

Eswatini Electricity Company



LABOUR MANAGEMENT PROCEDURES

For the proposed

Network Reinforcement and Access Project

Project ID no: P166170

Date: 19 April 2019

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Introduction

The Labor Management Procedures (LMP) was developed by Eswatini Electricity Company (EEC) to manage risks under the Eswatini Shiselweni Network Reinforcement and Access Project (Project) funded by the World Bank. The LMP sets out the Project's approach to meeting national requirements as well as the objectives of the World Bank's Environmental and Social Framework, specifically objectives of Environmental and Social Standard 2: Labor and Working Conditions (ESS2) and Standard 4: Community Health and Safety (ESS4). The national requirements and World Bank objectives are compared in the table provided in Appendix 1.

The Project's Environmental and Social Assessment identified key risks and impact associated with Project implementation, associated with workers as well as community health and safety, and the risk associated with labor impact. The World Bank has rated the overall project moderate which indicate a moderate likelihood of adverse impacts associated with Project implementation. The moderate rating indicates that the risks are well understood and expected to have limited impact as they can largely be avoided, minimized or managed through procedures, including procedures set out in this LMP. However, EEC is committed to, on a continuous basis, throughout the Project, evaluate risks and impact to have in place adequate measures and procedures to manage adverse impacts. The focus of the LMP is on workers engaged by contractors engaged by EEC for works on the transmission line (component 1a), distribution (component 1b) and connections (component 2). Adhering to these procedures, Project contractors will be required to prepare a Labor Management Plan for larger works. For smaller contracts, EEC may prepare specific procedures to be inserted in the contract as part of contractors' legal obligations. The approach will be assessed as part of the initial screening of environmental and social risk and impact carried out by EEC's Project Management Unit.

1. OVERVIEW OF LABOR USE ON THE PROJECT

The LMP applies in to all Project workers whether full-time, part-time, temporary, seasonal or migrant workers. The LMP is applicable, as per ESS2 to the Project in the following manner:¹

1. People employed or engaged directly by EEC to work specifically in relation to the Project;²
2. People employed or engaged by contractors to perform work related to core function of the project, regardless of location;
3. People employed or engaged by EEC's primary suppliers (see section 12).

1.1 Labor Requirements: EEC

EEC has established a Project Management Unit to oversee the Project. The Unit will engage, throughout the Project the following personnel:

- Project Manager – Joseph Ncwane

¹ The project will not engage community labor or security forces. Government civil servants, who may provide support to the Project, will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement.

² EEC staff, including Project staff and consultants, will remain subject to the terms and conditions of currently in place at EEC. These conditions are outlined in the LMP.

- Procurement Specialist – to be recruited
- Subs and Transmission Engineer - to be appointed
- Rural Elec Engineer - Ziyane Bhekumusa
- Environmental Officer - Constance van Zuydam
- Social Standards Officer - to be recruit
- Financial Management Specialist - Collie Dlamini

Additional staffing may be needed during Project implementation. However, EEC has a number of existing staffs who will provide support to the Project. The following offices have been identified:

- GIS Office: the surveyors have developed a number of transmission routing options and identified tentative resettlement impact. It is expected that the office will continue to lend support to the Project Management Unit’s Social Officer in regard to the resettlement process.
- Environmental office: oversaw preparation of environmental instruments and will lend support to the Project Management Unit’s Environmental Officer during implementation.
- Legal office: the legal office will oversee contractual issues.
- Outsourcing Office: will lend support in regard to contracting during Project implementation.
- Commercial Services: inspects primary suppliers twice annually and will report to Project Management Unit any irregularities.

1.2 Labor Requirements: Transmission Line and Substations (Component 1a)

Based on prior experience, EEC estimates that 100 workers are required under component 1a of the Project: app. 87km transmission line and required substations. At least half of this labor requirement can be sourced in Eswatini, but the specific number is subject to discussion, the labor requirement will form part of the Request for Proposal (RfP). EEC’s RfP will specify a preference for local labor from the communities that fall along the transmission line which are identified in the Stakeholder Engagement Plan. The works may include several contracts, exact procurement approach is yet to be determined. The following labor requirement is estimated at appraisal:

Transmission Line Team (49):

- 5 professionals (engineer, project manager, construction manager, site supervisor(s))
- 4 crane-tractor-loader-backhoe Operators
- 8 linesmen
- 5 stringer gear operators
- 1 safety officer
- 5 stringing gear operators
- 1 safety Officer
- 26 manual laborers

Substation Team (27):

- 5 professionals (engineer, project manager, construction manager, site supervisor(s))
- 15 technicians
- 7 semi-skilled laborers

Civil Contractor (24):

- 8 professionals
- 6 technicians
- 10 manual laborers

The construction of the transmission line and substations is expected to be completed within 18 months. While the Project is estimated to require 100 workers during that period, there will not be 100 workers on site at any time. Depending on the specific task there may be 10-75 persons at the Project site at any time. For example, linesmen are required only during the stringing – the specific machine operators are only required during the erection of the towers.

