

KINGDOM OF CAMBODIA

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MINISTRY OF AGRICULTURE, FORESTRY AND FISHERY

**CAMBODIA INCLUSIVE LIVESTOCK VALUE CHAINS PROJECT
(CILVCP) (P180535)**

**LABOR MANAGEMENT PROCEDURES
(LMP)**

December 5, 2024

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ABBREVIATIONS

CILVCP	Cambodia Inclusive Livestock Value Chains Project
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESCAP	Environmental and Social Code of Practice
ESU	Environmental and Social Unit
GDAHP	General Directorate of Animal Health and Production
LMP	Labor Management Procedure
OHS	Occupational Health and Safety
RGC	Royal Government of Cambodia

1. INTRODUCTION

1.1 Project description

The World Bank will be supporting the General Directorate of Animal Health and Production/ Ministry of Agriculture, Forestry and Fisheries (MAFF) in implementing the Cambodia Inclusive Livestock Value Chains Project (CILVCP). The objective of the project is to sustainably improve livestock-based livelihoods and strengthen animal health services in target project locations. The project will support the following activities: Component 1: Promote Inclusive and Sustainable Livestock Value Chains; Component 2: Enhance Animal Production and Health Services; Component 3: Project Management, Monitoring, Evaluation, and Learning. The CILVCP gets a grant of \$20 million from the Global Agriculture and Food Security Program (GAFSP). The expected approval date for this project is 30 September 2024 and the expected closing date is 31 December 2030.

The project will cover Battambang, Tbong Khmum, and Kampong Speu provinces, chosen for their high-risk status —Battambang and Tbong Khmum for their cross-border entry points where Transboundary Animal Diseases (TADs) first appeared, and Kampong Speu for its high livestock density and animal trade. Around 30,000 direct beneficiaries will include farmers, staff of General Directorate of Animal Health and Production (GDAHP), Provincial Office of Animal Health and Production (POAHP), Ministry of Health (MoH), Ministry of Environment (MoE), Village Animal Health Workers (VAHWs), Commune Agriculture Officer (CAOs), traders, and agribusinesses, with 40 percent being female. The project will focus on high-potential smallholder farmers and lower-capacity producer groups interested in expanding their livestock businesses, with support provided mainly through Producer Groups (PGs). Approximately 20,000 farmers will benefit from training, grant co-financing for climate-smart technologies, and access to improved infrastructure, veterinary, and extension services. The remaining 10,000 beneficiaries will include farming households, agribusinesses, and traders. Small and Medium Enterprises (SMEs) collaborating with farmers and PGs will also receive support. The project will use transparent, participatory processes for beneficiary selection and will upgrade value chain infrastructure, such as slaughterhouses and markets, to meet higher safety and quality standards. Women will be a key focus, with efforts to enhance their livestock production skills, access to technology, and involvement in producer organization management.

1.2 Project components

Component 1: Promote Inclusive and Sustainable Livestock Value Chains

This component aims to sustainably improve the productivity of livestock production and orient farmers towards more commercialization. Such improvement will be done by promoting productivity-enhancing technology and practices, which also build resilience and reduce Greenhouse Gases (GHG) emissions, and by fostering market-driven commercialization approaches in selected livestock value chains. The activities under this component will contribute to increased returns to producers while enhancing resilience to climate shocks and reducing the GHG emission intensity of livestock production. The component will finance; (i) access to climate-smart technologies and practices, (ii) technical assistance (TA) to improve the organization of farmers and strengthen the operation of PGs, (iii) the rehabilitation and upgrade of value chain infrastructures, and (iv) facilitation of the linkage between PGs and agribusinesses.

Following comprehensive outreach activities to broaden awareness about the CILVCP, a detailed capacity assessment will determine the eligibility of groups for project support. The project will

directly support at least 100 PGs and reach 30,000 people with capacity-building activities, including awareness raising, training, and marketing support.

Sub-component 1.1: Enhancement of livestock productivity

Activities under this subcomponent will focus on improving livestock productivity and output volume while enhancing climate resilience and reducing the emission intensity of livestock production. The project will finance the following:

- a) Climate-smart technology and practice packages (PaTecs), which include improved breed, feed, and fodder production, rangeland management, GAHPs, manure management, and crop-livestock integration to increase productivity, build resilience of livestock, and reduce livestock GHG emissions intensity.
- b) Strengthening PGs. The project will support the capacity building of producer organizations for climate-smart production and commercialization.

Sub-component 1.2: Promoting smallholder market access

Activities under this subcomponent will focus on improving the commercialization of smallholder farmers through enhanced access to markets, aiming to increase livestock product sales and farmer incomes. To achieve this, the project will finance (i) the establishment/strengthening of business partnerships between smallholder farmers and agribusiness to unleash market opportunities for smallholder livestock producers and (ii) the improvement of common post-harvest infrastructure such as slaughterhouses and market facilities to increase quality, aggregation, processing, and trade of livestock and livestock products of farmers and agribusinesses.

Component 2: Enhanced Animal Production and Health Services

This component seeks to strengthen national and subnational extension and animal health services. Strengthening the core capacities of national and subnational institutions will allow them to deliver effective and consistent extension and animal health services, and to manage animal diseases and zoonoses. By doing so, the activity will increase or preserve livestock herd productivity and farmer incomes by limiting losses from the growing burden of animal diseases and climate hazards thanks to improved climate-smart information and animal health. Ultimately, the activities will enhance the resilience of livestock-based livelihoods. The project will finance (i) demonstration farms to showcase PaTecs, (ii) TA for the development and dissemination of extension information through an information, education, and communication (IEC) approach, (iii) a capacity-building program for national, provincial, and grassroots-level animal health service providers (GDAHP, POAHPs, VAHWs, etc.), and (iv) establishment of an enhanced local disease surveillance system.

Sub-component 2.1: Strengthening Capacity in Animal Production Service Delivery

Activities under this subcomponent will focus on improving farmers' access to extension information and training by enhancing national capacities to deliver and coordinate extension services. The project will finance two main extension approaches to achieve this: (i) field demonstrations and training to equip farmers with practical skills and encourage them to adopt PaTecs most suitable for them, and (ii) IEC, using various actors and media, including information and communication technologies (ICTs), to provide easy access to information and training materials for production and post-production.

Sub-component 2.2: Strengthening animal health service delivery capacity

Under this subcomponent, the project will focus on improving the capacities of national and subnational institutions to deliver animal health services and to perform disease surveillance and management in project locations. The project would finance (i) strengthening capacities of national and local institutions like MAFF, GDAH, POAHs, CAOs, and VAHWs to deliver veterinary services through bolstering the workforce, skills, and incentives for last-mile service providers, and (ii) the strengthening of disease surveillance and response capacities for prevalent TADs and zoonoses in project locations, through an enhanced local surveillance system.

Component 3: Project Management, Monitoring, Evaluation, and Learning

This component will finance operating costs, consultants, and training to carry out fiduciary, environmental, and social safeguards activities and report on the project's implementation progress and results. Particular attention will be paid to monitoring/evaluation and learning. The project will support developing and maintaining a management information system for results tracking and reporting. The project will support establishing a robust monitoring system to track project activities and measure impacts on productivity, value addition, and animal disease and zoonoses. The project will also integrate data collection to track the project's contribution to reducing GHG emission intensities of livestock as part of the monitoring system. The project will implement surveys to ensure systematic assessments of implementation experience and lessons learned. Qualitative assessments will also generate knowledge during implementation to make mid-course corrections. This component will finance mid-term review, final evaluation reports, and underlying analytical work. A consultant will lead the preparation of the mid-term review report in Year 3 of project implementation; an independent institution will carry out the final evaluation report.

1.3 Institutional and implementation arrangements

The project will be implemented over a period of five years. The institutional arrangements for implementation will follow the 'Government Structure', with the MAFF in the lead as the implementing agency (IA), including the GDAH, Forest administration (FA), and other relevant technical line departments at the national level and the PDAA, including the POAHP. The Ministry of Economy and Finance (MEF) will oversee the financial services support. No separate or parallel structures will be created for the project implementation. The MAFF will establish a project implementation team (PIT) which includes experts from relevant technical, administration, procurement, finance, environmental and social standard (ESS), and M&E units of MAFF, grassroots-level animal health service providers GDAH, and FA and other related MAFF's line departments, including where relevant for marketing, the Department of Agro-Industry (DAI). Strategic direction and guidance for the management and operation of the project will be provided by a high-level Project Steering Committee chaired by the MAFF. The PIT will coordinate support for day-to-day planning and implementation. The MAFF will draw on the technical expertise and advice of MAFF and other relevant ministries, e.g., the MoE and MoH, to implement zoonotic-related activities. Where and when necessary, the teams will be supported by consultants and/or contract staff. Last-mile services will be provided to farmers largely through PGs, by CAOs and VAHWs. Private sector players will be the primary providers of inputs, technologies, and supplies. Roles, responsibilities, and procedures are detailed in the PIM.

1.4 Purpose of the Labor Management Procedures

As per the World Bank (WB) Environmental and Social Standard Two (ESS2), Labor and Working Conditions, borrowers are required to develop and implement a Labor Management Procedure (LMP). The LMP should outline procedures to ensure that all project workers, regardless of their category, are managed in compliance with key regulatory provisions such as 1997 Cambodian labor law, ILO conventions applicable to Cambodia, and ESS2. The LMP must safeguard fundamental workers' rights, prevent forced labor and child labor, promote fair treatment and non-discrimination, and establish a safety culture throughout the project.

This LMP is prepared in accordance with the ESS2 of the WB's Environmental and Social Framework (ESF). The LMP is also in line with relevant laws and regulations of the RGC. The main purpose is to identify risks and potential impacts associated with the engagement, use, and management of labor to be engaged under the Cambodia Inclusive Livestock Value Chains Project (CILVCP). Based on identified risks and potential impacts, mitigation measures, including grievance redress mechanism, and implementation arrangements, are proposed. The LMP is a living document and is subject to update when needed during project implementation.

