidents, commuting, and exposure to potential hazards.
- PIU will monitor the implementation of these measures throughout the project implementation.

7. Training

All project workers must receive appropriate training commensurate with their role and risk exposure. The following training requirements apply:

For all workers (prior to commencing work on site):

- General OHS induction covering site rules, hazard identification, emergency procedures, and first aid;
- Code of Conduct awareness, including SEA/SH prohibitions and the WGM;
- Workers' rights under national law and ESS2, including the right to refuse unsafe work.

For workers in construction and civil works:

- Specific task-based safety training (excavation safety, machinery operation, working at heights, confined space entry, as applicable);
- Traffic management and pedestrian safety where works interface with public roads.

For workers involved in asbestos pipe replacement, if applicable:

- Specialized asbestos awareness training prior to any asbestos-related work;
- Correct use and disposal of asbestos-specific PPE;
- Emergency procedures in case of accidental asbestos release.

For PIU/PROCON staff:

- ESS2 and labour management requirements;
- WGM operation and case management;
- SEA/SH survivor-centered response protocols.

Contractors must maintain records of all training delivered, including attendance records. PIU will review training records as part of monitoring visits. Training must be provided in Montenegrin and in a language understood by all workers, including any non-national workers.

8. Monitoring and Reporting

Within the scope of this Labour Management Plan, regular monitoring activities will be conducted during both the construction and operation phases to evaluate the implementation of labour-related mitigation measures and ensure compliance with national legislation, World Bank ESS2 and IFC Performance Standard 2.

These monitoring activities are detailed in the Table 2 below, which outlines key parameters, methods, frequency, and responsible parties.

Table 2 Labour Management Monitoring

Parameter	Monitoring Method	Monitoring Frequency	Responsible Parties
Minimum Age Verification	Review of identity documents and recruitment records during hiring and periodic audits	When needed	Contractors
Prevention of Forced or Involuntary Labor	Interviews with workers and site inspections; anonymous feedback mechanisms	Quarterly	Contractors
Working Conditions and OHS Compliance	Workplace inspections, safety audits, and OHS documentation review (incident logs, risk assessments, PPE usage, etc.)	Monthly	Contractors
Grievance Management (Labor-Related)	Monitoring grievance logbooks, evaluating trends, verifying proper resolution and escalation	Monthly	Contractors
Discrimination and Harassment Monitoring	Review of grievance types and outcomes, interviews with workers (including vulnerable groups)	Quarterly	Contractors
Training and Capacity Building	Review of training records (attendance sheets, materials used, topics covered, refresher logs)	Quarterly	Contractors
Subcontractor Compliance with LMP	Periodic audits and reporting from subcontractors; compliance checklist verification	Monthly	Contractors
Employment Terms and Contracts	Random checks of employment contracts, working hours, wages, and benefits vs. national labor law	Monthly	Contractors
Worker Engagement and Communication	Worker feedback sessions, satisfaction surveys, and toolbox talks related to labor rights	After major activities / Monthly	Contractors

Findings from monitoring activities will be documented in periodic reports. Based on these findings, corrective and preventive measures will be developed, and necessary updates will be incorporated into this Plan, including revisions to training and communication strategies.

8.1. Key Performance Indicators

To support performance management and continuous improvement, a set of key performance indicators (KPIs) will be tracked as outlined in the Labor Management Plan.

Table 3 Key Performance Indicators

Key Performance Indicator	Target	Frequency	Responsible Parties
Percentage of worker grievances closed out within the target timeframe	100%	Monthly	Contractors and its sub-contractor
Compliance with national labor laws and IFC labor standards	100%	Monthly	Contractors and its sub-contractor
Number of unresolved health and safety incidents	0	Monthly	Contractors and its sub-contractor
Availability and distribution of required Personal Protective Equipment (PPE)	100%	Monthly	Contractors and its sub-contractor
Worker satisfaction rate based on anonymous surveys or feedback mechanisms	100%	Monthly	Contractors and its sub-contractor

8.2. Reporting

Labour management reporting will be conducted throughout the implementation phase of the Project to verify implementation of the LMP and to support adaptive management and continuous improvement. Reports will be prepared by the Contractor and reviewed by the PIU. Labour-related reports will include, as applicable:

- Results of site inspections, audits, and monitoring activities related to labour conditions, occupational health and safety, and workforce management
- Identified non-compliances, corrective and preventive actions taken, and follow-up status
- Records of workforce management, including employment contracts, working hours, wage payments, training attendance, and medical clearance where required
- Records and analysis of worker grievances, including number of grievances received, types of grievances, resolution status, and response time
- Root cause analysis and corrective actions for serious labour-related incidents, including occupational accidents, exposure incidents, harassment cases, or repeated violations.