The Contractors will be required to recruit particularly the laborers from the identified communities, through the Chiefdoms or Tinkhundla Centers identified in the SEP.

1.3 Labor Requirements: Distribution and Connections (Component 1b and 2)

The upgrades in the distribution network and new connections are expected to benefit 8,000 households. The works is carried out by contractors who may have one or more teams of 12 persons. EEC estimates that as many as 30 teams may be required through the duration of the Project, which requires a total of 600 workers. However, at no time will 600 persons be working under the Project. It is anticipated that no more than eight (8) teams will be working at any point in time for a total of 96 persons. The teams are contractually obligated to meet the following requirements:

- 1 team leader
- 1 electrician
- 1 first aider/safety representative
- 3 linesmen
- 6 manual laborers

2. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

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

Labor influx. While a substantial number of jobs will be created as part of the transmission line upgrade (component 1a), distribution and new supply connections (component 1b and 2), it is not expected that the Shiselweni area will experience substantial labor influx. EEC's existing operational procedure is to mandate and localize the economic benefits and only allow for outside, including expatriate labor, where there is a requirement for special skills. External workers, which will be few in numbers, will be accommodated at existing housing in the area which has been prior practice by EEC in similar projects. There will be no dedicated camps established for worker accommodation in the project.

Specific requirements to manage risks associated with labor influx, related to interaction between project workers and local communities, such as communicable diseases and gender-based violence, are managed through contractual requirements, code of conduct and training set out in this

document. These procedures are guided by national legislation. The prevalence of Gender-Based Violence is high in Eswatini: nearly 50% of all women experience some form of GBV in their life time, the majority (1 in 3) before the age of 18. Eswatini also has one of the highest adult HIV/AIDS prevalence rates globally (27.4% in 2017).

Occupational health and safety. The risk related to the transmission and distribution lines is associated with the risk of falling from height when stringing and installation of transmission towers or poles used for distribution. There could also be a risk of electrocution during testing and charging phase. EEC has existing corporate requirements for contractor training and safety, records of which are inspected monthly and audited bi-annually.

3. OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

There are three main legislations in Eswatini which regulate the terms and conditions of employment in Eswatini namely; **The Employment Act 5, 1980, The Industrial Relations Act 2000 (as amended)** and the **Wages Act 16, 1964**.

The Employment Act provides for the basic conditions of employment with a view of improving the status of employees in Eswatini. The Act makes it mandatory for employers to furnish employees with written particulars of employment stating, hours of work, wages, leave entitlements, job description, grievance procedure, benefits if any etc. It further mandates the Ministry responsible to issue Wages Regulations on a regular basis which deals with worker's terms and conditions of each particular industry. It is in this legislation where you will find provisions regulating;

- Contracts of employment
- Leave entitlements, i.e. annual leave, sick leave, maternity leave and compassionate leave
- The protection of wages (prohibition against unlawful deductions)
- Retrenchment procedures
- Fair and unfair reasons for termination of employment

The Industrial Relations Act 2000 (as amended) on the other hand is the main Act which provides for the collective negotiation of terms and conditions of employment in the workplace (i.e. negotiations between employers and trade unions and the dispute resolution mechanism). There are three specialized forums for dealing specifically with labor issues in Eswatini, the Conciliation Mediation and Arbitration Commission (CMAC), The Industrial Court and the Industrial Court of Appeal.

The Wages Act 16, 1980 deals specifically with the minimum wages and basic terms and conditions of employment in virtually all sections of economic activity in Eswatini, be it in retail, manufacturing, agriculture or building and construction industry.

EEC requires Contractors to comply with the most current Wages Regulations Order for Building and Construction as issued by the Minister from time to time.

4. OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

The **Occupational Health and Safety Act 9, 2001** provides for the safety and health of persons at work and at the workplace and for the protection of persons other than persons at the workplace against hazards to safety and health arising out of or in connection with the activities of persons in the workplace and to provide for other matters incidental thereto. This Act entrusts the employer with the obligation to ensure the safety and health of all its employees, and also to mitigate risks of exposure to any hazards in the workplace.

The legislation makes it mandatory for employers to provide personal protective clothing or equipment to employees exposed to wet, dusty, noisy or any conditions that might expose the employees to harsh or dangerous conditions. Employees are to be trained to perform their work in order to avoid exposure to danger or injury and to be informed of any known hazards or diseases associated with the work they do.

5. RESPONSIBLE STAFF AND PROCEDURES

The overview of responsible staff and oversight mechanisms will be described in further detail in the Project ESMP which is currently being drafted. This is an overview – the details will flow from the ESMP and can be copied over at a later stage

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

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

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

Worker Grievances. EEC's procedures currently in place will remain for Project staff. Contractors will be required to present a worker grievance redress mechanism which responds to the minimum requirements in this LMP. The Project Management Unit's Social Officer will review records on a monthly basis. Where worker concerns are not resolved, the national system will be used as set out

in the section, but the Project Management Unit will keep abreast of resolutions and reflect in quarterly reports to the World Bank.