2. ESS2 AND LEGAL REQUIREMENTS

1.1 Requirements of ESS2

The requirements of ESS2 cover the following areas: (a) working conditions and management of worker relationships; (b) protecting the workforce; (c) workers' access to a grievance mechanism; and (d) Occupational Health and Safety (OHS).

Working conditions and management of worker relationships includes requirements that:

- Project workers are provided with clear **terms and conditions of employment**, consistent with national legal requirements;
- The principles of **nondiscrimination and equal opportunity** are applied to project workers, and vulnerable project workers are protected;
- The rights of workers to form workers organizations, consistent with national law, are respected.

Protecting the work force requirements include:

- Provisions to prevent employment of children below the age of 14 or the national legal minimum, whichever is higher, and restrictions on employment of children under 18;
- Prevention of forced labor, including debt bondage.

Direct and contracted workers must have access to a **grievance mechanism**:

The grievance mechanism for contracted workers must be provided by the direct employer and is separate from the project grievance mechanism. Workers will be informed of the grievance mechanism at the time of recruitment and measures put in place to protect them against any reprisal for its use.

OHS requirements must address:

- a. Identification of potential hazards to project workers, particularly those that may be life threatening;
- b. Provision of preventative and protective measures, including modification, substitution or elimination of hazardous conditions or substances;
- c. Training of project workers and maintenance of training records;
- d. Documentation and reporting of occupational accidents, diseases and incidents;
- e. Emergency prevention preparedness and response arrangements to emergency situations; and
- f. Protocols in place to prevent or respond to adverse impacts such as occupational injuries, deaths, disabilities, and disease.

1.2 National Labor and Employment Laws

The framework of law and regulation on labor and employment in Cambodia includes:

- Labor law of 1997; which includes provisions on non-discrimination; prohibition of forced labor including debt bondage; regulation of working conditions; restrictions on employment of minors (under 18 years old); maternity leave; special provisions for employment of agricultural workers; health and safety; trade union rights;
- International Labor Organization (ILO) conventions No. 138, Minimum Age; and No. 182, Worst Forms of Child Labor, have been ratified by the RGC;
- Ministry of Social Affairs, Veterans and Youth Rehabilitation (MoSAVY) Prakas (proclamation) No. 106 on the Prohibition of Children Working in Hazardous Places (28 April 2004).

The minimum age for employment under the Labor Law of 1997 is 15, with restrictions applied to employment of children aged under 18 (Article 177).

Chapter XI of the labor law guarantees workers' rights to form unions. The Labor Law includes provisions against discrimination for union membership and to regulate collective negotiation of pay and conditions.

The Labor Law (Article 107) provides for a guaranteed minimum wage, which is set by secondary legislation. To date, however, the minimum wage has been applied consistently only in the garment industry and is now being gradually extended to and considered for other sectors.

The Labor Law is a comprehensive document that meets many of the requirements of ESS2. A gap analysis matrix indicating correspondence between key ESS2 requirements, and the Labor Law is presented as Annex 1. The identified gaps are:

- Labor Law requirements on worker's rights to clear terms and conditions of employment are restricted to enterprises with 8 or more workers, which is not consistent with ESS2;
- Labor Law permits light work for children under the mandatory minimum employment age (15) in certain circumstances: this is not consistent with ESS2;
- Labor Law also provides that exceptions can be granted to restrictions on hazardous work by children aged 15-18; this is not consistent with ESS2.
- Further, prohibitions on child labor are applied only in formal employment contexts, while most child workers are in non-formal employment, to which ESS2 applies;
- Labor Law does not clearly specify that workers must have access to a grievance mechanism, which is required by ESS2;
- Labor Law does not include clear requirements for reporting of occupational health and safety incidents, as required by ESS2.

However, it should be noted that common employment practice in Cambodia frequently varies from the provisions of the Labor Law, which are not widely known or understood outside certain sectors such as the garment industry. Annex 1 identifies gaps between common practice and ESS2 requirements, including:

- Less formal enterprises may not be aware of rules relating to terms and conditions of employment. It is unlikely that employment cards (required by law) could be obtained for any type of temporary worker;
- No clear enforcement mechanism for rules on non-discrimination and equal opportunity. Quotas for employment of people with disabilities set by 2010 Sub-Decree (as required by the Law on protection and promotion of the rights of disable persons) are poorly enforced in practice.
- Although the law guarantees workers' rights to unionize, labor unions are prominent in garment industry but not common in other sectors;
- Employment of children working alongside their parents in agricultural labor is a well-known occurrence. Ongoing allegations suggest that this practice is also prevalent in brick kilns, often accompanied by debt bondage and hazardous working conditions;
- Debt bondage is known to occur;
- Enforcement of safety standards is weak, especially in informal sectors and in the construction industry;
- Despite employers' legal liability for workplace accidents, only 11% of construction/renovation workers insured (Phnom Penh Post 09/01/2020).

Therefore, project measures will need to address the discrepancies between Labor Law and ESS2, while incorporating measures to ensure compliance with Labor Law requirements whenever they align with ESS2. Moreover, in cases where gaps exist between the national Labor Law and ESS2, the stricter provisions will take precedence. Annex 1 provides an overview of these project measures, which will be further elaborated upon in Sections 4 and 5 below.

1.3 Labor and Working Conditions Inspection

The Labor Law establishes a labor inspection function under Ministry of Labor and Vocational Training (MoLVT). The mission of the Labor Inspection is (Article 334):

- To ensure enforcement of the present Labor Law and regulatory texts that are provided for, as well as other laws and regulations that are not yet codified and that relate to the labor system;
- To provide information and technical advice to employers and to workers on the effective ways of observing the legal provisions;
- To bring to the attention of the competent authority any improprieties or abuses that are not specifically covered by the existing legal provisions;
- To give advice on issues relating to the arrangement or restructuring of enterprises and organisms that have been authorized by the administrative authorities and covered by Article 1 of the law;
- To monitor the enforcement of the legal provisions regarding the living conditions of workers and their families.

The Labor Law also makes "Labor Inspectors and Labor Controllers" responsible for inspection and enforcement of legislative provisions and regulations regarding health, working conditions and safety (Article 233).

Information on the current functioning of the labor inspection system is available from ILO¹. MoLVT has separate departments for Labor Inspection and for OHS. At sub-national level, labor inspectors assume all the labor inspection functions without distinction, both OHS and working conditions. There appears to be no guidance from the central authority regarding the planning and programming of inspection activities, leaving provinces to decide independently on their own inspection priorities and actions.

1.4 Labor and Working Conditions in Standard Contracting Frameworks

The RGC's Procurement Manual for All Externally Financed Projects in Cambodia governs the procurement of works and services at the national level in donor-funded projects and will be applied in the Cambodia Inclusive Livestock Value Chains Project. The General Conditions of Contract (GCC) for works include the provisions that:

- The Contractor shall be responsible for the safety of all activities on the Site (Clause9);
- Throughout the duration of the contract, the Contractor and their subcontractors must consistently comply with all labor laws, including legislations pertaining to child labor, and other pertinent regulations (Clause 13).

For small works contracted through local administrations, the procurement framework of the Commune-Sangkat Fund Project Implementation Manual (C/SF PIM) 2019 is applied. The contract conditions of this document do not specify provisions for labor and working conditions. But general provisions of Cambodian law are presumed to apply. National Committee for Sub-National Democratic Development – Secretariat (NCDD-S) is revising its policy on environmental and social safeguards, including labor and working conditions, which has similar requirements to ESS2. However, until this revision is finalized, ESS2 requirements will be applied to fill in the gaps and it cannot be assumed that the revised edition of its policy will adequately comply with ESS2 requirements.

3. OVERVIEW OF LABOR USE AND WORKING CONDITIONS PROCEDURES

3.1. Types of Project Worker and Applicability

The LMP will apply to staff other than civil servants who are employed directly by the project at project offices; employees of contractors and service providers; and project beneficiaries engaged in community works. Employees of direct suppliers to the project are considered as primary supply workers and are covered by provisions of the LMP relating to prevention of child labor, forced labor and serious safety issues.

Members of beneficiary households engaged in household livelihoods activities are not considered as project workers. However, insofar as the household livelihood activities are planned, enabled, or facilitated through the project, GDAHP and partner agencies will endeavor to ensure that relevant protections, particularly occupational health and safety and restriction of child labor, are extended to these activities.

Direct project workers refer to people employed or engaged directly by GDAHP (including the project proponent and the project implementing agencies to work specifically in relation to the project). This will include CILVCP Project workers/staff, finance and administration, national E&S supervision consultants, other consultants as needed.

¹ https://www.ilo.org/labadmin/info/WCMS_209354/lang--en/index.htm

Contracted workers (people employed or engaged by third parties to perform work related to core functions of the project) will include employees of construction/renovation contractors and service providers, and suppliers of goods in some circumstances (e.g., if the supply contract includes installation at a project site). To the extent possible, the project CILVCP will hire local workers, both skilled and unskilled workers for the construction/renovation of slaughterhouses and market facilities.

Primary supply workers are people employed or engaged by suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project. Importantly, workers of suppliers to construction/renovation contractors may be considered as falling within this category. This category includes workers in sectors where the Environmental and Social Management Framework (ESMF) has identified concerns about OHS standards, use of child labor and forced labor including commercial agriculture establishments supplying feed materials to the project, and workers producing construction/renovation materials including sand, gravel, bricks and tiles.

Community members and project beneficiaries engaged in community labor, for example, Village Animal Health Workers (VAHW) and Commune Agriculture Officer (CAOs), whether paid or unpaid, are considered as **community workers**. ESS2 provisions are to be applied to community workers, providing labor on a voluntary basis, proportionately with (a) the nature and scope of the project; (b) the specific project activities in which the community workers are engaged; and (c) the nature of the potential risks and impacts to the community workers.

The below table provides a breakdown of categories, approximate numbers and scheduling of project workers and types of work.