All worker feedback, complaints, and grievances will be addressed through the WGM. Grievances will be recorded, investigated, and resolved in a timely and confidential manner, without retaliation. Trends and recurring issues identified through grievance records and monitoring results will be used to inform improvements to labour practices, training programs, and risk mitigation measures.

9. Audit and Review

The PIU will conduct at least one formal audit of labour management practices per year, covering a representative sample of active construction sites. The audit will assess contractor compliance with OHS plans, CoC, working conditions, wage payment, social security registration, WGM operation, and training records.

The LMP will be reviewed and updated:

- Within 6 months of project effectiveness;
- When there is a material change in project scope or activities;
- When audit or monitoring findings indicate a need for revised measures;
- When new risks are identified.

Findings of audits and reviews will be disclosed to the World Bank and shared with relevant contractors for corrective action.

ANNEX

ANNEX I: LABOR CONDITIONS COMPLIANCE REPORT TEMPLATE WITH ESS2 FOR THIRD PARTIES ENGAGING CONTRACTED WORKERS

Task Name:	
Contract Reference No.:	
Contract Period:	Start Date (D/M/Y) — End Date (D/M/Y)
Contractor / Service Provider:	
Reporting Period:	
Report Date:	

REPORT ON ADHERENCE TO LABOR AND WORKING CONDITIONS

Company worker statistics:

- Total number of workers by gender: Men ____ / Women ____
- Number of workers with employment contracts: ____
- Number of workers without employment contracts: ____
- Number of workers with social, pension, and health insurance: ____
- Number of workers receiving wages at least monthly: ____
- Number of workers who left the company during reporting period: ____
- Number of workers employed in reporting period: ____
- Average hours worked per worker (monthly): ____
- Total overtime hours (monthly average per worker): ____

Work Injuries (reporting period and cumulative since contract start): ____

Fatalities at work (reporting period and cumulative): ____

Reported violence cases: ____

Reported harassment/abuse cases: ____

Availability of accessible and functional worker grievance mechanism: ☐ Yes ☐ No

Number of grievances submitted to mechanism (reporting period and cumulative): ____

Number of grievances resolved by mechanism (reporting period and cumulative): ____

Number of filed lawsuits related to labor, employment, and OHS: ____

Number of disputes settled amicably/referred to voluntary arbitration: ____

Number of labor/OHS inspectorate visits: ____

Project Worker Statistics:

- Total project workers: ____
- Project workers with employment/service contracts: ____
- Project workers without contracts: ____
- Project workers with social/pension/health insurance (with registry confirmation): ____

	Condition and Timeline	Yes / No	Remarks
1	All project workers have a written employment contract or engagement agreement.	☐ Yes ☐ No	If "No", please specify and explain.
2	All project workers receive wages at least once per month.	☐ Yes ☐ No	If "No", please specify and explain.
3	All project workers worked 8 hours per day and 40 hours per week.	☐ Yes ☐ No	If "No", please specify and explain.
4	All project workers had regular daily and weekly rest periods.	☐ Yes ☐ No	If "No", please specify and explain.
5	Number of project workers whose employment contracts were terminated in accordance with national labour law and ESS2.	☐ Yes ☐ No	If "Yes", specify the number and explain the termination conditions.
6	Number of project workers who participated in occupational health and safety (OHS) training programmes.	☐ Yes ☐ No	If "Yes", specify the number and provide details.
7	Project workers were granted leave entitlements to which they are legally entitled.	☐ Yes ☐ No	If "Yes", specify the type and number of leave days.
8	Project workers experienced occupational accidents resulting in injuries or fatalities.	☐ Yes ☐ No	If "Yes", specify the number and provide details.
9	Project workers reported cases of discrimination, harassment, sexual harassment, or violations of labour legislation.	☐ Yes ☐ No	If "Yes", specify the number and provide details.
10	All project workers are over 18 years of age.	☐ Yes ☐ No	If "No", specify the number and explain.
11	Project workers submitted grievances or initiated voluntary arbitration/legal proceedings to resolve disputes.	☐ Yes ☐ No	If "Yes", specify the number and provide details.
12	During the reporting period, there were incidents related to non-compliance with the Labor Management Procedures (LMP).	☐ Yes ☐ No	If "Yes", specify the number and provide details.

