

LABOR MANAGEMENT PROCEDURES

GOVERNMENT OF EGYPT/ Ministry of Environment

Greater Cairo Air Pollution Management and Climate Change Project

Update

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1. OVERVIEW OF LABOR USE ON THE PROJECT

Introduction

Under the World Bank Environmental and Social Standard 2 (ESS2: Labor and Working Conditions), the Borrower is required to develop labor management procedures (LMP). The purpose of the LMP is to identify the main labor requirements and risks associated with the project, and help the Borrower to determine the resources necessary to address project labor issues. The LMP will enable different project-related parties, for example, staff of the project implementing unit, contractors and sub-contractors and project workers, to have a clear understanding of what is required on a specific labor issue. The LMP is a living document, which is initiated early in project preparation, and is reviewed and updated throughout development and implementation of the project.

Brief project description

The Greater Cairo Air Pollution Management and Climate Change Project aims at reducing air pollution from two main sources of air pollution in Greater Cairo (GC) Region caused by: (i) open burning of municipal solid waste; and (ii) vehicle emissions. Geographically, the project covers the Greater Cairo Region, which is composed of Cairo Governorate, the urban areas of Giza Governorate and the urban areas of Qalyoubia Governorate. The main objectives of the project will be to:

- Enhance the Air Quality Decision Support System
- Support the Operationalization of SWM Master Plans in GC
- Achieve vehicle emissions reduction
- Ensure stakeholders engagement, awareness raising, and communication are well conducted.

Type of workers

In this project, different types of workers exist: Direct Workers; Contracted Workers; and Primary Supply Workers. Direct Workers will mainly include the staff of the Project Coordination Unit (PCU), Working Groups, and Implementation units (IUs) as well as project consultants and the Independent Verification Agent. The Contracted Workers will be involved in the different construction activities and Primary supply workers will consist of those providing raw materials, food and supplies throughout the project implementation. It is not foreseen that community and/or migrant workers will be deployed in this project.

Number of Project Workers:

The total number of workers is not yet firm, but the following estimate is provided:

The total number will be approximately 665 divided into: 60 Direct Workers; 550 Contracted; and 60 Primary Supply Workers. The estimated numbers are based on the assumptions below.

	Estimated number of workers per	Comments
Direct Workers		
PCU	10	

Working groups ¹	18	
IUs	21	
Consultants and Independent Verification Agent	11	
Total	60	
Contracted Workers (involved in: different construction activities; healthcare waste management; driving and operating buses)		
Surrounding infrastructure	60	
Qalyoubia sanitary landfill cell 1	60	
Abu Zaabal rehabilitation	60	
Hazardous waste facility	60	
Transfer stations	90	Assumed 3 transfer stations and 30 workers per each
Bus depot upgrade	20	
Healthcare waste management workers	40	
E-waste management workers	30	
Bus drivers and operators	130	
Total	550	
Primary Supply Workers		
Surrounding infrastructure	10	
Qalyoubia sanitary landfill cell 1	10	
Abu Zaabal rehabilitation	10	
Hazardous waste facility	10	
Transfer stations	15	
Bus depot upgrade	5	
Total	60	

Characteristics of Project Workers:

All workers are expected to be local. Female workers are expected to constitute approximately 30% of the Direct Workers and less than 5% of the Contracted and Primary Supply Workers. It is not expected that the project will hire workers between the minimum age and 18.

¹ Working groups refer to the technical groups providing technical assistance throughout the project implementation

Timing and Description of Labor Requirements:**1- Direct Workers**

The Project will employ Direct Workers for the Project Coordination Unit (PCU) to be formed at the Ministry of Environment (MoE); three working groups under MoE, Ministry of Local Development (MoLD), and Cairo Transport Authority (CTA); and Four Implementation Units (Air Quality Management; Solid waste Management (SWM); Vehicle Emissions; and Stakeholders Engagement and Awareness Implementation Units (IUs)). The PCU and the IUs, will be established before effectiveness and will be maintained throughout the project's duration. Other Direct Workers will include individual consultants who will be assigned throughout the Project implementation. The project will also most likely hire an Independent Verification Agent (IVA). It is estimated that the Project will hire a total of 60 Direct Workers.

Government civil servants will be involved in the project coordination and supervision including the MoE, MoLD, Waste Management Regulatory Authority (WMRA), Ministry of electricity, Ministry of Health and Population, university hospitals waste management staff, Cairo Transport Authority (CTA), Ministry of Transport (MoT), Land Transport Regulatory Authority, and governorate management staff and workers (i.e., executive SWM units and heavy equipment drivers). The government civil servants will remain subject to the terms and conditions of the existing public sector employment agreement and ESS2 and these Labor Management Procedures (LMPs) will not apply to such government civil servants. However, conditions of OHS, and restriction on child labor and forced labor are three conditions that would still apply to the civil servants.

2- Contracted Workers

The Project will use the service of consulting firm(s) for the different Environmental and Social (E&S) documents and plans to be developed, technical design, feasibility study, construction supervision, training, and compliance audits during both construction and operation phases. Upon completion of design and feasibility studies, contractors for the different sub-projects will be hired for the construction work. The different subprojects will be operated by the private sector (via a Design-Build-Operate scheme). Besides the operation staff, the Project will also hire contractors for maintenance work; healthcare waste management; third party auditors; and consulting firms. It is estimated that the Project will hire a total of 550 Contracted Workers.

3- Primary Supply workers:

Primary supply workers include suppliers who on an ongoing basis will be providing goods and materials that are essential for the core function of the different project components. examples of preliminary suppliers in include service providers of construction materials, waste collection services, catering, etc. It is estimated that the Project will hire a total of 60 Primary Supply Workers.

2. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

2.1 Project activities:

The proposed project is composed of six (06) components, which aim at reducing air pollution from two main sources of air pollution in Greater Cairo Region: (i) open burning of municipal solid waste; and (ii) vehicle emissions. The five components and activities under each are summarized below:

Component 1: Enhancing the Air Quality Decision Support System

Activities include:

- Preparing plans
- Strengthening air quality monitoring information system
- Financial cost estimation and cost-effectiveness analyses
- Improving air quality forecasting tools
- Establishing institutional response mechanisms

Component 2: Support the Operationalization of SWM Master Plans in GC

Activities include:

- Establishing the Integrated Waste Management Facility at the 10th of Ramadan including infrastructure, sanitary landfill for Qalyoubia governorate, medical waste treatment and disposal facility, Construction & Demolition (C&D) waste treatment facility
- Closing and Rehabilitation/Containment of Priority Dumpsites including preparation of environmental audit, feasibility study and detailed engineering studies and closure and containment of Abu Zaabal's dumpsite,
- An industrial hazardous waste treatment and disposal facility including preparing a feasibility study, and the environmental and social assessments studies and establishing the facility.
- Construction of environmentally controlled transfer stations
- Acquisition of heavy equipment for the transfer of waste from collection points
- Establishment of a solid waste educational center for the general public
- A detailed assessment of Akrasha area (institutional, technical and financial) to formulate recommendations to address various issues of the site and identify project's intervention.
- Establishment and reinforcement of institutional and regulatory frameworks, financial sustainability and cost recovery mechanisms that are crucial for the SWM value chain. This will entail design and planning, monitoring and evaluation instruments, capacity building, advisory services for waste operators and relevant studies and assessments needed for the identification, design and implementation of proposed investments

Component 3: Vehicle emissions reduction

Activities include:

- Study to select the final set of routes
- The design of the bus, the design of the retrofit needed in a selected bus depot to accommodate charging stations, maintenance facilities, and power supply

- Design of the retrofit in chosen buses depositories to accommodate charging stations including installation of fast charging stations, maintenance and cleaning facilities.
- Procurement and operation of e-buses

Component 4: Stakeholders' engagement, awareness raising and communication

The main objective of this component is to ascertain the engagement of all stakeholders in all phases of the project, i.e., design, implementation and monitoring. Such active involvement and the full consultative participatory approach will result in a constructive relationship between the different stakeholders and the government. This component represents an integral part to the stakeholders' engagement comprehensive plan, which is part of the environmental and social risk management and the Stakeholders Engagement Plan (SEP).