Table 1: Schedule of Project Workers By Category

Type of Worker	Base location (PP or Province)	Estimated Number	Length of work (full time, short-term, intermittent, etc)	Types of Work (office, field visits/works, survey, design, etc)
Direct Project Workers				
CILVCP Project workers/staff	Phnom Penh	10	Full project period	Office work, some field visits
Finance and Administration	Phnom Penh	02	Full project period	Office work, some field visits
E&S supervision consultants	Phnom Penh	02	Intermittent	Office work, some field visits
Other consultants as needed	Phnom Penh	01	Intermittent	Office work, some field visits
Contracted Workers				
Professional / Supervising Engineers/ supervisory staff of works contractors for renovation/construction/rehabilitation of slaughterhouses and market facilities.	Battambang, Tboung Khmum, and Kampong Speu	02	Short-term	Work at construction site
Skilled and semi-skilled construction worker staff of works contractors for renovation/construction/rehabilitation of slaughterhouses and market facilities.	Battambang, Tboung Khmum, and Kampong Speu	05	Short-term	Work at construction site
Unskilled construction labor hired from the community for renovation/construction/rehabilitation of slaughterhouses and market facilities.	Battambang, Tboung Khmum, and Kampong Speu	10-15	Short-term	Work at construction site
Primary Supply Workers				
Employees of direct suppliers of construction/renovation materials provided to works contractors for construction/renovation slaughterhouses and market facilities.	Battambang, Tboung Khmum, and Kampong Speu	2-3 per construction site	Intermittent	Construction/renovation materials supply Manufacture of bricks and tiles Quarry work (crushed rock, gravel, sand)
Community Workers				
Village Animal Health Workers and Commune Agriculture Officer (CAOs)	Battambang, Tboung Khmum, and Kampong Speu	10-20 people per province	Ongoing, intermittent	Support Animal Health services in community under project area

4. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

4.1. Scope of Project Activities

Activities carried out by project workers in the Cambodia Inclusive Livestock Value Chains Project could include:

- Project administration and technical tasks carried out in project offices based in GDAHP in Phnom Penh and target provinces: Battambang, Tboung Khmum, and Kampong Speu (direct project workers and contracted workers in professional categories);
- Construction/renovation of slaughterhouses and market facilities mainly carried out by contracted workers including supervisory, technical, semi-skilled and non-skilled workers of construction contractors, and supervising engineers who will be professional staff of service providers.
- Supporting Animal Health Services in the Community under the Project Area, through activities such as meetings, training sessions, and home visits.

4.2. Occupational Health and Safety

Contractors will be required to adopt and implement these LMPs as part of Environmental and Social Code of Practice (ESCP), including procedures to establish and maintain a safe working environment as per requirements of ESS2.

Travel to and work at project sites, which can be in remote areas, may expose direct project workers to OHS risks. These risks include (a) risk of road traffic accidents (RTA), particularly for workers travelling by motorcycle; (b) security risks including robbery; (c) risk of water-borne or vector-transmitted diseases including malaria and dengue; (d) risk of snakebite and insect stings; and (e) risk of unexploded ordinance (UXO) at project sites. All project sites will be subject to a site-specific OHS risk assessment and management plans, which will be described, with mitigation measures, in an ESCOP.

Common labor management practice for management of manual works, particularly in the construction industry, may result in exposure of workers to risks including (a) unclear or nonspecific terms and conditions of employment; (b) potential discrimination against women or members of other groups; (c) denial of workers' rights to organize; and (d) no access to a grievance redress mechanism. The ESHS specification will clearly state required standards in respect of each of these and compliance will be monitored as part of construction/renovation supervision.

Contracted manual workers, particularly in construction/renovation works, are likely to be exposed to significant occupational health and safety risks which may not be adequately mitigated by common practices in the Cambodian construction industry. Risks are likely to include:

- Risks of workplace accidents, particularly when operating construction/renovation equipment, when working at height on building construction/renovation, and when handling heavy equipment and materials;
- Risks from exposure to hazardous substances (dust, cement, chemicals used in construction/renovation etc.) and substandard products and equipment;
- Risks associated with living conditions in site camps, which may include inadequate provision of (potable) water, sanitation, and emergency first aid kits as well as the risk that construction camps become locations for transmission of sexually transmitted diseases or expose workers

to vector-transmitted diseases such as malaria and dengue and to risk of snakebites and insect stings;

- Potentially, risks from encountering unexploded ordinance during construction/renovation works.

Potential health and safety hazards to community workers will depend on the types of tasks undertaken. Potential risks could include:

- Risks arising if construction/renovation works, particularly construction/renovation of buildings and structures or deep excavations, are implemented through community works;
- Risks associated with the location, which could include risks of encountering venomous snakes and insects, and potentially UXO;
- For volunteers and facilitators who are not contracted and paid by the project or implementing partners, and who may be considered as community workers in this context, the same risks associated with travel as apply to direct project workers.
- Community workers expose to zoonotic diseases from inappropriate waste disposal and management (incl. slaughterhouses/markets), sample transportation and management, and injuries from sharps (syringes, needles, blades etc.) disposed by vaccination programs, health and safety issues related to the handling, transportation and disposal of carcass and other biological materials.

4.3. Fair Treatment and Nondiscrimination

Risks of unfair or discriminatory hiring practices could occur in hiring of direct project workers and in hiring of workers by contractors and primary suppliers. Engagement of community workers could also involve unfair or discriminatory elements, particularly where community work is rewarded with payments in cash or in kind or with other benefits.

4.4. Forced Labor and Restriction of Child Labor

Forced labor is forbidden under the Labor Law (Article 15, Section 5). Forced labor includes situations where persons are coerced to work through use of violence or intimidation, manipulation of debt, retention of identity papers, threats, or other forms of retaliation. Hiring of people to work to pay off their debt is considered forced labor.

Risk remains that child labor could occur, and the project will require measures to avoid this risk. Use of child labor, usually accompanied by parents, and debt bondage labor, often in dangerous conditions, has been documented at brick kilns in Cambodia. Bricks and tiles for building construction/renovation are likely to be sourced from local producers. There is also a risk of children working alongside their parents as laborers in commercial farms or factories. The project may source the materials, including those used in agriculture and construction/renovation, from suppliers that exploit child labor or engage in practices such as debt bondage labor.

4.5. Workers Grievances

Cambodia's Labor Law does not require that employers institute a formal grievance mechanism for employees, and it is unlikely that private sector contractors to the project will have a formal, pre-existing system or be aware of how to establish such a system. Therefore, project workers who encounter a workplace issue or wish to pursue a grievance may find they have no avenue to do so, or that they face retaliatory sanctions for doing so.

4.6. Unpaid Overtime Work

Working overtime may be required to catch up with delay construction/renovation progress, or to complete certain part of the construction/renovation before the wet season starts. It is also common that Contractors, including subcontractors, may fail to keep record of their workers' overtime work hours. As a result, overtime compensation is not paid, and workers are not aware of their entitlement to overtime payment and do not claim accordingly. When workers are required to work overtime for urgent jobs, the overtime hours shall be paid at the additional 50% of rate for normal hours. If the overtime hours are worked at night or during weekly time off, the rate of increase shall be 100% – as per Article 139 of the Law of Labor.

4.7. Potential for Accidents and Emergencies

In addition to RTA and work-related accidents as discussed above, areas of the target provinces can be subject to periodic flooding. In limited areas, this may include flash flooding and sudden flooding associated with release of water from upstream dams. Forest fires occur in the target provinces but do not seem to constitute a major threat to safety: climate change could make this risk more severe. Windstorms and lightning strikes are also potential hazards in the target areas.

4.8. Gender Based Violence

Gender Based Violence (GBV) is a known risk in Cambodia, particularly in rural areas, and is often intra-household or intra-community in nature. GBV risks related to management of project workers might include:

- Potential risks to women project workers travelling in remote areas (management of this risk should not result in any discouragement of employment of women in relevant capacities); and
- Potential risks of GBV committed by contractors' workers, including those temporarily resident in site camps for construction/renovation works.

5. POLICIES, PROCEDURES AND RISK MITIGATION MEASURES

Based on the gaps assessment, it has been determined that several policies and requirements are necessary to effectively manage labor and working conditions risks at the sub-project level. These policies and requirements include (1) Labor Management Procedure; (2) Contractor Occupational Health and Safety (OHS); (3) Direct and Contracted Workers; (4) Primary Supply Workers; (5) Age of Employment and Age Verification.

5.1. Labor Management Procedures

GDAH will adopt and have overall responsibility to ensure compliance with the following instruments and measures, which ideally should be part of this LMP:

- Child Labor and Forced Labor Procedures
- OHS Strategy for Direct Project Workers
- Terms and Conditions for Employment of Direct Project Workers
- OHS of contracted workers.
- Community Labor Management Procedure;

- Workers' Grievance Redress Mechanism.

If necessary and applicable, GDAHP may develop a Community Labor Management Procedure as a standalone document.

5.2. Occupational Health and Safety (OHS) Risks

Occupational health and safety is a particular high risk for workers involved in civil works. In Cambodia, workers of the construction contractors or sub-contractors are normally either not fully provided with personal protective equipment (PPE) or are not fully trained for occupational health and safety, particularly for job-specific risks such as working at height, hot work, rigging, electrical work, confined space work and working with heavy equipment. Lack of first aid equipment, trained personnel and emergency arrangements and procedures are normally observed at the construction sites.

Works contractors will be required to prepare a site-specific OHS plan for site works. The plan may include (a) assessment of risks including work accidents, hazardous substances, risks associated with the location; risks related to site camps etc.; (b) measures to ensure safe working around construction machinery; (c) measures to ensure safe working at heights; (d) measures to ensure safe handling of hazardous materials; (e) personal protection equipment to be provided, including type and number; and (f) training of project workers and maintenance of records; (g) documentation and reporting of occupational accidents/incidences and diseases; (h) first aid provisions on site; and (i) accident and emergency procedures, including location of relevant health facilities; (j) remedies for adverse impact such as occupational injuries, death, disability and disease. Engineering supervisors will work with works contractors to prepare and finalize these OHS plans.