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

6. POLICIES AND PROCEDURES

Most environmental and social impacts of subprojects resulting from activities directly under the control of contractors will be mitigated directly by the same contractors. As a consequence, ensuring that contractors effectively mitigate project activities related impacts is the core of the Project's approach. EEC will incorporate standardized environmental and social clauses in the tender documentation and contract documents, in order for potential bidders to be aware of environmental and social performance requirements that shall be expected from them, are able to reflect that in their bids, and required to implement the clauses for the duration of the contract. EEC will enforce compliance by contractors with these clauses.

As a core contractual requirement, the contractor is required to ensure all documentation related to environmental and social management, including the LMP, is available for inspection at any time by the EEC or EEC appointed agents. The contractual arrangements with each project worker must be clearly defined in accordance with Eswatini law. A full set of contractual requirements related to environmental and social risk and impact management will be provided in the Projects' Environmental and Social Impact Assessment. All environmental and social requirements will be included in the bidding documents and contracts in addition to any additional clauses, which are contained, in the Projects environmental and social instruments.

Under no circumstances will EEC, the Ministry, Contractors, suppliers or sub-contractors engage forced labor. Forced labor includes bonded labor (working against an impossible debt), excessive limitations of freedom of movement, excessive notice periods, retaining the worker's identity or other government-issued documents or personal belonging, imposition of recruitment or employment fees payable 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 in a non-voluntary basis.

6.1 Occupational, Health and Safety

EEC is committed to:

1. Complying with legislation and other applicable requirements which relate to the company's occupational health and safety hazards.

2. Enabling active participation in OH&S risks elimination through promotion of appropriate skills, knowledge and attitudes towards hazards.
3. Continually improving the OH&S management system and performance.
4. Communicating this policy statement to all persons working under the control of EEC with emphasis on individual OH&S responsibilities.
5. Availing this policy statement to all interested parties at all EEC facilities and sites.³

Under current EEC rules, any contractor is required to have at least one Safety, Health and Environmental Representative for the workplace or a section of the workplace for an agreed period in accordance with Section 14 of the Eswatini Occupational Safety and Health Act (2001). At a minimum, the Representative must:

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

EEC further has specific requirements related to first aid provisions. The required scheduled are set out in Appendix 3 and 4 of this document. In accordance with these provisions, and to avoid work related accidents and injuries, the contractor will:

- Provide occupational health and safety training to all employees involved in works. Provide protective masks, helmet, overall and safety shoes, and safety goggles, as appropriate.
- Provide workers in high noise areas with earplugs or earmuffs.
- Ensure availability of first aid box.
- Provide employees with access to toilets and potable drinking water.
- Provide safety and occupational safety measures to workers with Personal Protection Equipment PPE when installing pumps to prevent accidents during replacement and installation and follow safety measures in installing submersible pump and cleaning the raiser pipes.
- Properly dispose of solid waste at designated permitted sites landfill allocated by the local authorities and cleaning funds; and attach the receipt of waste from the relevant landfill authority.

³ EEC's S-S-SH-D-01_Occupational Health and Safety Policy Statement (1)

- Carry out all procedures to prevent leakage of generator oil into the site.
- Ensure that the head of the well is covered tightly.
- Provide secondary tank for oil and grease to avoid spills.

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

6.2 Labor Influx and Gender Based Violence

Contractors will need to maintain labor relations with local communities through a code of conduct (CoC). The CoC commits all persons engaged by the contractor, including sub-contractors and suppliers, to acceptable standards of behavior. The CoC must include sanctions for non-compliance, including non-compliance with specific policies related to gender-based violence, sexual exploitation and sexual harassment (e.g., termination). The CoC should be written in plain language and signed by each worker to indicate that they have:

- received a copy of the CoC as part of their contract;
- had the CoC explained to them as part of induction process;
- acknowledged that adherence to this CoC is a mandatory condition of employment;
- understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.

A copy of the CoC shall be displayed in a location easily accessible to the community and project affected people. It shall be provided in English and SiSwati.

Contractors must address the risk of gender-based violence, through:

- Mandatory training and awareness raising for the workforce about refraining from unacceptable conduct toward local community members, specifically women. Training may be repeated;
- Informing workers about national laws that make sexual harassment and gender-based violence a punishable offence which is prosecuted;
- Adopting a policy to cooperate with law enforcement agencies in investigating complaints about gender-based violence;

Developing a system to capture gender-based violence, sexual exploitation and workplace sexual harassment related complaints/issues.

This process will be under the portfolio of the Social Standards Officer who shall identify and engage the relevant stakeholders on GBV and HIV and Aids issues.

7. AGE OF EMPLOYMENT

The Country ratified both the ILO Minimum of Age Convention (C138) and the ILO Worst Forms of Child Labour Convention (C182) in 2002. It also signed the African Charter on the Rights and Welfare of the Child in 1992, but has not yet ratified it. Section 97 of the Employment Act applies minimum age protections to children working in industrial undertakings, but it does not cover children

working in domestic and agricultural work. Similarly, Section 246 of the **Children's Protection and Welfare Act 6, 2012** prohibits hazardous work for children under the age of 18 in industrial undertakings, including in mining, manufacturing, and electrical work.