Component 5: Project Management and Monitoring & Evaluation

This component will cover project management functions that include fiduciary management, monitoring and evaluation, technical reporting and audits. A PCU will be established at the Ministry of Environment, which is a project partner along with the MoLD and will be responsible for the implementation of components 1, 3 and 4. However, the project will also work with other ministries such as the Ministry of Transport, Ministry of Electricity and Ministry of Health and Population, while the executing entities of the project will be Egyptian Environmental Affairs Agency (EEAA), Waste Management Regulatory Authority (WMRA), the Central and Regional SWM Units of the MoLD, Qalyoubia Governorate and Cairo Transport Authority (CTA).

- **Component 6 titled "Enhanced E-Waste and HCW management for Reduction of uPOPs"**
- This new component will be added to the "parent project." This Component will comprise three sub-components as described below:
 - **Sub-component 6.1:** Supporting effective E-Waste management, models, and solutions
 - This sub-component will support the implementation of the National Policy Framework and Legal Directive on E-Waste and piloting solutions and models for E-Waste management and recycling to reduce air pollution and climate pollutant emissions. Activities are designed to support the country in a life-cycle approach to E-Waste from understanding its generation to safe recycling and safe extraction of precious commodities. Specific activities will include: (i) strategy development and guidance for used electronic equipment, particularly at the household level including batteries and electrical appliances and their integration into existing strategies for the refurbishment, recycling, disposal and/or take back of equipment/E-Waste; (ii) technical assistance, guidance, and capacity building for key public and private sector entities and agencies for the enforcement and implementation of upcoming extended producer responsibility schemes (EPR) for new electronic equipment; (iii) support to recyclers of E-Waste, including: assessment and technical assistance for enhanced efficiency in recycling processes, development of strategies and support for safe and effective recycling of batteries, development of risk assessment studies and risk mitigation strategies and capacity building for recyclers to ensure safer/cleaner processing for improved human and environmental health, and establishing safe exposure limits for key uPOPs; (iv) support for alignment with the globally harmonized system on waste and E-Waste, particularly with regard to developing train-the-trainer programs and other training/educational tools and products; (v) technical assistance on guidance for assessing, processing and/or exporting of printed circuit boards; (vi) support for

updating and monitoring of E-Waste data and utilization of the uPOPs toolkit and E-Waste calculator for E-Waste processing and needs assessment for establishing an integrated management information system (MIS); (vii) piloting collection, safe dismantling, and recycling of E-Waste, particularly older equipment and household level E-Waste at strategic locations and segregation and hazardous waste disposal, particularly waste which will not be targeted through EPR; (viii) testing of 'take-back' schemes and enhancing engagement with the private sector; and (ix) testing of financing tools for start-ups and small and medium enterprises in E-Waste recycling and exploration of supporting enterprises in possible markets for recycled materials (e.g., gold, copper, silver) nationally, regionally, and internationally; and (viii) supporting further integration of informal sector players and those recently 'formalized.'

- **Sub-component 6.2:** Supporting effective healthcare waste management, models, and solutions
- This sub-component will support activities to strengthen the enabling environment for sound management of Healthcare Waste and pilot innovative solutions for sound management of Healthcare Waste for reduction of air pollution, climate pollutant and uPOPs emissions to yield long-term results and systems-wide change. Specific activities will include: (i) undertaking an assessment of current data on HCW in a range of healthcare settings, including university and health insurance hospitals, pharmacies, etc.; (ii) providing support for key agencies in the development of an integrated management information system (MIS) to support enhanced monitoring of HCW management and disposal practices; (iii) providing technical assistance to select healthcare institutions, including on utilization of possible financial mechanisms, procurement of environmentally-sound equipment, training of staff, and integration with new protocols, including those on biological and chemical waste segregation and certification requirements; (iv) supporting the preparation of a plan to roll out proper HCW management throughout the country in line with new regulations and in collaboration with key agencies and stakeholders (including women and other vulnerable communities); (v) piloting appropriate recycling and re-sale of safely segregated HCW; and (vi) developing and modeling public/private financing and investment models for collection and treatment of HCW.
- **Sub-component 6.3:** Supporting the preparation of Egypt's application to Minamata Convention
- The GoE has recently decided to pursue application and signing of the Minamata Convention on Mercury. In support of these efforts and building on the results of sub-components 6.1 and 6.2, the project will provide international expertise and technical assistance activities towards the early-stage development of the application and initiation of key activities for the country's compliance with the convention. These activities include the following: (i) identifying current regulatory and policy needs for meeting obligations of the convention; (ii) identifying technical needs of EEAA, MoH and other agencies to successfully undertake changes for meeting convention obligations; and (iii) identifying and filling, as possible, current gaps in data and state of knowledge for successful preparation for signing.

The project's activities will therefore entail major construction work including but not limited to the infrastructure for 10th of Ramadan facility, sanitary landfill, industrial waste treatment and disposal facility, transfer stations. Component 5 will entail construction/refurbishment work of buses depot. The project activities will entail extensive consulting services including design services, preparation of studies, and conducting site audits and assessments. The project will be managed and monitored by the PCU formed under the MoE and four implementation units.

The key risks which the different types of labor may face are detailed below.

2.2 Key Labor Risks:

The key labor risks which may be encountered by the project Direct, Contracted and Primary Supply workers are listed below:

- **Occupational health & safety (OHS) risks:** the nature of the project, coupled with the weak safety culture in the country, will result in significant health and safety risks. The main causes of OHS risks include but are not limited to the following:
 - The construction activities involving heavy machineries will be quite noisy. Loud, repetitive, and excessive noise could cause long-term hearing problems, such as deafness. Noise can also be a dangerous distraction and may distract the worker from the task at hand, which increases the risk of accidents.
 - Heavy materials and equipment are expected to be constantly lifted and moved around by workers at site, which poses health and safety risks. Possible accidents could take place due to vehicles, loaders, and cars moving on the site internal roads.
 - Collapsing of trenches or excavated areas due to the absence or defect in the implemented soil reinforcement methods represent a significant risk to all workers involved in excavation work.
 - Working at height will also pose the risk of falling, as well as slippage and falling
 - With the hot and dry climate being experienced in Egypt, heat-related injuries such as heat stroke and heat exhaustion also pose a risk to the construction workers.
 - Fire hazards constitute a potential risk at all project sites (construction and administration).
 - Potential exposure to hazardous healthcare and electronic waste
 - Potential risks caused by electrocution from unprotected electricity cables
 - Potential risks caused by exposure to hazardous construction chemicals and waste
 - Traffic safety risks for bus drivers and waste collectors
 - COVID-19 infection risks
 - Workers' Lack of awareness/knowledge on the type and significance of OHS risks involved with their work.