5.3. Direct Project Workers

GDAHP will establish an occupational health and safety (OHS) strategy for all direct project workers. The strategy will identify potential health and safety hazards associated with project work, particularly including risks of travel to remote sites. Project direct workers will be consulted for their inputs and health and safety concerns. The OHS strategy will identify appropriate mitigation measures. Environmental and social unit (ESU) will be nominated as OHS Focal Point and will manage the OHS strategy and to update it as needed. The OHS strategy will include a reporting system with a register of health and safety incidents (accidents and other incidents affecting workers' health and safety) which will be centrally maintained by the OHS focal point.

OHS strategy will include specific measures to ensure the safety of workers travelling to remote sites, including (1) project cars to be driven by professional drivers only; (2) compulsory helmet use for drivers and passengers on project motorcycles at all times, and on private motorcycles when used for project-related tasks; (3) travel by motorcycle for project-related purposes to be in daylight hours only; and (4) measures to monitor, anticipate and avoid potential security risks while travelling, including liaison with local police and authorities and encouraging project workers to share any concerns they may have.

Project workers in remote areas will receive health and safety training including prevention of infection through contaminated food and / or water and or through vector-borne diseases and avoidance of snakebites and insect stings. Site-specific risks will be assessed as part of the ESCOP which will include plans for emergency evacuation and identification of emergency health facilities. If necessary, stocks of snakebite antivenom will be maintained at project sites, or availability otherwise ensured.

UXO risks will be assessed for all sites with the assistance of Cambodia Mines Action Centre / Cambodia Mines Action Authority and appropriate risk mitigation measures adopted.

Terms and Conditions for Employment of Direct Project Workers will require that all project and project partner agencies adopt and monitor a nondiscriminatory hiring policy. Implementation will be monitored by GDAHP, with all partner agencies required to report.

The Terms and Conditions for Employment of Direct Project Workers will reaffirm the rights of all project workers under the Labor Law, including the right to organize.

5.4. Contracted Workers

The ESHS specifications will be included in contract documentation for all contracts under which contracted workers will be employed. Compliance with the ESHS Specifications will be mandatory. Their compliance will be verified by the supervising official or engineer, as part of the payment approval process. The ESHS Specifications will include the following provisions:

- Ensuring full compliance with Cambodian law, at a minimum, to ensure the workplace health and safety standards. This include: (1) Mandatory basic safety awareness training for all individuals before being allowed to enter an active construction site; (2) All vehicle drivers must possess appropriate licenses, and construction equipment operators must receive training in safety procedures; (3) Safe management of the area surrounding operating equipment, such as the turning circle of excavators, with the deployment of flag-persons when necessary; (4) Mandatory provision of hard helmets, safety boots, and protective gloves for all workers on construction sites; (5) Secure scaffolding and fixed ladders to be provided for work conducted above ground level; (6) Provision of first aid equipment and facilities in accordance with the Labor Law; (7) Presence of at least one supervisor, trained in safety procedures, on-site at all times during construction/renovation work; and (8) Adequate provision of hygiene facilities and resting areas for workers, among other amenities
- All workplace health and safety incidents must be properly recorded in a register which will be shared with the supervising engineer. The format for this register will be provided with the ESHS and will include (1) time and place of incident; (2) type of incident; (3) type of injury or other impact occurring, and number of workers affected; and (4) actions taken (first aid, evacuation etc.).
- All work sites must have a health and safety plan that includes the identification of potential hazards and outlines the necessary actions to be taken in case of an emergency. This plan should also specify the location of accident and emergency facilities for immediate response and assistance;
- Any on-site accommodation must meet safety and hygiene standards, including provision of an adequate supply of potable water, washing facilities, sanitation, accommodation, and cooking facilities. The location and layout of site camps should be agreed upon with construction supervisors and a risk assessment conducted. The EBRD / IFC Guidance Note on Workers' Accommodation: Processes and Standards² should be used as a reference for determining acceptable quality of on-site accommodation for contracted workers;

² International Finance Corporation (IFC) and European Bank for Reconstruction and Development (EBRD) 2009: Workers' Accommodation: Processes and Standards.

- Workers residing at site accommodation should receive training in preventing infection caused by contaminated food and / or water and or through vector-borne diseases, and sexually transmitted diseases. The training should focus on raising awareness and providing guidance on how to avoid these health risks.
- Fair and non-discriminatory employment practices must be followed. When contractors hire workers from the beneficiary community, equal access to opportunities should be provided to disadvantaged and vulnerable community members. In cases where a significant number of community members are employed, childcare facilities should be provided to support the workers.
- Procurement of construction/renovation materials manufactured in Cambodia should only be done from suppliers who can provide certification, supported by Ministry of Labor inspection, ensuring that no forced labor (including debt bondage labor) or child labor (except as permitted by the Labor Law) has been utilized in the production of those materials;
- All employees must be informed of their rights under the Labor Law, including the right to organize; and additionally, all employees should be made aware of their rights to submit a grievance through the Project Worker Grievance Mechanism.

Monitoring compliance with the ESHS Specifications, including the LMP requirements, will be an essential aspect of contract supervision. The responsibility for this supervision lies with the supervising engineer (for works contracts) or the supervising project official, who may be a staff member of GDAHP or partner agencies. It is a prerequisite for payment release that certification is provided, verifying compliance with these conditions.

If any breach of these conditions is identified, the supervisor will issue a written notice, instructing the implementation of corrective actions. In cases where there is a serious and immediate risk to health and safety in the construction/renovation works, all activities on the site will be halted until the necessary corrective actions are taken. For less urgent situations, if the corrective action has not been taken within 7 days, work on the site will be suspended.

When project beneficiary communities are engaged as contracted workers, the responsible GDAHP in collaboration with the Commune Council and community leaders will implement additional measures to ensure that vulnerable and disadvantaged members of the community have equal opportunities to benefit from the project. The implementation of these measures will be carried out by the Commune Councils and community leaders, with support from GDAHP.

To monitor and report on the employment of workers from the project beneficiary communities, E&S officials or consultants should be appointed. The reporting will include detailed information on age groups, gender, ethnicity, and employment of individuals with disabilities. Contractors who hire a significant number of workers from the community will be required to provide childcare services, which may involve hiring community members specifically for this purpose. This provision aims to ensure that women with childcare responsibilities are not excluded from employment opportunities.

5.5. Primary Supply Workers

GDAH must ensure that primary supply workers are employed under conditions that comply with ESS2 and Cambodian labor law on employment of children and the prohibition of forced labor, including debt bondage. Compliance with these legal provisions is an essential requirement for any contract or sub-contract within the project's scope of activities.

The contractor is required to include compliance with the obligations outlined above for primary supply workers employed by suppliers to construction contractors. In cases where there is a known risk, such as with bricks and tiles produced at Cambodian kilns, the contractor will be required to verify compliance either through direct inspection or by obtaining a certificate of compliance from Ministry of Labor inspectors.

GDAH or implementing partners will be responsible to ensure compliance of suppliers from whom they purchase directly. In the known risk case of suppliers of agriculture planting materials, verification will be either by direct inspection or by obtaining a certificate of compliance from Ministry of Labor inspectors.

5.6. Community Workers

As required by ESS2, all GDAH and project partner agencies initiating community work tasks must ensure that community work labor is provided voluntarily based on an individual's clear agreement within the community. The agreement may include justifications for the need of voluntary services and any provision of allowance. These agencies will apply the relevant provisions of ESS2 in a manner that considers and is proportionate to (a) the project's nature and scope; (b) the specific project activities involving the community workers; and (c) the potential risks and impacts to the community workers.

The community work labor should not be voluntary and should be properly paid if the tasks require full-time work and involve hazardous work.

GDAH will develop and adopt a Community Labor Management Procedure that will incorporate the following provisions:

- Establish terms and conditions, including the amount and method of payment, for each category of community workers;
- Establish a procedure for conducting a health and safety risk assessment to identify potential OHS risks associated with the proposed tasks. Prepare an OHS risk management plan specific to the task, outlining relevant avoidance and mitigation measures. This may include: (1) providing workplace safety equipment; (2) Ensuring the availability of workplace first aid facilities; (3) prohibiting community members from engaging in hazardous tasks, such as operating vehicles and equipment, without appropriate training; and (4) ensuring that a trained supervisor is present whenever a potentially hazardous task is being undertaken;
- For every community work task, establish protocols to be followed in case of an emergency. These protocols should include arrangements for transporting any injured individuals to an accident and emergency facility promptly;
- For every community work tasks, designate a focal point or community development coordinator responsible for ensuring health and safety throughout the community task. This

individual will receive appropriate training and be responsible for a record of any health and safety related incidents that occur;

- Prohibit potentially dangerous construction/renovation activities, including (1) operating any type of ride-on construction/renovation equipment; (2) engaging in construction/renovation work at heights above ground level; (3) conducting construction/renovation work in excavations deeper than shoulder depth; (4) handling hazardous materials (cement is acceptable);
- Prohibit the involvement of children under the age of 15 in any community work tasks.
- Children aged 15-17 will not be employed or engaged in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral, or social development.

5.7. Age of Employment and Age Verification

As per Cambodian law, the minimum age for employment for any category of project worker is 15 years old. Children under the age of 18 will not be employed as direct project workers under any circumstances.

Children aged 15-17 will not be employed or engaged in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral, or social development. Subject to this general requirement, children aged 15-17 will only be employed as contracted workers under the following conditions:

- The identity, age and proposed role of the child worker will be notified to the supervising official or engineer in advance;
- An appropriate risk assessment is conducted prior to the work commencing;
- Children aged 15-17 will not work unsupervised at any time;
- Children aged 15-17 will not be employed in any capacity in construction/renovation of buildings and structures, or any capacity that requires entering excavations more than shoulder-deep;
- Children aged 15-17 not to be employed in any capacity that requires handling of potentially hazardous construction/renovation materials, including cement;
- Children aged 15-17 enrolled in school are not to be employed during school hours; and
- GDAHP conducts regular monitoring of health, working conditions, hours of work, and other requirement of ESS2.