The minimum age of employment for this project shall be 18 years and to ensure compliance, all employees will be required to produce National Identification Cards as proof of their identity and age which is the national identification document required for employment.

If any contractor employs a person under the age of 18 years, that contractor's will not only be terminated by EEC but also be reported to the authorities. Section 248 of the **Children's Protection and Welfare Act** states that any person who employs under age children will be liable on conviction to a minimum fine of E100,000.00 or 5 years' imprisonment or both for a first offender. For a second offender, it is imprisonment of not less than 10 years.

8. TERMS AND CONDITIONS

As stated in section 3 of this LMP the terms and conditions of employment in Eswatini are governed by the provisions of **The Employment Act 5, 1980**. Section 22 of the Act makes it mandatory for employers to give its employees a copy of the written particulars of employment (Appendix 2), signed by both parties within six weeks of employment. This requirement however is not applicable to employees engaged for a fixed period of less than six weeks or anyone expected to work less than 21 hours per week. For this project, contractors will be required to provide all its employees with written particular of employment, including those excluded by the provision of S.22 and casual employees.

Contractors will also be required to comply with the most current Regulation of Wages Order for the Building and Construction Industry which is issued by the Government and reviewed on a regular basis. The Wages Order specifies the minimum wages, hours of work, overtime pay, leave entitlements, travelling and Subsistence Allowances and the issue of protective clothing.

Section 136 of the Act states that before a contractor is awarded a public contract, that contractor is required to certify in writing that the wages, hour and conditions of work or persons to be employed by him on the contract are not less favorable than those contained in the most current wages regulation issued by the Labour Commissioner. Where a contractor fails to comply with this requirement, Section 143 states that the contract with the contractor may be withdrawn as an approved contractor upon recommendations of the Labour Commissioner.

In ensuring full compliance with the law in this regard, contractors will be required to furnish EEC with copies of the Written Particulars of Employment or copies of contract of all its workforce. Contractors will not be allowed to deploy any employee to work in the project if such copy of employment of that employee has not been handed to EEC.

As a monitoring mechanism, Section 139 of the Act provides that a contractor shall not be entitled to any payment unless he has filed, together with his claim for payment, a certificate: - a) stating whether any wages due to employees are in arrears; b) stating that all employment conditions of the contract are being complied with. Section 141 authorizes the office of the Labour Commissioner to intervene if the contractor defaults in the payment of wages due to any of its employees by arranging

for the payment of the wages to the employee out of the sum payable to the contractor. However, for this project, it will be a material term of the contract to allow EEC to withhold payment from contractor should the contractor not fulfill their payment obligation to their workers.

8.1 Worker's Organization

The country has ratified the numerous ILO Conventions aimed at ensuring that member states do protect the notion of collective bargaining. These Conventions include; ILO Convention 87 on Freedom of Association and Protection of the Right to Organize and the ILO Convention 98 on the Right to Organize and Collective Bargaining. Section 32 (2) of The Constitution of Swaziland, 2005 on the Rights of Workers, guarantees all workers of their right to freely form, join or not join a trade union for the promotion and protection of the economic interest of that worker; and collective bargaining and representation. The Industrial Relations Act 2000 (as amended) was enacted to give effect to the collective bargaining, amongst other purposes. Section 4 (c) to (e) of the Act allows for the collective negotiation of terms and conditions of employment.

The EEC provides employees with the right to join and form an organization for purpose of labor representation. Presently the EEC has signed Recognition Agreements with two unions namely: National Electricity Supply Maintenance and Allied Staff Association (NESMASA) and the Swaziland Electricity Supply Maintenance and Allied Workers Union (SESMAWU). The former is for unionisable employees in managerial and supervisory positions whereas, the latter is for all other unionisable employees of the company. These unions have the right to represent its members during hearings and to negotiate favourable terms and conditions for their members (annually) amongst other rights.

9. DISCIPLINARY PROCEDURES AND GRIEVANCE MECHANISM

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

- Disciplinary action
- Individual grievances
- Collective grievances and negotiation of collective grievances
- Gender-based violence, sexual exploitation and workplace sexual harassment

9.1 Disciplinary Procedure

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

In terms of Clause 6 of the **Code of Good Practice: Termination of Employment**, these workplace rules must be: -

- Valid or reasonable;
- Clear and unambiguous;
- The employee is aware, or could reasonably be aware of the rule or standard; and
- the procedure to be applied in the event the employee contravenes any of these rules

The Code of Good Practice: Resolution of Disputes at the Workplace which is in terms of S.109 of **The Industrial Relations Act 2000 (as amended)** at Clause 4.2 requires employers to establish a fair and effective disciplinary procedure in the workplace, which should be in line with Clause 11 (Fair Procedure). The procedure is as follows: -

- a) Conduct an investigation to determine whether there are grounds for a hearing to be held;
- b) If a hearing is to be held, the employer is to notify the employee of the allegations using a form and language that the employee can understand;
- c) The employee is to be given reasonable time to prepare for the hearing and to be represented by a fellow employee or a union representative;
- d) The employee must be given an opportunity to respond to the allegations, question the witnesses of the employer and to lead witnesses;
- e) If an employee fails to attend the hearing the employer may proceed with the hearing in the absence of the employee;
- f) The hearing must be held and concluded within a reasonable time and is to be chaired by an impartial representative;
- g) If an employee is dismissed, it must be given the reasons for dismissal and the right to refer the dispute concerning the fairness of the dismissal to the Conciliation, Mediation and Arbitration Commission (CMAC).