With regards to specific risks related to additional finance those will include:

- Waste handling and infection control and spread of infection through improper managing of wastes
- Sprawling and spread of infectious and hazardous chemical wastes and e-waste

The below risks apply to project workers of the project at large, including the additional finance components.

- **Likely incidents of child labor or forced labor:** Though prohibited by Egyptian law, the common contractors' practices are suggesting potential risk of incident of child labor. Both the contractors and the children are likely in most cases to be unaware of the legislation. The child will be also likely unaware of his legal rights.
- **Unfair and/or unclear contract terms and conditions** including wages, overtime, compensation, benefits and working hours: In some cases, there might be no contracts issued as many workers will be assigned on a daily compensation basis.
- **Irregular payment of salaries:** the significance of this risk can also increase with the lack of an

efficient grievance mechanism (GM).

- **Discrimination and non-equal opportunities:** The project involve large scale construction activities and will involve several types of workers (Direct, contracted, and primary supply), with a large diversity of the scope of work. The scale and diverse nature of work increase the probability of occurrence of discrimination and non-equal opportunities risks.
- **Risks resulting from labor influx:** The project involves several construction sites in different locations. Workers' interactions might therefore occur giving rise to labor influx risks and impacts.
- **GBV/sexual exploitation and abuse (SEA):** The project workers will include both men and women, especially for the Direct workers. There is potential risk of GBV/sexual exploitation and abuse and sexual harassment (SH) and it should be mitigated through the appropriate mitigation measures.
- **Risk of labor unresolved complaints:** This risk could be a result of the lack of the absence of a GM, or the presence of inefficient and not properly designed GM
- **Restrictions related to freedom of association and collective bargaining**

3. BRIEF OVERVIEW OF NATIONAL LABOR LEGISLATION: TERMS AND CONDITIONS

Employment matters in Egypt are primarily regulated by the following legislative sources:

- Social Security Law No. 79/1975, as amended, and its executive regulations;
- Law No. 48 for the year 1978 governing public sector employees;
- Law No. 203 for the year 1991, addressing special requirements for employees working in the public commercial (business) sector of the State;
- Child Law No 12 of 1996;
- Law No. 12 for the year 2003 and its executive regulations, regulating relationship between employers and employees in private sector;
 - Child Law No 126 of 2008.

The different requirements relating to labor and working conditions are summarized below:

Minimum Working Age

The minimum age for hazardous work is 18 years old.

Minimum Wage

As of 2019 the minimum wage is 2,000 Egyptian pounds (EGP). The minimum obligatory annual increase is set at no less than 7% of the basic salary, which is the basis for calculation of social insurance.

The minimum premiums are set at 35% of the normal pay for overtime work during daylight and 70% for work at night-time; 100% for work performed on days off and holidays.

Working Hours and rest periods

According to the Labor Law, the maximum working hours per day are 8 hours, or 48 hours per week in case of a six-day work week. Worker shall receive a weekly rest of not less than 24 hours every six working days.

However, an employee, occasionally may be required to work additional hours upon need. The minimum premiums are set at 35% of the normal pay for overtime work during daylight and 70% for work at night-time; 100% for work performed on days off and holidays.

The working hours shall include a rest period of minimum one hour in total and one continuous working period shall not exceed five consecutive hours whilst the total work duration should not exceed 10 hours in total. In all cases, weekly rest shall be paid.

Annual Leave

Article 47 of the Labor Law stipulates that the duration of the employees' annual leave is 21 days per year provided they have worked one year for the employer. For employees who have worked for more than

10 years, serving one or more employers, annual leave is 30 days. Employees aged more than 50 years are also entitled to an annual leave of 30 days.

For employees employed less than a year and not less than 6 months, annual leave is pro-rated to the period of service.

Sick Leave

As stipulated in Article 54 of the Labor Law, in case of employee's sickness he/she is entitled to sick leave based on the report from concerned medical authority. According to Social Insurance Law, during the sick leave an employee is entitled to his/her salary. An employee with proven record of sickness is entitled to a paid sick leave at the rate of 75% of his/her salary upon which social insurance payments are calculated; for a period of 90 days, to be increased to 85% for the following 90 days. Sick leaves are payable up to 180 days. The right is reserved for the employee to benefit from his/her accumulated annual leaves as well as convert these into sick leaves if such a balance exists.

Maternity Leave

According to the 1996 Child Law, female employees covered by social insurance are entitled to three months of paid maternity leave for each up to three times, provided they have been contributing to the social insurance for the past 10 months. Maternity benefits are paid at 75% of the last wage. Moreover, women employed in establishments with more than 50 employees are entitled to up to two years of unpaid childbearing leave per child as stipulated in the Child Law.

Women are also entitled to two half-hour nursing breaks per day, or alternatively one combined an hour-long break, for 24 months after the date of birth of each child.

A woman preserves all her rights and benefits upon return to workplace from maternity leave.

Work Permit Requirements for Foreign Employees

Foreign employees are not permitted to work in Egypt unless Residency and Work Permits are obtained.

Discrimination and Equal Opportunities

Egyptian labor law includes non-discrimination clauses and complies with the International Labor Organization (ILO) conventions regulating the employment and training of women and eligible children (Egypt ratified ILO Convention 182 on combating the Worst Forms of Child Labor in April 2002). There are legal provisions that are meant to protect women against sexual harassment in the workplace.

However, there are some provisions that would not allow women to get engaged in certain types of jobs as men despite the fact that officially there is no discrimination based on gender. There is also no provision for equal pay for the same type of work that a man and a women would do. Considering those legislative limitations, there need to be clear provisions in different contracts under various components to ensure that women are given equal labor opportunities including in jobs and pay. This is particularly valid for the types of works under the project could be classified as jobs that are not appropriate for women.