Direct suppliers of materials to the project will be required to comply with Cambodian law regarding employment of child labor, in production, handling and transport of any materials supplied to the project or to its contractors.

Children aged below 15 years may not participate in community work tasks. Restrictions on community work by children aged 15-17 are listed in paragraph above.

GDAHP and project partner agencies will be responsible to verify and monitor the age of project direct workers before the start of employment. Normally this will be done through a check of valid national ID card or a birth certificate.

Contractors will be responsible to verify and monitor the age of contracted workers. Supervising officials and engineers may request proof of age of any worker suspected to be under 15, or under 18 and carrying out a task not permitted for this age group.

All direct suppliers to the project must be notified that compliance with Labor Law provisions concerning child labor and World Bank's requirements outlined in ESS2 are mandatory contractual obligations. Additional verification must also be undertaken for the following known high-risk sectors;

- Commercial agriculture plantations in Cambodia, supplying planting materials to the project;
- Kilns manufacturing bricks and tiles for supply to the project.

Age verification may be undertaken by either:

- Direct inspection of the premises of the suppliers, with the presence of ESU; or
- Provision of a certificate issued by the Ministry of Labor / Provincial Department of Labor, certifying that the premises of the suppliers has been inspected and no breaches of Cambodian law on child labor or forced labor have been found.

If a project implementing partner intentionally breaches the minimum age of employment provisions or fails to conduct mandatory checks, the partnership agreement will be canceled. Similarly, if a contractor intentionally breaches these provisions or fails to carry out mandatory checks, the contract will be terminated.

If it is determined that a breach has occurred despite the contractor, supplier, or partner agency conducting mandatory checks in good faith (for example, if the worker submitted false evidence of age), the contract or partnership agreement will be suspended until full and effective compliance with prohibitions on child labor and forced labor is verified. Furthermore, payment for any portion of goods supplied, completed works, or services obtained using child labor or forced labor will be withheld.

The verification of compliance with child labor restrictions by suppliers in high-risk sectors (as mentioned above) must be completed before supplies are delivered to the site or payment is made. In the case of construction/renovation works by contractors, no payment will be issued for any part of the works constructed using bricks or tiles unless the supplier's compliance with child labor restrictions has been verified.

Any case of breach of child labor and forced labor restrictions are deemed a severe incident and must be notified to the World Bank Task Team Leader within 48 hours. The World Bank will have the right to review the adequacy of any sanctions applied.

6. WORKER GRIEVANCE MECHANISM

All project workers should be provided with access to a workplace grievance mechanism established by GDAHP or contractors to address workplace concerns. The contractors will be required to implement a Worker Grievance Redress Mechanism (WGRM). The GDAHP focal points (i.e ESU) will review records monthly. GDAHP will keep abreast of GRM complaints, resolutions and reflect in quarterly reports to the World Bank.

GDAHP will establish a worker grievance redress mechanism (WGRM) that will be easily accessible to project direct workers and contracted workers. The WGRM is separate from the project GRM described in the Stakeholder Engagement Plan (SEP).

The purpose of the WGRM is to address workplace concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution. The WGRM will operate in an independent and objective manner.

All project direct workers and contracted workers will be informed of their right to access the WGRM and contact details for the relevant focal point to whom grievances should be addressed in the first instance.

Project partner agencies and contractors may establish their own worker grievance redress mechanism and may advise workers to address grievances to this internal mechanism in the first instance but must make workers aware of their right to access the WGRM.

GDAHP will appoint Focal Points for the WGRM. Contact details for the Focal Point will be disseminated to workers. The options available to workers for submitting grievances to the Focal Point should include the following:

- The location of regular duty station office where the Focal Point can be met in person or where mail can be delivered;
- A dedicated telephone number provided by the project for grievance submissions, along with the specified hours of availability; and
- A social media account dedicated to receiving grievances, ensuring submissions remain confidential and are not visible to other users.

Core Steps of the WGM

Clear guidelines should be established for documenting complaints and concerns, including defined timeframes for resolving issues. The Grievance Mechanism should encompass the following key steps and principles, spanning from the initial receipt of the grievance to its closure and record-keeping:

- **Grievance Filing and Receipt:** The grievance/complaint process should offer multiple channels for workers to file their concerns, including verbal face-to-face, hotline, email, and written forms. To facilitate effective identification and investigation, workers should be encouraged to provide essential information such as their name, address, and a clear description of the grievance's nature. Anonymous grievances will also be accepted. All grievances will be documented and compiled in the grievance logbook. Acknowledgment of receipt will be provided to workers within a defined period, typically within three to five days.
- **Grievance Screening:** A grievance screening process should be implemented to determine the eligibility of complaints for the grievance mechanism, enabling efficient resource allocation by excluding irrelevant grievances. Complaints that are not related to labor and management conditions or project activities should be redirected to the appropriate parties or suggested to be reported to public authorities. Specific screening criteria should be developed to assess if the grievance falls within the scope of the Project or the Grievance Mechanism, as well as if the complainant has reasonable grounds for filing the grievance. The decision regarding the acceptance or rejection of the grievance should be promptly communicated to the complainant, primarily by the contractor. If the complainant remains unsatisfied, the complaint will be escalated to the construction supervisor and ESU.

A system will be implemented to ensure that efforts are made to inform the possible complainant about the screening decision for any anonymous grievances. This could include using a public notification area accessible to all workers.

- **Assessment of grievance:** Assessment will be undertaken whether the grievance is caused by the workers conditions under the Project. It is generally considered good practice to offer a range of grievance resolution approaches to accommodate cultural and personal preferences. It is noted that any discussion with the complainant should be carried out following two-way communication/consultation principle in a culturally appropriate manners, including the preferred venue and languages. The best effort should be employed to communicate the decision of the grievance assessment outcomes of any anonymous grievances to the possible complainant (such as through public notification area accessible by all workers).
- **Implementation of corrective action:** Once the appropriate corrective action has been decided and agreed, the action should be implemented as soon as possible. In some circumstances, it will be appropriate to follow-up with the complainant for their satisfaction with the resolution or remedial actions.
- **Grievance tracking and monitoring:** Grievances will be tracked and monitored, which will allow for reporting as well as feedback for learning and improvement of the grievance procedure itself. The grievance can be closed out in the grievance log as resolved, unresolved (i.e., complainant did not accept the proposed resolution and has appealed to other entities for resolution) or abandoned (i.e., complainant is no longer contactable and efforts to trace whereabouts have been unsuccessful).

The grievance should be filed and processed at no costs to the complainant. However, if the complaint remains unresolved or the complainant is dissatisfied with the outcome proposed, the grievant may refer the matter to the appropriate legal or judicial authority, at the complainant's own expense. A decision of the Court will be considered as final resolution.

The complainant shall not face any sanctions or retaliatory measures whatsoever because of lodging a complaint. Imposing sanctions or engaging in retaliation or pressuring a contracted worker by a contractor to withdraw their grievance constitute breach of contract.

7 IMPLEMENTATION ARRANGEMENT, MONITORING, EVALUATION AND REPORTING

GDAH will monitor implementation of the LMP and systematically report on activities and outcomes in a dedicated section of the periodic and annual project reports. Supervising Engineers will also monitor the key contractors and suppliers regularly during the period of the investment and contract, through review, assessment, monitoring, and reporting.

The specific key responsibilities are outlined as follows, and they will be subject to updates if necessary.

Engagement and Management of Contractors/Subcontractors. GDAH is responsible for contractor engagement and compliance with contract conditions. The GDAH will address all LMP aspects as part of procurement for works. GDAH will be responsible for overseeing all aspects of implementation of the works, including compliance and contractor induction.

Meanwhile the Contractor is responsible for management of its staff and subcontractors in accordance with the Labor Management Plan.

Labor and Working Conditions. Contractors will keep records. GDAH may at any time require records to ensure that labor conditions are met. GDAH will review records against actuals, at a minimum monthly, and can require immediate remedial actions if warranted. A summary of issues and remedial actions will be included in quarterly reports to the World Bank.

Training of Workers. Contractors are required to, always, have a qualified safety officer on board. If training is required, this will be the contractor's responsibility. The safety officer will provide instructions to contractor staff. The contractor will be obligated to make staff available for any mandatory trainings required by GDAHP, as specified by the contract.

Addressing Worker Grievances. The Contractors will be required to implement a Grievance Redress Mechanism (GRM) for workers. The GDAHP's ESU will review records monthly. GDAHP will keep abreast of GRM complaints, resolutions and reflect in quarterly reports to the World Bank.

Occupational, Health and Safety. Contractors must designate a minimum of one safety representative to ensure day-to-day compliance with specified safety measures and records of any incidents. Minor incidents and near misses should be reported to GDAHP monthly; serious incidents should be reported immediately. Minor incidents should be reflected in the quarterly reports to the World Bank, and major issues should be flagged to the World Bank immediately.

Labor management reports, incorporating those of key contractors/suppliers under the direct contracting management responsibilities will apply as well. The reports are to measure the implementation of their labor management and to assess their performance against this LMP on a regular basis.

Reporting may include the following:

- Awareness raising materials produced and trainings undertaken;
- Outcomes of recruitment of direct project workers by age, gender and ethnicity;
- Records of the project direct worker grievance mechanism;
- Recording of occupational health and safety incidents. These must be systematically recorded and reported through the responsible GDAHP in a standard format including (1) type of incident; (2) severity class of incident (major, moderate, minor); incident classification (e.g. fatality, illness, medical treatment), and notification timeframe (e.g. Immediately, within 72 hours, etc.).
- Cases of serious breaches of contractors' obligations under the LMP, and remedial actions taken.

The effectiveness of implementation of the LMP will be evaluated by an independent evaluator as part of the ESS Audit described in the ESMF and ESCP. This evaluation will include confidential interviews with project workers in all categories to determine their awareness of their workplace rights and their experience of working conditions under the project.