Therefore, it is incumbent upon the Contractors to ensure that they have a disciplinary procedure and Code and standards which the employees are aware of. Each contractor will be required to produce this procedure to ensure that employees are not treated unfairly.

9.2 Individual Grievance Procedure

Clause 4.3 of the Code of Good Practice: Termination of Employment requires every employer, including contractors, to have a Formal Grievance Procedure which should be known and explained to the employee.

The Code recommends that such procedure should at least:

- a) Specify to whom the employee should lodge the grievance;
- b) Refer to time frames to allow the grievance to be dealt with expeditiously;

- c) Allow the person to refer the grievance to a more senior level within the organization, if it is not resolved at the lowest level;
- d) If a grievance is not resolved the employee has the right to lodge a dispute with CMAC.

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

9.3 Collective Grievances and Disputes resulting from the negotiations of Collective agreements

Where a trade union is recognized, it is entitled to negotiate on a regular basis with the employer over terms and conditions existing at the workplace and the employer is obliged to negotiate with it. The procedures followed in such instances is usually contained in the Recognition Agreement, which state how the issues are raised, the procedure for negotiations, the composition of the parties involved in the negotiation and the procedure to deal issues that are not resolved through consensus. **Clause 4.4** and **4.5** of the Code deals with the handling of collective grievances as raised by the employees.

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

9.4 Gender-based Violence, Sexual Exploitation and Workplace Sexual Harassment

EEC is an equal opportunity employer, but does not currently have a policy in place related to gender based issues or harassment in the workplace. In 2018, the Sexual Offences and Domestic Violence Act was signed into law in Eswatini and it is expected that a related Code of Good Practice will be developed as part of Codes under the Industrial Relations Act to address workplace issues. EEC has had preliminary discussions in regards to what policy and plans the utility will adopt, in addition to current existing procedures. As an initial step, Human Resources is planning to engage gender experts to provide staff with good practice during corporate wide briefings on health and safety which takes place on a weekly basis and where staff throughout the company are required to attend.

EEC will, with support from consultants, identify institutions and services provides who are actively engaged in prevention of gender-based violence, sexual exploitation and workplace sexual harassment in order to establish a manual for referencing any potential survivors. The manual will be updated as capacity and services are rapidly evolving in Eswatini. EEC, the project unit and the contractor is not equipped to handle complaints or provide relevant services to survivors, but will reference any person to relevant service providers, including health facilities, law enforcement's gender unit or others, as relevant using the information on available services. Should grievances related to gender-based violence be reported through the project/contractor, the nature of the complaint will be recorded along with the age of the complainant and relation to the project will be recorded but the issue will be referenced to relevant institutions.

In addition, the ESIA may identify additional mitigation measures related to gender and such measures will be reflected in site specific ESMPs, including the contractors ESMP or contractors specific Labour Management Plans, where required. This will include engagement with communities on gender related risks, grievance and response measures available, as identified in the manual.

10. CONTRACTOR MANAGEMENT

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

- **Labor conditions:** records of workers engaged under the Project, including contracts (see Appendix 2 for Eswatini requirements), registry of induction of workers including CoC (see section 6.2), hours worked, remuneration and deductions (including overtime), collective bargaining agreements;
- **Safety:** recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth).
- **Workers:** number of workers, indication of origin (expatriate, local, nonlocal nationals), gender, age with evidence that no child labor is involved, and skill level (unskilled, skilled, supervisory, professional, management).
- **Training/induction:** dates, number of trainees, and topics.
- **Details of any security risks:** details of risks the contractor may be exposed to while performing its work—the threats may come from third parties external to the project.
- **Worker grievances:** details including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.