4. BRIEF OVERVIEW OF NATIONAL LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

The main national laws addressing labor and working conditions are listed below:

- **Labor Law No. 12/2003:** It is the primary source of labor law. It regulates employment, labor relations and OSH in the private sector.
- **Law No. 48 of 1978:** it regulates employment in the civil sector
- **Law No. 18 of 2015** concerning the Civil Service: It regulates public sector employment including working conditions for civil servants; setting the retirement age for the sector; and setting out the wage structure for civil servants. It is the most recent law on Egypt's civil service, and its scope is assumed to be similar to Law No. 48 of 1978.
- **Law No. 148 of 2019** on social insurance pension system. The new unified program covers 26 categories of workers, including public- and private-sector employees, civil servants, and self-employed persons
- **Child Law no. 12 of 1996**, amended by Law no. 126 of 2008 and its executive regulation issued by decree no. 2075 of 2010. The Child Law is a general law for the protection of the rights of the child, introduced several amendments increasing the minimum age for children employment.
- **Decree No. 118 of 2003** concerning the employment of children in hazardous work. It sets forth a list of jobs for which children under the age of 18 shall not be employed. It does not exclude specific sectors as a whole or specific types of employment.
- **Decree No. 113 of 2003** regulates preparatory and complementary work which needs to be finished by workers before or after the end of work. Its scope is not specified in the law, however, since it is an executive decree of the Labor Law it is likely to have the same scope.
- **Decree 115 of 2003** determines the works that are intermittent by their nature and in which the worker may stay at the place of work more than 10 hours a day but maximum 12 hours a day. It covers work that is deemed intermittent by nature, including certain types of farming, transport (including land, air, and water), port work and shipping.
- **Law No. 83 of 2002** on Economic Zones of a Special Nature regulates employment relations, organization, and management in Economic Zones of a Special Nature. It sets out that in these zones, foreign nationals may only account for 25% of a firm's workforce.
- The Law on the Rights of Persons with Disabilities of 2018 regulates the social protection, training and the right to work of people with disabilities. Its specific scope is unclear.

The main national laws addressing OHS are listed below:

- **The 2003 Labor Law** devotes a specific section (Book V) to occupational safety and health and assurance of the adequacy of the working environment.
- **Decree No. 126 of 2003** defines procedures and forms for the notification of work-related accidents, injuries, fatalities, and diseases. It replaced Decree No. 75 (1993). Sets forth that

establishments must notify the authorities when accidents and diseases occur and provide statistics on workplace injuries, accidents, and diseases. Its scope is unclear.

- **Decree No. 211 of 2003** specified conditions and precautions essential for the provision of OSH measures at the workplace. It replaced Decree No.55 (1983). Its specific contents and scope are unclear.
- **Decree No. 134 of 2003** defines the committees for vocational safety and health and related OSH training institutions. Its specific contents and scope are unclear. However, since it is an executive decree of the Labor Law, it is likely to have the same scope.
- **Law 137/1981:** Labor and Workforce Safety.
- Minister of industry **Decree 91/1985** for implementing Law 2/1985.
- **Law 4/1994:** Articles 43 - 47 of its modified Executive Regulations by Decrees No. 1095/2011 and 710/2012 stipulate the provision of all necessary safety measures including protective equipment to work crew involved in construction activities. Annex 8 of the Regulations of Law no.4/1994 lists the maximum allowable limits for air contaminants within the working environment. Annex 7 of the Executive Regulations amended in 2012 of Law no.4/1994 stipulates the permissible limits for sound intensity and safe exposure times in workplaces. Article 44 of Law 4/1994 and Article 46 of its amended regulation 710/2012 stipulate conditions and requirements for temperature and humidity in the workplace. Annex 9 to the Regulations sets out the major and minor limits for temperature and humidity, exposure periods and safety precautions.

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5. RESPONSIBLE STAFF

The Project will employ Direct Workers for the PCU, which will be established at the MoE and will be in charge of the project's overall implementation and coordination between the national actors. It will ensure that the project is implemented in accordance with the project document. It will organize national meetings and workshops, conduct priority awareness and communication activities and oversee the implementation of the SEP. It will also be responsible for monitoring and evaluation (M&E) of project activities in coordination with four IUs:

- Air Quality Management IU
- SWM IU
- Vehicle Emissions IU
- Stakeholders Engagement and Awareness IU

The PCU and the IUs, will be established before effectiveness and will be maintained throughout the project's duration.

The PCU is committed as per the Environmental and Social Commitment Plan (ESCP) to assign dedicated staff, including a full-time environmental specialist, a full-time Social Development and Gender Specialist, and a full-time Communication Specialist. They shall be responsible for the following:

- Engagement, management and monitoring of labor and working conditions for direct Project workers in coordination with the human resources department at the relevant ministries and/or governorates;

- Supervising the reception, registration and correct processing of any complaints/grievances received from the different stakeholders;
- Monitoring the occupational health and safety (OHS) issues and performance across all sites and activities of the project.
- Orientation of all types of workers on the LMP
- Preparation of ToRs related to environmental and social assessments, infection prevention control and Medical Waste management plans
- Preparation and review of contract clauses for contractors.
- Monitoring the implementation of the ESMPs including infection control and medical waste management plans (MWMPs) and ensure correct implementation as per the WB requirements and national legislations by reviewing Contractor's EHS reports, conducting site visits where required
- Prepare and deliver reports on the ESMPs and EHS performance as required to Lending and/or regulatory institutions.
- Coordinating and leading awareness campaigns and capacity building needs;
- Coordinating with sub-contractors with regard to ESMP requirements;
- Responding to the results of internal and external (lenders or regulatory) monitoring visits/ inspections.

The Contractor/private sector operator will have to comply with the requirements of ESS2 which will be incorporated into contractual agreements. The Contractor has to pass the requirements to all his sub-contractors. The following represent a non-exhaustive list of their responsibilities under these LMP:

- Execute any sanctions as a result of possible noncompliance with E&S provisions;
- Facilitate periodic audits, inspections, and/or spot checks of project locations or work sites and/or of labor management records and reports conducted by the PCU and/or third parties;
- Facilitate and accept sharing and disclosure of information
- Implement COVID-19 specific measures according to contractual agreements.

The Engineering and Supervising Consultant will be responsible for:

- Supervision and monitoring the implementation of the requirements of these LMP
- Identify any noncompliance with E&S provisions
- Conduct periodic audits and inspections

6. POLICIES AND PROCEDURES

The Project's identified risks and impacts will be mitigating several policies and procedures. These will address OHS risks, working conditions and management of worker relationships, labor working conditions, non-discrimination and equal opportunities, terms, and conditions of employment. The different policies and procedure which the Project will prepare, adopt and implement are listed below.

Occupational Health & Safety (OHS)

All contractors, primary suppliers and private sector operators involved with the Project (Components 2 and 3 in specific) shall prepare, adopt, and implement an OHS plan complying with national legal

requirements, General World Bank Environmental, Health and Safety Guidelines (EHSGs) and, as appropriate the industry-specific EHSGs as well as other [Good International Industry Practice \(GIIP\)](#). This will be reflected in the design requirements for the different Project components, clear and specific clauses in the contracts as well as in all ToRs developed for the Project throughout the implementation period. The OHS plan shall be approved by the PMU prior to the start of the relevant activities. The OHS plan to be developed by the different parties shall cover the following:

- Identification of all potential hazards affecting the physical, mental, and social well-being of project workers in all occupations, with focus on life threatening hazards.
- Provision of appropriate measures to prevent and protect against the potential hazards, including modifying, substituting, or eliminating the hazard sources. These include adequate personal protective equipment at no cost to project workers; adequate first aid facilities; hazard labelling in both Arabic and English languages.
- Developing and implementing an Emergency Prevention and Preparedness and Response arrangements to emergency situations.
- Provision of remedies for adverse impacts such as occupational injuries, deaths, disability and disease.
- Putting in places processes which enable project workers to report work situations that they believe are not safe or healthy.