8 CAPACITY BUILDING

The provisions outlined in these LMP are in most respects consistent with the requirements of the Labor Law 1997, with only limited additional provisions (for example, the Worker Grievance Redress Mechanism) to meet the requirements of ESS2.

However, the provisions of this LMP exceed the current practices in labor management in Cambodia, particularly within the country's construction industry. It should be anticipated that labor managers in project, project partner agencies, contractors and suppliers, and particularly local construction contractors might find it challenging to meet these LMP's requirements. To address this issue, the project will develop and deliver trainings and simple awareness raising materials.

Key project personnel who may require training include:

- Human resources staff or administration staff responsible for recruitment of direct project workers;
- Procurement staff;
- E&S Risk Management Focal Points GDAHP, and ESU;
- Management Focal Points in each project partner agency;
- Staff, consultants, and consultants' staff acting as contract supervisors and responsible for monitoring compliance with the policy.

Capacity building and awareness activities should be covered under the proposed budget in the umbrella instrument, ESMF. GDAHP (ESU) will develop and deliver a short training course for contractors and / or contractors site managers, explaining the obligations of the contractor as set out in the ESHS Specifications. Supervising engineers are also to attend these courses.

GDAHP will also prepare a simple booklet, in accessible Khmer language and with easily understood illustrations, explaining the requirements of the LMP as applicable to contracted workers in the project. The booklet will include details of the Worker Grievance Redress Mechanism. This booklet will be disseminated to all project direct workers.

ANNEX 1: GAP ANALYSIS OF THE LABOR LAW (1997) VS. ESS2 REQUIREMENTS

ESS2 REQUIREMENT	LABOR LAW	KEY GAPS	COMMENT ON PRACTICE	PROJECT MEASURES
Terms and Conditions of Employment	<p>Employer must keep a copy of the Labour Law at disposal of workers (Art.14)</p> <p>All enterprises with 8 or more workers to establish and display internal regulations (Sect. III)</p> <p>All workers to have employment cards (except seasonal farm workers)</p> <p>Contracts can be written or verbal (Art. 65)</p>	<p>Limitation to enterprises with 8 or more workers is not consistent with ESS2.</p>	<p>Less formal enterprises may not be aware of these rules.</p> <p>Unlikely that employment cards could be obtained for any type of temporary worker</p>	<p>Project direct workers will have clear terms and conditions of employment.</p> <p>Contractors to be required to comply with Labour Law provisions.</p>
Non-Discrimination and Equal Opportunity	<p>Labour Law (Arti.12) prohibits discrimination.</p> <p>Law on the Protection and the Promotion of the Rights of Persons with Disabilities (2009), Chapter 7 prohibits discrimination and mandates a quota system for employment of people with disabilities.</p>	<p>There is no gap except the requirement to develop an LMP. This LMP outlines the project's commitment to non-discrimination and equal opportunity.</p>	<p>No clear enforcement mechanism</p> <p>Not clear that quotas for employment of people with disabilities are set by Sub-Decree (as required by the Law) and / or enforced in practice.</p>	<p>Non-discrimination and equal opportunity to be applied to employment of project direct workers.</p> <p>The LMP contains the provisions relating to non-discrimination and equal opportunity and can be updated. The GRM also includes provisions to raise grievances in cases where these non-discrimination measures have not been observed.</p>

ESS2 REQUIREMENT	LABOR LAW	KEY GAPS	COMMENT ON PRACTICE	PROJECT MEASURES
				Fair and non-discriminatory employment practices to be required for contracted workers. Where contractors hire workers from the beneficiary community, disadvantaged and vulnerable community members are to have equal access to opportunities. Where large numbers of community members are employed, childcare facilities to be provided.
Rights to Organise	Chapter V provides framework for collective labor agreements. Chapter XI guarantees right to form a union (except public employees)		Labor unions are prominent in garment industry but not common in other sectors	Both the Labor law and LMP recognize the rights to form and participate within workers organisations.
Prevention / restriction of child labor	Minimum working age is 15 (Art. 177), but children aged 12-15 can be hired for light work that does not interfere with schooling. Prakas 002 (2008) details permitted types and hours of light work. Workers under 18 not permitted to undertake hazardous work (Art. 177)	ESS2 does not permit light work for children under minimum employment age (15 in Cambodia) Exception in case that hazardous work is permitted in advance by MoLVT	Employment of children working alongside parents in agricultural labor is known to occur. There are persistent allegations that this is also a common practice in brick kilns, associated with debt bondage and hazardous working conditions. ILO-IPEC Time-Bound Programme, 2004, targeted	The LMP and Project will restrict child labor under 18 either as Direct, Contracted or Primary Supply Workers No children aged under 15 to be employed under any circumstances (including community work). Minimum age for project workers is 18. Children aged 15-17 will not be employed as direct project workers under any circumstances.

ESS2 REQUIREMENT	LABOR LAW	KEY GAPS	COMMENT ON PRACTICE	PROJECT MEASURES
	<p>Workers under 18 not permitted to work at night (but many exceptions, Art. 175)</p> <p>Ministry of Labour can permit exemptions from minimum working age provisions (Art. 177)</p> <p>Prakas 106 (2004) provides a list of hazardous tasks prohibited to child workers except with permission from MoLVT. Prohibited list includes work at construction/renovation sites except for “designated safe areas”</p>	<p>(Art 177 and Prakas 106) does not appear to be consistent with ESS2</p> <p>ILO (2014) note that prohibitions on child labor are applied only in the context of formal employment, whereas most child workers are in non-formal work agriculture</p>	<p>10 locations / sectors including salt production, fishing, rubber plantations, brick industry, child domestic workers and child porters, especially at border crossing</p>	<p>Children aged 15-17 will not be employed as contracted workers in a manner that is likely to be hazardous or interfere with the child’s education or be harmful to the child’s health or physical, mental, spiritual, moral or social development.</p> <p>Children aged 15-17 will only be employed as contracted workers with advance notification and under restricted conditions.</p> <p>Age of employees to be verified and monitored as part of contract supervision.</p> <p>Suppliers to certify non-use of child labour, with verification measures in high-risk sectors.</p>
Prevention of forced labour	Forced labour (Art. 15) and debt bondage (Art.16) are prohibited		Debt bondage is known to occur	<p>Any kind of forced labor, including debt bondage, prohibited.</p> <p>Suppliers to certify non-use of forced labor, with verification measures in high-risk sectors</p> <p>Project to monitor and report including notification on any incident within 48 hours.</p>

ESS2 REQUIREMENT	LABOR LAW	KEY GAPS	COMMENT ON PRACTICE	PROJECT MEASURES
Grievance Mechanism	Not specifically mentioned, except for role of shop stewards in grievance mediation (Art. 284, 297)	Legislation does not guarantee workers' access to a grievance mechanism. There is no specific GRM process for employees working with individual contracts.		Project to establish and operationalise a project worker grievance mechanism. Project will monitor and report on implementation of the mechanism, A GRM will be prepared within the LMP.
Identification of potential hazards	All establishments and workplaces must be set up to guarantee the safety of workers (Art. 230)		Enforcement of safety standards is generally weak, especially in informal sectors and in the construction industry.	Health and safety risk assessment procedure to be established.
Provision of preventive and protective measures	Art. 229 says this is to be covered by a Prakas			Occupational Health and Safety (OHS) strategy established for direct project workers Workplace safety measures for contracted workers under Environment, Social, Health and Safety Specification (ESHS)
Training of workers and maintenance of training records	Safety training not specifically mentioned			ESHS to require appropriate safety training for workers before the project starts and during the implementation phase.

ESS2 REQUIREMENT	LABOR LAW	KEY GAPS	COMMENT ON PRACTICE	PROJECT MEASURES
Documentation and reporting of occupational accidents, disease, and incidents	Not clear	ESS2 requires reporting procedures		All workplace health and safety incidents to be recorded in a register, required by ESHS
Emergency Preparedness	Not specifically mentioned			All worksites to have health and safety plan including emergency plans (ESHS)
Remedies for adverse impacts	Managers of enterprise are liable for all work-related accidents (Art. 249) Insurance to be obligatory (Art. 256) but wording is not very clear		Only 11% of construction workers insured (Phnom Penh Post 09/01/2020)	All workers to be insured for occupational hazards (ESHS)

ANNEX 2: LAW PERTAINING TO CHILD AND FORCED LABOR

Applicable policies on Labor and Working Conditions, and Occupational Health and Safety as it applies to child and forced labour are enumerated in the below table.

Law	Summary
Labor Law (1997)	<p>Includes occupational health safety provisions not provided for sanitary landfills and other waste management facilities. The law also establishes the responsibility of employers in the workplace, including provision of protective equipment, ensuring safe and clean work environment and safety of the workers, and bearing responsibility in work-related accidents, including compensation. (Labor Law 1997, Chapter VIII and IX)</p> <p>The law is applicable to all employment contracts within the territory of the Kingdom of Cambodia, regardless of where the contract was made and what the nationality and residences of the contracted parties are. This law applies to every enterprise or establishment across all industries and sectors.</p> <p>On child labor, the minimum allowable age for wage employment is set at fifteen (15) years, and eighteen (18) years for hazardous work. Children between twelve (12) to fifteen (15) years old can be hired to do light work as long as the nature of work fulfils the following: (1) work is not hazardous to their health or mental and physical development., (2) work will not affect their regular school attendance, their participation in guidance programs or vocational training approved by a competent authority. For child laborers from 15 to 17 years old cannot perform night work, Employers found to be employing children less than eighteen years of age under conditions contrary to the provisions of the Labor Law (1997) are liable to a fine of thirty-one to sixty days of the base daily wage (Chapter VI, Section 8 and Article 368 of Chapter XVI).</p>