ANNEX II: – Third Parties’ (Prospective Contractors, Service Providers and Suppliers) Statement of Compliance with Labor Legislation Provisions and the Project’s LMP in line with ESS2 “Labor and Working Conditions”

Date and place of issuance: _____

Name and address of the Declarant (bidder/supplier): _____

STATEMENT OF COMPLIANCE WITH LAWS, REGULATIONS AND THE PROJECT LMP

We hereby declare that:

- We comply with all applicable national laws* and regulations governing employment, labor and employee relations, working conditions and occupational health and safety, as well as the relevant requirements of ESS2 “Labor and Working Conditions”.
- We are committed to providing a safe and healthy working environment for our employees and all workers engaged for the purposes of the Project, and to implementing all prescribed occupational health and safety measures in accordance with national legislation and the Project’s LMP.
- We do not tolerate any form of child labor, forced labor or work in conditions analogous to slavery, and we commit not to engage any person under the age of 18 for work related to the Project, in line with applicable legislation and ESS2.
- We prohibit any form of harassment, including sexual harassment and abuse, violence and gender-based violence at work, and we prohibit any direct or indirect discrimination against any employee or group of employees on any ground and for any reason.
- We commit to respect and implement the Project Code of Conduct, including specific provisions on the prevention of sexual exploitation and abuse (SEA) and sexual harassment (SH), and to inform all our workers, subcontractors and suppliers about this Code of Conduct and ensure that they sign it.
- We confirm that we will establish and maintain records related to workers engaged for the purposes of the Project (contracts, working hours, payments, trainings, occupational injuries, occupational diseases, incidents and near-miss events) in accordance with the requirements of ESS2 and the Project’s LMP.
- We confirm that the workers engaged for the purposes of the Project have access to the Grievance Mechanism (GM) for project workers, as defined in the Project’s LMP, and that we will inform them about the procedures for submitting grievances and that no worker will face retaliation for submitting a grievance or participating in the grievance resolution process.
- We commit to ensure that the same obligations are applied to all subcontractors and suppliers we engage for the purposes of the Project, including the prohibition of child and forced labor, the prohibition of harassment and discrimination, compliance with the Code of Conduct and access to the GM for project workers.

We declare that we expect to sign a contract with the Employer/Investor and that we undertake to fully implement the Labor Management Procedures (LMP) applicable to the Project and to integrate them into our internal policies and practices. We understand that failure to comply with the above-mentioned obligations may result in termination of the contract and/or exclusion from further participation in the Project.

Signature: _____

Name: _____

Position: _____

ANNEX III:: CONTRACTOR'S CODE OF CONDUCT FOR PROJECT WORKERS

We are the Contractor, [insert name of Contractor]. We have signed a contract with [insert name of Employer] for [insert description of Works]. These Works will be carried out at [insert name of site and any other locations where Works will be performed]. Under our Contract we are required to implement measures to address environmental and social risks related to the Works, including risks of sexual exploitation and abuse (SEA) and sexual harassment (SH).

This Code of Conduct forms part of our measures to address environmental and social risks associated with the Works. It applies to all our staff, workers and other personnel at the construction site or at any other place where the Works are performed. It also applies to the staff of any Subcontractor and any other personnel assisting us in carrying out the Works. All such persons are referred to as "Contractor's Personnel" and are subject to this Code of Conduct.

Our workplace is an environment where unsafe, offensive, abusive or violent behavior will not be tolerated and where all persons should feel comfortable raising questions or concerns without fear of retaliation.

REQUIRED CONDUCT

Contractor's Personnel shall:

1. Perform their duties competently and diligently.
2. Comply with this Code of Conduct and with all applicable laws, regulations and other requirements, including requirements for protecting the health, safety and welfare of other Contractor's Personnel and any other person.
3. Maintain a safe working environment, including by:
 - ensuring that workplaces, machinery, equipment and processes under their control are safe and without risk to health;
 - wearing the required personal protective equipment;
 - using appropriate measures related to chemical, physical and biological substances and agents; and
 - following applicable emergency operating procedures.
4. Report any work situation that they believe is not safe or healthy and leave any work situation which they reasonably believe presents an imminent and serious danger to their life or health.
5. Treat all people with respect and not discriminate against particular groups such as women, persons with disabilities, migrant workers or children.
6. Not engage in any form of sexual harassment, including unwelcome sexual advances, requests for sexual favors and other unwelcome verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel or with community members.
7. Not engage in sexual exploitation, meaning any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including but not limited to profiting monetarily, socially or politically from the sexual exploitation of another. In projects/operations financed by the World Bank, sexual exploitation occurs when access to goods, works, consulting or non-consulting services financed by the Bank, or to benefits thereof, is used to obtain a sexual gain.
8. Not engage in sexual abuse, meaning actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual abuse includes rape, attempted rape and any other non-consensual sexual act.

9. Not engage in any sexual activity with anyone under the age of 18 years, regardless of the age of majority or consent locally. Mistaken belief regarding the age of the child is not a defense. The only exception is where Contractor's Personnel are legally married to a person under 18 years in accordance with national law, and such marriage was entered into before their employment under the Project.
10. Complete the relevant training courses to be provided in relation to environmental and social aspects of the Contract, including health and safety, SEA/SH and violence against children.
11. Report any breaches of this Code of Conduct.
12. Not retaliate against any person who reports a breach of this Code of Conduct, whether to us, to the Employer or through the Project Grievance Mechanism.