The Project's oversight of contractors is set out in section 5 of this LMP. The following procedures are currently in place for EEC contractor management, but have been adjusted to adhere to LMP provisions:

1. Ensure that Contractors have valid contracts with clearly define service level agreement in accordance with EEC's Q-C-LE-A-01 and all environmental and social clauses, as applicable: Project Management Office, and reviewed by EEC Outsourced Services Officer
2. Contractor induction to EEC standards and LMP: Project Management Unit, attended by EEC Outsourced Services Officer;

3. Monthly submission of records: Contractor submission to Project Management Unit, copied to Project Management Unit. This includes:
 - a. Managing incidents and accidents, the Incident Reporting and Investigation Procedure (Q-S-OS-P-01) is followed and the Incident/Accident Monitoring Register (Q-S-OS-P-01-R-02) is used to monitor.
 - b. Contractor employees recorded using Contractors Employee List (Q-S-OS-P-01-F-05)
4. Monthly site visits (at a minimum) and reports: Project Management Unit, Social Officer, Environmental Officer;
5. Concerns or issues tracking using monitoring register (Q-S-OS-P-01-F-06). Outsourced Services Officer or issue specialist in the Project, depending on issue of concern.
6. Evaluation of contractor requirements. The includes training, OH&S files (Q-S-OS-P-01-F-05), certifications and other. The evaluation results in Portfolio Reports which includes recommendations for contract extension or termination. Outsourced Services Officer.
7. Training needs identification recorded in Contractor Training Schedule (Q-S-OS-P-01-F-03). Project Management Unit, Social Officer, Environmental Officer;
8. Annual Contractor Management Plans submitted using Q-S-OS-P-01-F-03. Project Management Unit;

11. COMMUNITY WORKERS

The project will not engage community workers. Community workers are not currently used by EEC in any projects due to the specialized labor needs required.

12. PRIMARY SUPPLY WORKERS

This section addresses labor management risk associated with people employed or engaged by EEC's primary suppliers. Primary suppliers are suppliers who, on an ongoing basis, provide goods or materials directly to the Project.

The project will require procurement of a substantial amount of materials, including cables, electro-mechanical equipment such as circuit breakers and switch isolators, wires, cables, protection and control equipment, power-poles, steel products etc. The risk associated with primary supply associated with the Project is assessed below. All primary suppliers are formal businesses who are required to procure and produce materials subject to high standards. Any new supplier is vetted using a different form which screens the supplier in regard to compliance with taxes, certification, licensing, Public Liability Certificate and workmen's compensation.⁴ A separate form requires that the primary supplier identify the company's permanent staff, and declare any current or prior arbitrations as well as any criminal convictions.⁵ Registered suppliers are subject to regular review

⁴ As of March 1, 2019 utilizing NEW SUPPLIER EVALUATION SHEET Q-F-CS-P-05-F-05, Rev 1. The form is subject to review, refer to most recent update.

⁵ As of March 1, 2019 utilizing SUPPLIER REGISTRATION FORM Q-F-CS-P-10-F-01, Rev 1. The form is subject to review, refer to most recent update.

in accordance with EEC by the Commercial Services Department.⁶ The review is carried out twice annually and requires a Commercial Services Officer to visit the supplier's premises. The supplier evaluation form provides for the Commercial Services to report any labor irregularity if observed. As of March 1, 2019, 32 suppliers have prior approval, but primarily procures materials from approximately 15 suppliers that consistently meets cost and quality assessments.

These Labor Management Procedures require that, under the project, any primary supplier maintains records related to occupational injuries, illness and lost time accidents. These records will be subject to review by Commercial Services inspection twice annually and requires and update of EEC's form "SUPPLIER EVALUATION FORM Q-F-CS-P-05-F-02, Rev 1". EEC will also ensure, that any primary supplier to the project report fatalities or serious injury, and informs government authorities in accordance with national reporting requirements. Any such incidents will be reflected in the observations section of "SUPPLIER EVALUATION FORM Q-F-CS-P-05-F-02, Rev 1".

⁶ As of March 1, 2019 utilizing SUPPLIER EVALUATION FORM Q-F-CS-P-05-F-02, Rev 1. The form is subject to review, refer to most recent update.

13. Appendix 1: Comparative Table of ESF and National Objectives and Requirements

ESF Objectives	National Requirements	Recommended Actions
ESS 2 Labor and Working Conditions		
<ul style="list-style-type: none"> To provide every employee with written particulars of employment 	<p>The Employment Act 5, 1980</p> <p>S.22 - makes it mandatory for the employer to give each of its employees a copy of the written particulars of employment, signed by both parties within six weeks of commencement of the employment. This requirement is not applicable to employees engaged for a fixed period of less than six weeks or anyone expected to work less than 21 hours per week.</p> <p>S.30 - makes it an offence to provide an employee with such form with fine of not more than E3,000.00 or imprisonment of not more than 1 year or both.</p> <p>S.136 - requires that before a contractor is awarded a public contract, that contractor is required to certify in writing that the wages, hour and conditions of work or persons to be employed by him on the contract are not less favourable than those contained in the most current wages regulation issued by the Labour Commissioner.</p> <p>S.143 - states that the contract with the contractor may be withdrawn as an approved contractor upon recommendations of the Labour Commissioner.</p>	<ul style="list-style-type: none"> Post award, the contractors will be required to furnish EEC with copies of the Written Particulars of all its employees or Contracts of employment including those who work below 21 hours a week and casual employees. The contract employment shall atleast have the information contained in the prescribed template of the Form Contained in the Second Schedule as can be seen in Appendix 1 Each contractor will be required to provide EEC with such information as required in terms of S.136 as part of the tendering process.
<ul style="list-style-type: none"> To promote safety and health at work. 	<p>The Occupational Safety and Health Act 9, 2001</p> <p>- This Act provide for the safety and health of persons at work and at the workplace and for the protection of persons other than persons at the workplace</p>	<ul style="list-style-type: none"> Each contractor will be required to have a SHEQ Officer and First Aider Contractors required to keep logs of incidents and should be reported and investigated timeously.