Law	Summary
<p>Prakas No. 002 on Category of Occupation and Light Work Permitted for Children (2008)</p>	<p>Light work for child labourers aged 12 to 15 years old, pertaining to those that does not affect the health as well as mental and physical development of the employed children and does not affect their regular school attendance, involvement in orientation programs, or vocational trainings required by the competent authorities, have been identified including receiving, packing, selecting and classifying goods as well as assembling light things, including opening or taking goods out of the package, among others.</p> <p>Those who employ children from 12 to 15 years old for light work shall allow their parents or guardian to understand the terms and conditions of employment, including the children’s working time, school attending time, vulnerability to work-related accidents and diseases, adopted measures on hygiene and work safety.</p> <p>Work hours for these children shall not exceed four (4) hours for school days, and seven (7) hours for school-free days. They are also prohibited from working between 8:00 pm to 6:00 am. They are entitled to two (2) consecutive days off per week.</p>
<p>Prakas No. 106 on the Prohibition of Hazardous Child Labor (2004)</p>	<p>The Ministry of Social Affairs, Labour, Vocational Training and Youth Rehabilitation released a Prakas in 2004 prohibiting the employment of children below 18 years old on jobs involving hazardous works involving construction/renovation and demolition (with exception to designated safe areas with permit from labour inspector), exposure to hazardous chemicals and substances, exposure to fumes, dust gas and other ambient substances, heavy machinery and equipment.</p> <p>Employers considering employing children of 16 years of age to do hazardous work are required to secure a permit from the Ministry and must adhere to the following:</p> <ul style="list-style-type: none"> • No work between 10:00pm to 5:00am • Children undergo training • Consultation with Labor Advisory Committee • Annual health check-ups with Department of Labour Health to certify that they are in the proper health condition to engage in hazardous work. <p>As noted by the International Labour Organization, the existing Labor Law (1997) only covers the formal sector and does not apply to the informal sector where child labour mostly occurs (ILO, 2014)</p>

Law	Summary
Law on Suppression of Human Trafficking and Sexual Exploitation (2008)	<p>All forms of human trafficking and sexual exploitation, including forced labour or services, slavery, or practices similar to slavery, debt bondage, involuntary servitude, and child labour, for profit-making is declared unlawful under this law. In the explanatory note on the law by the Ministry of Justice, forced labour is defined as all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily (IJM, 2016).</p>

ANNEX 3: GENERAL OHS GUIDELINES

The objective of this guideline is to provide guidance on the:

- Key principles involved in ensuring the health and safety of workers is protected;
- Preparation of Occupational Health and Safety plans.

The key reference document for this Guideline is the World Bank Group's Environmental, Health, and Safety (EHS) Guidelines (April 2007) and the World Bank's ESS 4 (<https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>).

The general OHS guidelines in terms of the responsibilities of employees will be incorporated in a code of conduct as part of the development of the sub-projects, which will be included in the procurement and contracting of the contractors and supervising engineers.

1. Principles

Employers must take all reasonably practicable steps to protect the health and safety of workers and provide and maintain a safe and healthy working environment. The following key principles are relevant to maintaining worker health and safety:

1.1 Identification and assessment of hazards

Each employer must establish and maintain effective methods for:

- Systematically identifying existing and potential hazards to employees;
- Systematically identifying, at the earliest practicable time, new hazards to employees;
- Regularly assessing the extent to which a hazard poses a risk to employees.

1.2 Management of identified hazards

Each employer must apply prevention and control measures to control hazards which are identified and assessed as posing a threat to the safety, health, or welfare of employees, and where practicable, the hazard shall be eliminated. The following preventive and protective measures must be implemented in order of priority:

- Eliminating the hazard by removing the activity from the work process;
- Controlling the hazard at its source through engineering controls;
- Minimizing the hazard through design of safe work systems;
- Providing appropriate personal protective equipment (PPE).

The application of prevention and control measures to occupational hazards should be based on comprehensive job safety analyses (JSA). The results of these analyses should be prioritized as part of an action plan based on the likelihood and severity of the consequence of exposure to the identified hazards.

1.3 Training and supervision

Each employer must take all reasonably practicable steps to provide to employees (in appropriate languages) the necessary information, instruction, training, and supervision to protect each employee's health and to manage emergencies that might reasonably be expected to arise in the course of work. Training and supervision include the correct use of PPE and providing employees with appropriate incentives to use PPE.

1.4 General duty of employees

Each employee shall:

- Take all reasonable care to protect their own and fellow workers health and safety at the workplace and, as appropriate, other persons in the vicinity of the workplace;
- Use PPE and other safety equipment supplied as required; and
- Not use PPE or other safety equipment for any purpose not directly related to the work for which it is provided.

1.5 Protective clothing and equipment

Each employer shall:

- Provide, maintain and make accessible to employees the PPE necessary to avoid injury and damage to their health;
- Take all reasonably practicable steps to ensure that employees use that PPE in the circumstances for which it is provided; and
- Make provision at the workplace for PPE to be cleaned and securely stored without risk of damage when not required.

2. Design

Effective management of health and safety issues requires the inclusion of health and safety considerations during design processes in an organized, hierarchical manner that includes the following steps:

- Identifying project health and safety hazards and associated risks as early as possible in the project cycle including the incorporation of health and safety considerations into the worksite selection process and construction methodologies;
- Involving health and safety professionals who have the experience, competence, and training necessary to assess and manage health and safety risks;
- Understanding the likelihood and magnitude of health and safety risks, based on:
 - The nature of the project activities, such as whether the project will involve hazardous materials or processes;
 - The potential consequences to workers if hazards are not adequately managed;
- Designing and implementing risk management strategies with the objective of reducing the risk to human health;
- Prioritizing strategies that eliminate the cause of the hazard at its source by selecting less hazardous materials or processes that avoid the need for health and safety controls;
- When impact avoidance is not feasible, incorporating engineering and management controls to reduce or minimize the possibility and magnitude of undesired consequences;
- Preparing workers and nearby communities to respond to accidents, including providing technical resources to effectively and safely control such events, in particular relating to traffic;
- Improving health and safety performance through a combination of ongoing monitoring of facility performance and effective accountability.

3. Implementation

3.1 Documentation

An Occupational Health and Safety Management Plan (OHSMP) must be prepared and approved prior to any works commencing on site. The OHSMP must demonstrate the Contractor's understanding of how to manage safety and a commitment to providing a workplace that enables all work activities to be carried out safely. The OHSMP must detail reasonably practicable measures to eliminate or minimize risks to the health, safety and welfare of workers, contractors, visitors, and anyone else who may be affected by the operations. The OHSMP must be prepared in accordance with the World Bank's EHS Guidelines and the relevant country health and safety legislation.

3.2 Training and Awareness

Provisions should be made to provide health and safety orientation training to all new employees to ensure they are apprised of the basic site rules of work at / on the site and of personal protection and preventing injury to fellow employees. Training should consist of basic hazard awareness, site-specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate. Training should also include COVID-19 and influx related health and safety issues such as potential sexual transmitted diseases (e.g., HIV/AIDS) awareness training.

Visitors are not permitted to access to areas where hazardous conditions or substances may be present, unless appropriately inducted.

3.3 Personal Protective Equipment (PPE)

Personal Protective Equipment (PPE) provides additional protection to workers exposed to workplace hazards in conjunction with other facility controls and safety systems.

PPE is a last resort that is above and beyond the other facility controls and provides the worker with an extra level of personal protection. The table below presents general examples of occupational hazards and types of PPE available for different purposes. Recommended measures for use of PPE in the workplace include:

- Active use of PPE if alternative technologies, work plans or procedures cannot eliminate, or sufficiently reduce, a hazard or exposure;
- Identification and provision of appropriate PPE that offers adequate protection to the worker, co-workers, and occasional visitors, without incurring unnecessary inconvenience to the individual;
- Proper maintenance of PPE, including cleaning when dirty and replacement when damaged or worn out. Proper use of PPE should be part of the recurrent training programs for Employees
- Selection of PPE should be based on the hazard and risk ranking described earlier in this section and selected according to criteria on performance and testing established.

Table A 1 Suggested PPE corresponding to potential workplace hazards

Objective	Workplace Hazards	Suggested PPE
Eye and face protection	Flying particles, molten metal, liquid chemicals, gases or vapours, light radiation.	Safety Glasses with side-shields, protective shades, etc.

Head protection	Falling objects, inadequate height clearance, and overhead power cords.	Plastic Helmets with top and side impact protection.
Hearing protection	Noise, ultra-sound.	Hearing protectors (ear plugs or earmuffs).
Foot protection	Falling or rolling objects, pointed objects. Corrosive or hot liquids.	Safety shoes and boots for protection against moving & falling objects, liquids, and chemicals.
Hand protection	Hazardous materials, cuts or lacerations, vibrations, extreme temperatures.	Gloves made of rubber or synthetic materials (Neoprene), leather, steel, insulating materials, etc.
Respiratory protection	Dust, fogs, fumes, mists, gases, smokes, vapours.	Facemasks with appropriate filters for dust removal and air purification (chemicals, mists, vapours, and gases). Single or multi-gas personal monitors, if available.
	Oxygen deficiency	Portable or supplied air (fixed lines). On-site rescue equipment.
Body/leg protection	Extreme temperatures, hazardous materials, biological agents, cutting and laceration.	Insulating clothing, body suits aprons etc. of appropriate materials.

3.4 Specific requirements relating to COVID-19 pandemic (if applicable)

The following general actions are recommended for implementation in accordance with the ESF/Safeguards Interim Note: Covid-19 Considerations in Construction/Civil Works Projects, issued on April 7, 2020.

- All workplace health and safety incidents to be properly recorded in a register detailing the type of incident, injury, people affected, time/place and actions taken including COVID-19 cases in the workforce, which should be reported to EA and the World Bank immediately;
- All workers (irrespective of contracts being full-time, part-time, temporary or casual) to be covered by insurance against occupational hazards and COVID-19, including ability to access medical care and take paid leave if they need to self-isolate if contracted COVID-19;
- Procedures confirming workers are fit to work, which may include temperature testing and refusing entry to sick workers (with insurance in place to cover payment, as described above);
- All work sites to identify potential hazards and actions to be taken in case of emergency, including COVID-19 cases.