All contractors and private operators shall hire a full-time accredited OHS professionals at each of the construction sites. Records shall be kept and shared with the PMU on OHS performance at all sites, and all work-related accidents, illnesses, and all other incidents will be formally reported and documented.

Contractors should also develop specific procedures or plans so that adequate precautions are in place to prevent or minimize an outbreak of COVID-19, and it is clear what should be done if a worker gets sick. These measures include but are not limited to:

- Assessing the characteristics of the workforce, including those with underlying health issues or who may be otherwise at risk
- Confirming workers are fit for work, to include temperature testing and refusing entry to sick workers
- Considering ways to minimize entry/exit to site or the workplace, and limiting contact between workers and the community/general public
- Training workers on hygiene and other preventative measures, and implementing a communication strategy for regular updates on COVID-19 related issues and the status of affected workers
- Treatment of workers who are or should be self-isolating and/or are displaying symptoms
- Assessing risks to continuity of supplies of medicine, water, fuel, food, and PPE, considering international, national, and local supply chains
- Reduction, storage, and disposal of medical waste
- Adjustments to work practices, to reduce the number of workers and increase social distancing

- Expanding health facilities on-site compared to usual levels, developing relationships with local health care facilities and organize for the treatment of sick workers
- Establishing a procedure to follow if a worker becomes sick (following WHO guidelines)
- Implementing a communication strategy with the community, community leaders and local government in relation to COVID-19 issues on the site.

Labor influx

It is likely that impacts related to labor influx will be relevant in the project candidate areas. Temporary Labor Influx might result in unfavorable impacts on the project candidate areas in terms of:

- Influx of additional population, Increased pressure on accommodation and rents²
- Increased risk of communicable diseases and burden on local health services
- Increased risk of illicit behavior and crime
- Potential Gender Based Violence (GBV) and Sexual Exploitation and Abuse (SEA). As per the WB 2016 Labor Influx Guidance Note, the scale of labor influx and the absorptive capacity of the local community indicate the significance of the anticipated risk of GBV. The project can lead to an increased risk of Gender Based Violence, as women are particularly vulnerable within the context of construction projects. Gender based violence can be manifested through multiple behaviors including Sexual harassment of women and girls or Exploitative sexual relations and unpaid work, or low wages.

The project will adopt mitigation measures including requirements for the contractors to develop and sign a code of conduct. It will include prevention of sexual exploitation and abuse and sexual harassment (SEA/SH) at workplace, and accommodation of workers in the case of presence with local communities. In addition to that, the following will be thoroughly implemented:

- Apply the full requirements related to operating the project grievance mechanism including anonymous channels
- Raising awareness of the local community about the project commitment towards communities' and the measures taken for that through public consultation and focus group discussions
- Conduct random drug and alcohol tests.
- Codes of conduct to be developed, signed by all workers, and a penalty system to be put in place for all non-compliance including cases where workers will be staying in rented apartments by the contractor or sub-contractor.

Terms and conditions of employment

Wages and working hours

² At this stage of the project, it is not possible to get clear and final information about where the workers will reside, location and size of the labor camps, in case they will be needed. At a later stage, this information will become clearer and labor camps will be managed according to the principles of this LMP and the other relevant ESF documents.

All Direct Workers will be provided with clear and understandable terms and conditions of employment. For the Contracted and Primary Supply workers, clauses will be included in the all-project procurement documents to ensure that terms and conditions of employment are being provided according to the requirements of ESS2 and/or national law. This includes providing them with signed contracts stating clearly the duration of the contract, leave entitlements, conditions of contract termination including receiving written notices of termination, disciplinary procedures that are applicable, housing and accommodation provisions and allowance where applicable, food and payment, their rights related to hours of work, fair wages, overtime, compensation, benefits as stated in the national law as well as those arising from the requirements of ESS2.

Monitoring systems will be put in place to ensure that all types of Project workers will be properly paid on a regular basis and compensated for longer working hours and certain shifts which may need to be paid at a higher hourly rate as per applicable legislation (e.g., night shifts). Workers will be presented with details of grievance procedures, including the person to whom grievances should be addressed (refer to section 9 for details about the workers' grievance, and mechanisms which will be adopted)

The Project is expected to deal with contracted and supplied workers who may not be capable of reading and/or may have difficulties understanding the employment documentation. The project will therefore ensure that working conditions and terms of employment are orally communicated and explained. For the migrant domestic workers, who are also expected as part of the Contracted and Primary Supply workers, the project will ensure that the working conditions and terms of employment are the same or substantially equivalent to those of non-migrant workers (when performing the same type of work).

Forced labor, refers to any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. These practices will be prohibited and will not be used in connection with the project. This prohibition covers any kind of involuntary or compulsory labor. If forced labor is discovered in the project's workforce, prompt action will be taken to address the practice that has coerced the worker and not recreate conditions of coercion. Any cases of forced labor discovered in the project's workforce are referred to relevant government authorities and support services, as appropriate, to be addressed in accordance with national law. These may include bonded labor (work in satisfaction of a debt of an amount that would be difficult or impossible to pay off), excessive limitations on freedom of movement, excessive notice periods, retaining the worker's identity and other government-issued documents (such as passports) or personal belongings, imposition of recruitment or employment fees payable by the worker at the commencement of employment, loss or delay of wages that impede the workers' right to end employment within their legal rights, substantial or inappropriate fines, physical punishment, use of security or other personnel to force or extract work from project workers, or other restrictions that compel a project worker to work on a non-voluntary basis.

Freedom of Association and Collective Bargaining

The rights of workers and the role of unions will be respected and the right to enter free and voluntary collective bargaining arrangements with management is respected.

Equal Opportunity and Non-Discrimination

As previously mentioned, the project will implement GIIP relating to labor standards and working conditions (in line with ILO Core Conventions) and national law. This particularly applies to equal opportunities and non-discrimination. The employment of Project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship including but not limited to: recruitment requirements; training opportunities; termination of employment; inappropriate treatment or harassment including sexual harassment. Where disabled persons are hired (higher probability will be among Direct Workers), accessibility will be ensured in terms of provision of wheelchair ramps or elevators, or alternative formats of communication, etc.).

Men and women will be given equal opportunities relating to all recruitment opportunities under the project. This will apply to hiring of all project workers. The workforce grievance mechanism (GM) will be communicated to all workers as detailed in section 9 and will be used for non-compliance monitoring.

The project will also provide all measures necessary for protecting vulnerable groups of workers such as the disabled, women and migrant workers. As mentioned above, the code of conduct will be developed which should also include provisions on Sexual and gender-based violence (GBV) and safety. Induction trainings and refresher trainings will be provided for all workers as detailed below.

Training and Capacity Building

Training will be provided to all workers on general (and specific) OHS during induction and on a regular basis to ensure all workers are well capacitated with the project's OHS requirements. The PMUs Health and Safety Officers will provide training to Direct Workers, while training will be provided to Contracted and Primary Supply Workers through Third Parties. Training will include but will not be limited to work at heights; electrical and vehicular safety; handling of hazardous materials, use of PPE, hazard avoidance and reduction measures, use of first aid and rescue techniques, emergency prevention and preparedness and response arrangements to emergency situations, and firefighting

Additional training sessions for different targeted workers will include the following:

- Awareness of the requirements of this LMP and associated plans/procedures;
- Code of conduct, Gender-based violence and SEA;
- Grievance mechanism, including roles, responsibilities, and accountabilities, and contact persons/communication channels.
- E&S instruments as relevant including the implementation of the different ESMPs and e-waste management plans.