	<p>against hazards to safety and health arising out of or in connection with the activities of persons in the workplace and to provide for other matters incidental thereto.</p> <ul style="list-style-type: none"> - S.9 – entrusts the employer to ensure the safety and health of all its employees, and also to; - Mitigate risks of exposure to danger of its workforce; - Provide personal protective clothing or equipment to employees exposed to wet, dusty, noisy or any conditions that might expose the employees to harsh or dangerous conditions; - To train its workers to perform their work in order to avoid exposure to danger or injury; and - to inform employees of any known hazards or disease associated with the work. <p>The Factories, Machinery and Construction Works Act 17, 1972</p> <ul style="list-style-type: none"> - This legislation provides for the registration of factories and the regulations of working conditions and the use of machinery at factories, construction works and other premises and for matters incidental thereto - The Act mandates the office of the Labour Commissioner to monitor and inspect any working environment or structure to determine its suitability. - The office of the Labour Commissioner is also required to investigate incident or accident involving any person injured in connection with the activities of the employer. <p>The Workman’s Compensation Act 7, 1983</p>	<ul style="list-style-type: none"> • EEC will conduct induction talks to workers and contractors weekly
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	<ul style="list-style-type: none"> - it provides for the compensation and medical treatment of workmen who suffer injury or contract diseases in the course of their employment. - The scope of its application extends to not an injury or accident that occurs within the workplace but also while the employee is travelling by reasonable means and within any reasonable route between the workplace and his place of residence - In terms of the Act, Workman is any person who has entered into the works under the contract of service or of apprenticeship or of traineeship whether the contract is express or implied, is oral or in writing whether the remuneration is calculated by time or work done. 	
<ul style="list-style-type: none"> • To promote the fair treatment, non-discrimination and equal opportunity of project workers. 	<p>The Employment Act 5/1980</p> <p>S.29 - prohibits employers from discriminating against any person on grounds of race, colour, religion, marital status, sex, national origin, tribal or clan extraction, political affiliation or social status</p> <p>S.30 - makes it an offence to discriminate against any person as envisaged in S.29. Such employer if found guilty shall be liable on conviction to a fine not exceeding E3,000.00 or imprisonment not exceeding 1 year or both.</p> <p>S.96 - mandates employers to accord female employees the same treatment as their male counterparts in the workplace and also pay them 'equal pay for equal work'.</p>	<ul style="list-style-type: none"> • Contractors will be required to comply with national legislation when recruiting
<ul style="list-style-type: none"> • To prevent the use of all forms of forced labor 	<p>The Employment Act 5, 1980</p> <p>(Part XIV) - Forced Labour</p>	<ul style="list-style-type: none"> • Contractors will be required to comply with national legislation and as

	<p>S.144 – prohibits all works or service which is extracted from any person under the threat of any penalty and for which the said person has not offered himself voluntarily.</p> <p>S.147 – states that, if any person acting in an official capacity coerces any person under his charge, that person shall be held personally liable and shall be liable to a fine not exceeding E3,000.00, or imprisonment not exceeding one year or both.</p>	<p>precautionary measure EEC will conduct an induction</p> <ul style="list-style-type: none"> • Random inspection will be done on a regular basis to ensure compliance
<ul style="list-style-type: none"> • To prevent the use of all forms of child labour 	<p>The Country ratified both the ILO Minimum of Age Convention (C138) and the ILO Worst Forms of Child Labour Convention (C182) in 2002. It also signed the African Charter on the Rights and Welfare of the Child in 1992, but has not yet ratified it.</p> <p>The Employment Act 1980</p> <p>S.97 – Prohibits the employment of children below the age of 15.</p> <p>The Children’s Protection and welfare Act 6, 2012</p> <p>S.234 – Minimum age of engagement for children is 15</p> <p>S.236 – children below the age of 18 cannot be engaged in any form of hazardous employment</p> <p>S.248 – any person who employs under age children I liable on conviction to a minimum fine of E100, 000.00 or 5 years’ imprisonment or both for a first offender. For a second offender, it is imprisonment of not less than 10 years.</p>	<ul style="list-style-type: none"> • Contractor will be prohibited to employ anyone under the age of 18 years. • Monitoring will be done through the National ID system which every employee is required to produce on employment. • If a contractor is found to have engaged under age kids for the project: - a formal case will be reported to the police and the contract will be terminated