- Any on-site accommodation, if applicable, to be safe and hygienic, and with distancing guidelines in place, including provision of an adequate supply of potable water, washing facilities, sanitation, accommodation, and cooking facilities.
- Workers residing at site accommodation to receive training in preventing prevention of infection through contaminated food and/or water, COVID-19 prevention, and avoidance of sexually transmitted diseases.
- Provide laminated signs of relevant safe working procedures in a visible area on work sites, in English and local language as required, including on hand hygiene and cough etiquette, as well as on symptoms of COVID-19 and steps to take if suspect have contracted the virus;
- Provide PPE, including COVID-19 specific PPE, as suitable to the task and hazards of each worker, without cost to the worker.

4. Monitoring

Occupational health and safety monitoring programs should verify the effectiveness of prevention and control strategies. The selected indicators should be representative of the most significant occupational, health, and safety hazards, and the implementation of prevention and control strategies. The occupational health and safety monitoring program should include:

- Safety inspection, testing and calibration: This should include regular inspection and testing of all safety features and hazard control measures focusing on engineering and personal protective features, work procedures, places of work, installations, equipment, and tools used. The inspection should verify that issued PPE continues to provide adequate protection and is being worn as required.
- Surveillance of the working environment: Employers should document compliance using an appropriate combination of portable and stationary sampling and monitoring instruments. Monitoring and analyses should be conducted according to internationally recognized methods and standards.
- Surveillance of workers health: When extraordinary protective measures are required (for example, against hazardous compounds), workers should be provided appropriate and relevant health surveillance prior to first exposure, and at regular intervals thereafter.
- Training: Training activities for employees and visitors should be adequately monitored and documented (curriculum, duration, and participants). Emergency exercises, including fire drills, should be documented adequately.
- Accidents and Diseases monitoring. The employer should establish procedures and systems for reporting and recording:
 - Occupational accidents and diseases;
 - Dangerous occurrences and incidents.

These systems should enable workers to report immediately to their immediate supervisor any situation they believe presents a danger to life or health. The contractor shall supply data on trainings delivered, safety incidents prevented and any accidents to GDAHP. These data are to also include incidents related to any sub-contractors working directly, or indirectly, for the contractor.

The GDAHP and World Bank (WB) shall be notified of any incident in accordance with the standards of incident classification below:

Table A 2 Standards of incident classification

Incident Severity Class	Incident Classification	Notification timeframe
Class 1	Fatality	As soon as possible
	Notifiable Injury, Illness or Incident	As soon as possible
Class 2	Lost Time Injury	As soon as practicable but within 48 hours
	Medical Treatment	Within 72 hours

All Class 1 and Class 2 health and safety incidents must be formally investigated by the Contractor and reported to the GDAHP and World Bank through an investigation report. This report shall be based on a sufficient level of investigation by the Contractor so that all the essential factors are recorded. Lessons learnt must be identified and communicated promptly. All findings must have substantive documentation. As a minimum the investigation report must include:

- Date and location of incident;
- Summary of events;
- Immediate cause of incident;
- Underlying cause of incident;
- Root cause of incident;
- Immediate action taken;
- Human factors;
- Outcome of incident, e.g., severity of harm caused, injury, damage;
- Corrective actions with clearly defined timelines and people responsible for implementation;
- Recommendations for further improvement.

ANNEX 4: SAMPLE CODE OF CONDUCT

The objective of this sample workers' Code of Conduct (COC) is to provide guidance on the key policy/principles and expectations for workers' behaviors at workplace, or during daily contact with the community.

Workers Code of Conduct (WCC)

This conceptual worker code of conduct (WCC) has been developed to outline the basic expectations the workforce will need to adhere to as part of meeting the overall compliance obligations as outlined within the Labor Management Plan (LMP) and ESS2. This WCC is intended to apply to all Direct Workers, Contracted Workers and Primary Supply Workers within the Project and will be developed into a detailed WCC as part of final project characterization and planning. In addition to further elaborating the principles and concepts as detailed within this WCC, the detailed WCC will also need to capture roles and responsibilities, training and induction, monitoring, implementation, and any locally specific conditions that are directly aligned with the Cambodia Inclusive Livestock Value Chains Project and any sub-projects.

Core Principles

The workers shall:

- Carry out his/her duties competently and diligently;
- Comply with this Code of Conduct (as detailed below) and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other workers and any other persons;
- Report any violations of this COC and will not retaliate any person who reports violations of this Code of Conduct.

General Workplace Expectations:

- All workers are expected to be "fit for work" as it relates to an individual's capacity to perform their assigned role safely, competently and without presenting a risk to themselves, the organization, environment, and surrounding communities. In addition to qualifications and experience, this incorporates factors such as fatigue, alcohol and/or drug use, medical fitness, and general mental well-being.
- All workers have a right to stop work at any time and provide notification to their supervisor or manager should any construction or operational site conditions be deemed as unsafe. The relevant supervisor or manager will take steps to ensure that the danger is addressed and provide notification as to when works can resume. Conversely, supervisors and managers have the right to stop works if any workers are conducting themselves or their activities in an unsafe manner. Any workers subject to such a stop work order will be required to undergo further training as outlined within the LMP.
- All workers need to report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and danger to his/her life or health.
- All workers are expected to be aware of the roles, responsibilities, and obligations in relation to compliance with the LMP and associated policies and procedures.
- The workplace is to be an environment where people can conduct themselves and engage with one another and management without fear of reprisals, blackmail, requirement to engage in any illegal conduct or being subjected to any forced labor as defined by the ILO.

- All workers maintain a safe working environment including by:
 - ensuring that workplaces, machinery, equipment, and processes under each person’s control are safe and without risk to health.
 - wearing required personal protective equipment.
 - using appropriate measures relating to chemical, physical, and biological substances and agents; and
 - following applicable emergency operating procedures.

Anti-discrimination and cultural awareness

- All workers are to be respectful of on another, the local communities in which they work, and any individuals engaged in waste-based livelihoods on a site being developed and operated within the Project. No discrimination, direct or indirect, on the grounds of age, disability, gender identity, marriage and civil partnership status, pregnancy or maternity, race, religion or belief, sexual orientation or livelihood type will be tolerated.
- All workers will be provided an understanding of local settings and cultural norms for the sub-project sites and surrounding communities, including any local customs and traditions, socially and culturally appropriate behavior (including religious observances, clothing, use of alcohol, language, and tone of voice, etc.), procedures to follow when interacting with members of the local community, and permission to seek prior to engaging with the local community.
- Disturbance to any architectural, historical, or cultural heritage feature or artefacts is prohibited. All workers are to follow the Chance Finds Procedure contained within the ESMF.
- Measures will be taken to prevent and address harassment, intimidation and/or exploitation of women in both the workplace and surrounding communities. This includes a zero-tolerance policy to any form of sexual harassment, with all incidents and allegations being treated and serious and subject to investigation.

Waste, Hygiene and Environmental Considerations

- All works have responsibility for ensuring the physical and biological environments of the sub-project settings are appropriately protected.
- All workers are expected to contribute to healthy and hygienic conditions across all project offices and sub-project sites through observing prohibitions on disposal of waste in unauthorized locations, indiscriminate disposal of waste, domestic waste, and construction waste, and engaging with non-approved waste management contractors for end-point disposal of hazardous and non-hazardous waste.
- All workers are expected to contribute to the management of the physical and biological environments through following good practice as detailed within the ESMF, and observing prohibitions on cutting, damaging, or removing vegetation (excepting where explicitly approved for a sub-project), collection of plants and firewood for sale or personal use, burning of waste and/or cleared vegetation, and washing of vehicles and items of plant in local waterways.
- All workers are prohibited from harming, capturing and/or poaching wildlife. This includes fishing and the keeping of any caged animals within any Project offices or sub-project sites.
- Only designated individuals (such as wildlife carers) will be allowed to remove wildlife from any sub-project sites.

Generally Prohibited Behaviors

- Workers are not to cause a nuisance to any local communities or to other workers within the Project. This includes conducting in behaviors such as use of threatening or abusive language,

violent, disorderly, offensive or threatening actions or speech that causes unreasonable disruption or potential for conflicts, and intentional or willful damage to properties, or actions that are not consistent with the regulations of Cambodia.

- All workers are prohibited from consuming alcohol during working hours and working while under the influence of alcohol.
- Only medically prescribed drugs are permitted to be consumed by workers. Any worker found to be in possession of, or consuming, illicit drugs will be subject to immediate disciplinary action up to and including termination.
- Smoking will only be permitted in designated smoking areas during work breaks.
- All workers will be required to adhere to a strict no alcohol, drugs, firearms, or gambling policy at all times. The Project has a zero-tolerance policy for such activities in all its offices and in the construction and operation of any sub-projects.

Policies on Non-Discrimination and Prohibitions against Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)

All workers will:

- treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers, or children.
- not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel.
- not engage in Sexual Exploitation.
- not engage in Rape.
- not engage in Sexual Assault; and
- not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage.

Disciplinary Actions

- Any unsatisfactory conduct and actions that lead to non-conformance with this WCC will be subject to disciplinary actions. Conduct and actions that may lead to disciplinary action may include, but not limited to:
 - Not abiding by expectations established within the WCC or the ESMF
 - Actions that create health and safety hazards and risks to project workers, local communities, waste pickers or contractors
 - Gender based violence and discrimination.
 - Unacceptable behaviors as listed within this WCC.
 - Consistent lateness or absences without reasonable explanation
 - Failure to follow instructions, rules, or procedures such as those contained within the ESMF and LMP
 - Failure to report incident to management, regardless of whether any injury or damage occurs. This includes any damage caused directly by the individual.
- In cases of severe misconduct, the project retains the authority to terminate employment, taking into consideration the regulatory provisions of the Kingdom of Cambodia. Severe misconduct encompasses various actions, including but not limited to theft of property, physical or sexual assault against fellow workers or individuals from the public/community, intentional destruction of property, fraudulent behavior, involvement in any form of corruption, consumption of drugs

or alcohol, engaging in illegal activities, and any violations of the WCC or ESMF that may result in significant risks to the health and safety of other workers and the surrounding community members.