Training shall be delivered by experienced trainers, based on the competency requirements. Records of the training will be kept including training evaluation.

7. AGE OF EMPLOYMENT

- The minimum age for employment on the project is 18 due to the hazardous nature of the work, particularly under components 2 and 3.
- All workers will have written contracts compliant with the national labor law and receive pre job briefing of their rights under the national law, including wages, pay, overtime etc.

Process of age verification

In order to prevent engagement of under-aged labor, all contracts with work contractors shall have contractual provisions to comply with the minimum age requirements including penalties for non-compliance, and it will be well communicated to all potential stakeholders including the local community where the unskilled workforce will be sourced. The contractor is required to maintain labor registry of all contracted workers with age information. Verification of the age shall be undertaken prior to the engagement of labor and be documented. Below is indicative age verification means that could be used in the context where official ID system is unavailable:

- Check the birthday on official documents such as birth certificate, national ID or other credible records, where available;
- Obtain written confirmation from the medical practitioner;
- Obtain written and signed declaration from the worker and his/her parents or guardian; or
- Inquire with the local community leader, community action group or with other credible community sources.

8. TERMS AND CONDITIONS

The project will have Direct, Contracted and Primary Supply Workers. The Terms and Conditions for each of them are described below.

Terms and Conditions for Direct Workers

- **Maximum number of hours that can be worked on the project**
The project will commit to the provisions of the Labor Law and accordingly allow a maximum working hours per day that are 8 hours, or 48 hours per week. The minimum premiums are set at 35% of the normal pay for overtime work during daylight and 70% for work at night-time; 100% for work performed on days off and holidays.
- **Provisions on termination**
Project workers will receive written notice of termination of employment and details of severance payments in a timely manner. All wages that have been earned, social security benefits, pension contributions and any other entitlements will be paid on or before termination of the working relationship, either directly to the project workers or where appropriate, for the benefit of the project workers. Where payments are made for the benefit of project workers, project workers will be provided with evidence of such payments.

- **Annual leave**

The duration of the employees' annual leave will be 21 days per year, provided they have worked one year for the employer. For employees who have worked for more than 10 years, serving one or more employers, annual leave will be 30 days. Employees aged more than 50 years are also entitled to an annual leave of 30 days. For employees employed less than a year and not less than 6 months, annual leave is pro-rated to the period of service

- **Maternity leave**

Female employees covered by social insurance are entitled to three months of paid maternity leave for each up to three times, provided they have been contributing to the social insurance for the past 10 months. Maternity benefits are paid at 75% of the last wage. Moreover, women employed in establishments with more than 50 employees will be entitled to up to two years of unpaid childbearing leave per child.

Women will be also entitled to two half-hour nursing breaks per day, or alternatively one combined an hour-long break, for 24 months after the date of birth of each child. Women will preserve their rights and benefits upon return to workplace from maternity leave.

- **Rest per week**

Workers shall receive a weekly rest of not less than 24 hours every six working days. The working hours shall include a rest period of minimum one hour in total and one continuous working period shall not exceed five consecutive hours whilst the total work duration should not exceed 10 hours in total. In all cases, weekly and daily rests are paid.

- **Sick leave, injuries, and death**

The employee is entitled to a sick leave based on a report from concerned medical authority. During the sick leave an employee is entitled to his/her salary. An employee with proven record of sickness is entitled to a paid sick leave at the rate of 75% of his/her salary upon which social insurance payments are calculated; for a period of 90 days, to be increased to 85% for the following 90 days. Sick leaves are payable up to 180 days. The right is reserved for the employee to benefit from his/her accumulated annual leaves as well as convert these into sick leaves if such a balance exists.

Pregnant women will be re-assigned and allowed to work in non-hazardous, non-arduous work as per medical advice without pay severance or penalty.

It is the contractor's responsibility that all workers, including temporary and daily laborers, shall be appropriately insured against injuries and death.

- **Compensation related to workplace injury and accidents:**

The Project should at least comply with all the requirements of the Egyptian Labor Law in the cases of work-related injuries and accidents. All employees should be covered by social insurance to ensure their eligibility for a workplace injury benefit as stipulated in the Law. Definition in the Law in terms of temporary disabilities, permanent disabilities partial disabilities should be complied to.

Terms and Conditions for Contracted Workers

- **Specific wages, hours and other provisions that apply to the project**

The provisions of the labor law will be implemented as a minimum reference. Accordingly, the minimum wage will be 2,000 Egyptian pounds (EGP).

- **Maximum number of hours that can be worked on the project**

The project will commit to the provisions of the Labor Law and accordingly allow a maximum working hours per day that are 8 hours, or 48 hours per week. The minimum premiums are set at 35% of the normal pay for overtime work during daylight and 70% for work at night-time; 100% for work performed on days off and holidays.

- **Provisions on termination**

Project workers will receive written notice of termination of employment and details of severance payments in a timely manner. All wages that have been earned, social security benefits, pension contributions and any other entitlements will be paid on or before termination of the working relationship, either directly to the project workers or where appropriate, for the benefit of the project workers. Where payments are made for the benefit of project workers, project workers will be provided with evidence of such payments.

- **Annual leave**

The duration of the employees' annual leave will be 21 days per year, provided they have worked one year for the employer. For employees who have worked for more than 10 years, serving one or more employers, annual leave will be 30 days. Employees aged more than 50 years are also entitled to an annual leave of 30 days. For employees employed less than a year and not less than 6 months, annual leave is pro-rated to the period of service.

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Female employees covered by social insurance are entitled to three months of paid maternity leave for each up to three times, provided they have been contributing to the social insurance for the past 10 months. Maternity benefits are paid at 75% of the last wage. Moreover, women employed in establishments with more than 50 employees will be entitled to up to two years of unpaid childbearing leave per child.

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- **Compensation related to workplace injury and accidents:**

The Project should at least comply with all the requirements of the Egyptian Labor Law in the cases of work-related injuries and accidents. All employees should be covered by social insurance to ensure their eligibility for a workplace injury benefit as stipulated in the Law. Definition in the Law in terms of temporary disabilities, permanent disabilities partial disabilities should be complied to.

9. GRIEVANCE MECHANISM

A well-communicated and easily accessible grievance mechanism will be provided for all Direct and Contracted Project Workers to raise workplace concerns related to recruitment process and/or workplace conditions. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. The PMU is responsible for managing direct workers' grievances, while the contractor for contracted workers.

The workplace grievance mechanism will be designed to be easily understandable, clear, and transparent and to provide timely feedback. The policy of confidentiality and non-retribution will be reinforced, along with ability to raise anonymous grievances.

The mechanism will include multiple communication channels dedicated for workplace complaints only, including but not limited to an email address/website link; phone number; and a physical address for handing the complaints and grievances in person. Workers will have the freedom to pick the one they are comfortable using. The exact design will be finalized and will be disseminated prior to the launch of any contracts signatures and all contractors will be aware that those are systems related to the project that they need to comply to.