REPORTING CONCERNS

If any person observes behavior that may be a breach of this Code of Conduct, or that otherwise causes concern, it should be raised immediately in one of the following ways:

1. Contact [insert name of the Contractor's Social/GBV Specialist or other designated person] in writing at [insert address], by phone at [insert number], or in person at [insert location]; or
2. Call [insert number] to reach the Contractor's helpline (if available) and leave a message.

The identity of the person making the report will be kept confidential, except where disclosure is required by national law. Anonymous complaints and allegations may also be submitted and will be considered appropriately. All reports of possible misconduct will be taken seriously, investigated and addressed as appropriate. Where needed, we will provide information about and facilitate access to support services for persons who have experienced alleged incidents.

There will be no retaliation against any person who, in good faith, raises a concern regarding any conduct prohibited by this Code of Conduct. Any such retaliation would itself constitute a breach of this Code of Conduct.

CONSEQUENCES OF BREACHING THE CODE OF CONDUCT

Any breach of this Code of Conduct by Contractor's Personnel may result in serious consequences, up to and including dismissal from employment and, where relevant, referral of the matter to the competent authorities.

FOR CONTRACTOR'S PERSONNEL

I acknowledge that I have received a copy of this Code of Conduct, written in a language that I understand. I understand that if I have any questions about this Code of Conduct, I can contact [insert name of Contractor's contact person with relevant experience in addressing gender-based violence] and ask for clarification.

Name of Contractor's Personnel: [insert name]

Signature: _____

Date (day month year): _____

Countersignature of the Contractor's Authorized Representative:

Signature: _____

Date (day month year): _____

ANNEX IV:: Ratified ILO Conventions

Adopted fundamental conventions

No.	Convention Name	Year of Adoption
1.	Convention concerning Forced or Compulsory Labour	1930
2.	Convention concerning Freedom of Association and Protection of the Right to Organise	1948
3.	Convention concerning the Application of the Principles of the Right to Organise and to Bargain Collectively	1949
4.	Convention concerning Equal Remuneration for Men and Women Workers for Work of Equal Value	1951
5.	Convention concerning the Abolition of Forced Labour	1957
6.	Convention concerning Discrimination in Respect of Employment and Occupation	1958
7.	Convention concerning Minimum Age for Admission to Employment	1973
8.	Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour	1999

Adopted fundamental conventions

No.	Convention Name	Year of Adoption
1.	Convention concerning Labour Inspection	1947
2.	Convention concerning Employment Policy	1964
3.	Convention concerning Labour Inspection in Agriculture	1969
4.	Convention concerning Tripartite Consultations to Promote the Implementation of International Labour Standards	1976

Adopted priority conventions

No.	Convention Name	Year of Adoption
1.	Convention concerning Unemployment	1919
2.	Convention concerning the Right of Association (Agriculture)	1921
3.	Convention concerning Workers' Compensation (Agriculture)	1921
4.	Convention concerning the Use of White Lead in Painting	1921
5.	Convention concerning Workmen's Compensation (Accidents)	1925
6.	Convention concerning Workmen's Compensation (Occupational Diseases)	1925
7.	Convention concerning Equality of Treatment (Accident Compensation)	1925
8.	Convention concerning Sickness Insurance (Agriculture)	1927
9.	Convention concerning Fee-Charging Employment Agencies	1948
10.	Convention concerning Night Work of Women	1948
11.	Convention concerning Night Work of Young Persons (Industry)	1948
12.	Convention concerning Social Security (Minimum Standards)	1952
13.	Convention concerning Weekly Rest (Commerce and Offices)	1957
14.	Convention concerning Minimum Wage Fixing	1970
15.	Convention concerning Holidays with Pay	1970
16.	Convention concerning Workers' Representatives	1971
17.	Convention concerning Occupational Cancer	1974

18.	Convention concerning Paid Educational Leave	1974
19.	Convention concerning Human Resources Development	1975
20.	Convention concerning the Working Environment (Air Pollution, Noise and Vibration)	1977
21.	Convention concerning the Promotion of Collective Bargaining	1981
22.	Convention concerning Occupational Safety and Health	1981
23.	Convention concerning Termination of Employment	1982
24.	Convention concerning Vocational Rehabilitation and Employment (Disabled Persons)	1983
25.	Convention concerning Occupational Health Services	1985
26.	Convention concerning the Prevention of Major Industrial Accidents	1993
27.	Convention concerning Part-Time Work	1994
28.	Convention concerning Safety and Health in Mines	1995
29.	Convention concerning the Revision of the Maternity Protection Convention	2000
30.	Convention concerning Safety and Health in Agriculture	2001