The workplace grievance mechanism will not impede access to other judicial or administrative remedies that are available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

Procedures

Workers will be encouraged to discuss their grievance and complaint informally with their direct managers. In cases where the direct manager is related to the subject of the complaint, the employee would most probably choose to directly submit a formal grievance. For all cases where the employees decide to submit a formal grievance, the following provides details about the step-step procedure they will be using:

1- Receipt, acknowledgment, and registration

- The worker will submit the grievance through one of the dedicated channels indicated above.
- The worker will be requested to use to the extent possible a grievance template which will be shared with all workers in hard/soft copies /available to download from the website.
- If the worker wishes to submit the grievance orally via phone or in person, the project staff will lodge the complaint on their behalf, and it will be processed through the same channels.

- Under request of the plaintiff, grievances can be lodged anonymously. This option shall be made clear to the complainant in the Grievance template and/or in cases of oral submissions.
- In case of anonymity opt-out, the worker will provide contact details or any other suitable means for him/her to be updated on the status of their complaints/grievances.
- All received grievances shall be logged into the workplace grievance log.
- In all cases, the staff in charge should provide a timely communication back to the complainant(s) that their grievance has been received, will be logged, and reviewed for eligibility and provide them with the registration number. Clear and announced standards for the time frame of the response should be established, announced, and adhered to.

2- Grievance verification and assessment

- In order to verify the grievance, it should be discussed with the worker, investigated and evidence gathered to the extent possible. This should include field inspections if needed to conduct interviews and gather information about the incident or the case.
- The GM staff will need to decide with regards to the eligibility of the grievance or whether it should be directed to other mechanisms such as the project GRM. The following represents the proposed eligibility criteria:
 - Is the complainant one of the project's workers: direct; contracted or primary supply workers?
 - Is the complaint related to one of the following OHS and/or worker and labor conditions: 1- OHS; 2- Forced labor; 3- Child Labor; 4- Social insurance; 5- wages and working hours; 6- discrimination and unequal opportunities; 7- Freedom of association and collective bargaining?
 - Is the complaint not related to any of the above categories but still related to labor and working conditions?
 - If the complaint is related to gender-based violence or sexual abuse and exploitation and in addition to the mentioned prevention mechanisms (e.g. the Code of Conduct) a GBV sensitive mechanism that is dealt with in strict confidentiality should be in place including:
 - Apply the full requirements related to operating the project grievance mechanism including anonymous channels.
 - Establish referral systems to the credible and authorized service providers (e.g. National Council for Women).
 - Apply the principles of the [Good Practice Note](#) in terms of following a survivor centered approach.

3- Response and Feedback

- **As an initial response**, the complainant will be informed with the eligibility results as well as all the steps being taken to address his concerns. This initial response shall be provided via a formal letter; an email; or a phone call within 5 working days from the date of receipt of the grievance.
- **For eligible and straightforward grievances**, GM staff will provide a response without further investigation within 10 days from the initial date of receipt of the grievance, where actions are proposed to resolve the complaint and agreement on the response is sought with the complainant.

- **For eligible grievances that require further assessment**, GM staff will further engage with the complainant via a phone call or a formal meeting to collect further information. Based on this, they will provide within 14 days from the initial date of receipt of the grievance, where actions are proposed to resolve the complaint and agreement on the response is sought with the complainant.
- Imminent and serious safety risks reported by the worker will be addressed immediately and will not follow the normal timeline.

- In all the above-mentioned scenarios, the response should include a clear explanation of the proposed response including any alternative options, while clarifying to the extent possible the rights of the complainant, and the choices he has including: 1- to agree to proceed; 2- request for a second round of assessment; 3- to consider any other organizational, judicial or non-judicial possibilities.
- In case the grievance feedback is satisfactory to the complainant, the response should be implemented and recorded in the grievance log with the date of grievance resolution.
- In case the grievance feedback is not satisfactory to the complainant, he/she has the right to appeal within five (05) working days. In such case, a second tier should be initiated where the GRM staff will attempt to propose alternative options and carry out additional investigation in to meet the concerns of the complainant, and other stakeholders. The complainant will be invited to attend an appeal meeting or to discuss the appeal over a pre-scheduled phone call, during the first three days following the appeal. It will be preferred that a more senior staff attend/discuss the appeal with the employee. Where needed, a grievance committee might be established representing different sectors as relevant to the complaint, in addition to worker representative(s) (upon the complainant consent) to help achieve a transparent process. The GM staff should send their response within seven (07) days from the date of the appeal. The second-tier response should also include a clear explanation of the proposed response including all alternative options and the choices the complainant has as described above.

4- Agreement and implementation of the response

- If the grievance has been resolved, the GM staff will document the actions taken, time it took to resolve the grievance and satisfactory resolution.
- If the grievance has not been resolved, GM staff should document additional information including actions taken, communication with the complainant, and the final decisions made by the complainant and the organization with regards to any other alternatives.
- In general, confidentiality should be maintained in GRM documentation, if the complainant has requested so.
- In all cases, the total number of grievances should be recorded including time it took to resolve them, as well as the number of unresolved cases.

10. CONTRACTOR MANAGEMENT

The contractors will be selected based on both minimum technical specifications and financial offers. The technical specifications will ensure that they shall have in place labor management procedures including OHS issues applicable to the project that will allow them to operate in accordance with the requirements of ESS2.

Requirements of ESS2 will be incorporated into contractual agreements with all contractors and sub-contractors and procedures will be put in place to manage and monitor the performance of contractors. The contractual agreements will include non-compliance remedies (i.e., sanction clause) for

possible noncompliance with E&S provisions by the contractor. The EES2 requirements will include periodic audits, inspections, and/or spot checks of project locations or work sites and/or of labor management records and reports compiled by third parties. Third parties' labor management records and reports may include: (a) a representative sample of employment contracts or arrangements between third parties and contracted workers; (b) records relating to grievances received and their resolution; (c) reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions; (d) records relating to incidents of non-compliance with national law; and (e) records of training provided for contracted workers to explain labor and working conditions and OHS for the project. COVID-19 specific measures shall also be incorporated into contractual agreements, including but are not limited to:

- Provision of medical insurance covering treatment for COVID-19, sick pay leave for workers who either contract the virus or are required to self-isolate due to close contact with infected workers and payment in the event of death
- Specific procedures relating to the workplace and the conduct of the work (e.g., creating at least 6 feet between workers by staging/staggering work, respecting hygienic conditions in the workplace, limiting the number of workers present)
- Specific procedures and measures dealing with specific risks. For example, for health care contractors: infection prevention and control (IPC) strategies, health workers exposure risk assessment and management, developing an emergency response plan, per [WHO Guidelines](#)
- Appointing a COVID-19 focal point with responsibility for monitoring and reporting on COVID-19 issues, and liaising with other relevant parties
- Including contractual provisions and procedures for managing and monitoring the performance of contractors, considering changes in circumstances prompted by COVID-19

11. TERMS AND CONDITIONS FOR PRIMARY SUPPLY WORKERS

The requirements under ESS2 for primary suppliers are related to risks of child labor, forced labor and serious safety risks. When sourcing [construction materials] from primary suppliers, the contractor will require such suppliers to identify the risk of child labor/forced labor and serious safety risks in producing the [construction materials]. The PMU and the engineering and supervision consultants will review and approve the purchase of primary supplies from the suppliers following such risk identification/assessment and any other relevant due diligence (such as the review of license for quarries). Where appropriate, the contractor will be required to include specific requirements on child labor/forced labor and work safety issues in all purchase orders and contracts with primary suppliers.

If child labor/forced labor and/or serious safety incidents are identified in relation to primary supply workers under the project, the PMU and the engineering and supervision consultant will require the primary supplier to take appropriate steps to remedy them. Such mitigation measures will be monitored periodically to ascertain their effectiveness. Where the mitigation measures are found to be ineffective, the PMU and the engineering and supervision consultant will, within

reasonable period, shift the project's primary suppliers to suppliers that can demonstrate that they are meeting the relevant requirements.

ANNEXES

I. Abbreviations and Acronyms

CTA	Cairo Transport Authority
C&D	Construction & Demolition
EEAA	Egyptian Environmental Affairs Agency
EGP	Egyptian pounds
EHS	World Bank Environmental, Health and Safety Guidelines
EPR	Extended Producer Responsibility
GBV	Gender Based Violence
GIIP	Good International Industry Practice
GC	Greater Cairo
GM	Grievance mechanism
HCW	Health Care Waste
IPC	Infection prevention and control
IVA	Independent Verification Agent
MoE	Ministry of Environment
MoLD	Ministry of Local Development
MoT	Ministry of Transport
SEA	Sexual Exploitation and Abuse
SGBV	Sexual and gender-based violence
SH	Sexual Harassment
SWM	Solid Waste Management
uPOPs	Unintentionally Persistent Organic Pollutants
WMRA	Waste Management Regulatory Authority

II. Code of Conduct Template

Code of Conduct

Template

Message from the Top Management

Include a message about the company's commitment to ethics and the importance of the code of conduct.

Introduction

Provide information on how to use the code of conduct.

For example:

- *Who does it apply to?*
- *Does this code apply to contractors and primary supply workers as well?*

Ethical Principles and Core Values

Provide an explanation of the company's core beliefs and values.

For example:

- *Honesty*
- *Integrity*
- *Trustworthiness*
- *Respect for others*
- *Accountability*
- *Obedience to the law*
- *Empathy*
- *Teamwork*

Grievance Redress Mechanism (GRM)

In this section, insert the Worker GRM, in addition to clearly indicate the contact numbers and communication channels, example:

To report a concern:

- *Talk to your manager*

LABOR MANAGEMENT PROCEDURES

- Website:
- E-mail:
- Phone number:
- Address:

Outline the company's non-retaliation policy and the commitment of everyone to ensuring there is no retaliation for reporting concerns of any kind. State the company's position on punishment for retaliatory behavior. Make sure that the meaning of retaliation is clearly explained.

For example:

Workers who report a concern in good faith cannot be subjected to any adverse employment action including:

- *Unfair dismissal or suspension*
- *Unfair denial of a promotion or other employment benefit*
- *Bullying and harassment, either in person or online*
- *Any other behavior that singles out the person unfairly*

Non-discrimination and Equal Opportunity

Outline the company's non-discrimination commitment to a diverse workforce.

For example:

The company will not tolerate discrimination based on race, color, religion, gender, age, national origin, marital status, or disability.

Gender Based Violence (GBV) and Harassment

Explain the company's zero tolerance policy on Gender Based Violence (GBV), Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) at workplace

For example:

Treat all fellow employees, customers, business partners and other stakeholders with dignity and respect always.

Any type of harassment, including physical, sexual, verbal, or other, is prohibited and can result in disciplinary action up to, and including, termination.

Harassment can include actions, language, written words, or objects that create an intimidating or hostile work environment, such as:

- *Yelling at or humiliating someone*
- *Physical violence or intimidation*
- *Unwanted sexual advances, invitations, or comments*
- *Physical conduct including assault or unwanted touching*

Community Health and Safety

Outline the company's commitment to protecting the health & safety of the surrounding communities
For example:

The company conducts business in a way that will not cause any harm to affect the privacy and safety, health, comfort and security of the communities. you should always adopt the following measures:

- *Report potentially vulnerable residents;*
- *Be polite and courteous at all times;*
- *Minimize noise, disruption and inconvenience to residents;*
- *Respect and respond appropriately to residents' culture;*
- *Make sure there are no trip hazards, such as electrical cables – especially if there are small children or people with limited mobility nearby;*
- *Adhere to our Health and Safety Code of Practice at all times.*

YOU MUST NOT:

- *Use offensive language, or engage in loud or boisterous behavior;*
- *Comment on the property, the residents or their lifestyles;*
- *Interfere with or mistreat residents' animals or pets;*
- *Block private or common driveways, access paths, crossings, residents' parking areas or vehicles, without prior permission and not for longer than necessary;*
- *Enter or remain in occupied premises if the resident is not present, without prior permission from the resident;*
- *Smoke close to surrounding communities, consume alcohol, use prohibited substances or carry out work while under their influence;*
- *Leave dangerous items, such as electrical wires, exposed;*
- *Remain calm and polite in situations of disputes and refer any problems to us. Please call*

Occupational Health and Safety

Outline the company's commitment to providing employees with a safe and healthy workplace.
For example:

The company conducts business in accordance with applicable health and safety requirements and strives for continuous improvement in its health and safety policies and procedures.

All employees are expected to perform their work in compliance with applicable health and safety laws, regulations, policies, and procedures and always apply safe work practices in all locations.

Applicable safety and health requirements must be communicated to visitors, customers, or contractors at any company location.

Employees are required to immediately report workplace injuries, illnesses, or unsafe conditions, including "near-misses."

Conduct random drug and alcohol tests.

Environment

Outline the company's commitment to minimizing the environmental impact of all its activities used to deliver services to its customers.

For example:

The company is committed to operating in an environmentally responsible manner, from the provision of products and services to the operation of its offices and facilities, selection of suppliers and other business activities.

The company complies with all applicable environmental laws and regulations as well as self-directed commitments to sustainable practices and environmental protection.

Social Risk Management

Outline the company's goals and commitment to corporate social responsibility and describe what it does to achieve these.

For example:

The company understands that social responsibility extends to our entire supply chain. This encompasses not only the products and services supplied but also the human rights, ethics and social practices of our company and its suppliers.

Forced Labor: The company and its suppliers shall employ all employees under their own free will with no one being subjected to bonded or forced labor. This policy applies to not only the supplier's business operations but also those of their supplier network with which the company conducts its business.

Child Labor: The company and its suppliers shall not employ any people under the minimum legal working age of the country in which they work.

Code of Conduct Acknowledgement

By certifying to the company code of conduct, you acknowledge that:

For example:

- *You have read the entire code of conduct and understand your responsibilities related to it.*
- *You have had the opportunity to ask questions to clarify any unclear aspects of the code.*
- *You agree to abide by its principles.*
- *You agree to report to the company any violations of the code.*
- *You agree to cooperate in any investigations of violations of the code.*