<ul style="list-style-type: none"> • To support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law. 	<p>The country has ratified the numerous ILO Conventions aimed at ensuring that member states do protect the notion of collective bargaining. These Conventions include; ILO Convention 87 on Freedom of Association and Protection of the Right to Organize and the ILO Convention 98 on the Right to Organize and Collective Bargaining. Section 32 (2) of The Constitution of Eswatini, 2005 on the Rights of Workers, guarantees all workers of their right to freely form, join or not join a trade union for the promotion and protection of the economic interest of that worker; and collective bargaining and representation. The Industrial Relations Act 2000 (as amended) was enacted to give effect to the collective bargaining, amongst other purposes. Section 4 (c) to (e) of the Act allows for the collective negotiation of terms and conditions of employment.</p> <p>Part 4 of The Industrial Relations Act 2000 (as amended) deals with the registration and/or formation of Employee, Staff and Employer Organizations, Federations and International Organizations. In terms of S. 26 (3) of the Act a minimum of six employees can form a trade union by obtaining a Certificate of Registration through the office of the Labour Commissioner (S.27). Once registered, a trade union can recruit any employees who falls within its bargaining unit with that particular employer. S.42 (9) states that once the union has recruited more than fifty percentile of the employees in respect of which it seeks recognition, the union can then apply for recognition with the employer. The employer is obliged to recognize the</p>	<ul style="list-style-type: none"> • EEC has two recognized unions NESMASA and SESMAWU • Contractors need to inform their workers of their right to organize. • The Written Particulars of Employment as prescribed by S.22 of the Employment Act 1980 allows employee to state the trade union they are affiliated to on employment.
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	<p>trade union if it meets the required threshold. If, however the union membership is below the threshold the employer is not obliged to recognize the union but can exercise its discretion. Once a union is recognized, it has the right to bargain or negotiate for and on behalf of its members and also to represent them at the workplace.</p>	
<ul style="list-style-type: none"> To provide project workers with accessible means to raise workplace concerns. 	<p>In implementing an effective dispute management system consideration must be given to the disputed resulting from the following:</p> <ol style="list-style-type: none"> 1. Disciplinary action 2. Individual grievances 3. Collective grievances 4. Negotiation of collective grievances <p>1. <u>Disciplinary Procedure</u></p> <p>THE Code of Good Practice: Resolution of Disputes at the Workplace which is in terms of S.109 of The Industrial Relations Act 2000(as amended) at Clause 4.2 requires employers to establish a fair and effective disciplinary procedure in the workplace, which should be in line with Clause 11 (Fair Procedure). The procedure is as follows: -</p> <ol style="list-style-type: none"> a) Conduct an investigation to determine whether there are grounds for a hearing to be held; b) If a hearing is to be held, the employer is to notify the employee of the allegations using a form and language that the employee can understand; c) The employee is to be given reasonable time to prepare for the hearing and to be represented by a fellow employee or a union representative; d) The employee must be given an opportunity to respond to the allegations, question the witnesses of the employer and to lead witnesses; 	<ul style="list-style-type: none"> Contractors will be required to comply with national legislation in this regard. Contractors will be required to have a grievance procedure EEC will require contractors to log worker's grievances in monthly reports.

	<p>e) If an employee fails to attend the hearing the employer may proceed in with the hearing in the absence of the employee;</p> <p>f) The hearing must be held and concluded within a reasonable time and is to be chaired by an impartial representative;</p> <p>g) A dismissed employee must be given the reasons for dismissal and the right to refer the dispute concerning the fairness of the dismissal to the Conciliation, Mediation and Arbitration Commission (CMAC).</p> <p>2. <u>Individual Grievance Procedure</u></p> <p>Clause 4.3 requires every employer to have a Formal Grievance Procedure which should be known and explained to the employee.</p> <p>The Code recommends that such procedure should atleast:</p> <p>a) Specify to whom the employee should lodge the grievance;</p> <p>b) Make reference to time frames to allow the grievance to be dealt with expeditiously</p> <p>c) Allow the person to refer the grievance to a more senior level within the organization, if it is not resolved at the lowest level.</p> <p>d) If a grievance is not resolved the employee has the right to lode a dispute with CMAC.</p> <p>3. <u>Collective Grievances and Disputes resulting from the negotiations of Collective agreements</u></p> <p>Clause 4.4 and 4.5 of the Code deals with the handling of collective grievances as raised by the employees. This procedure is usually contained in the</p>	
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	<p>Recognition Agreement the parties sign from the onset.</p> <p>What is common to these disputes is that in the event the parties fail to resolve the dispute, either can lodge a dispute with CMAC and subsequently the Industrial Court.</p>	
<p>To protect project workers, including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate.</p>	<ul style="list-style-type: none"> • S.20 of the Constitution guarantees citizens the right to equality before the law in all spheres and it further affirms that a person shall not be discriminated against on the grounds of gender, race, color, ethnic origin, tribe, birth, creed or religion, or social or economic standing, political opinion, age or disability. • S.29 of The Employment Act 1980 states that, no employer shall discriminate against any person or between employees on grounds of race, color, religion marital status, sex national origin, tribal or clan extraction, political affiliation or social status. • Community Workers are not used by EEC and will not be used for this project • Rights of woman – S28(1) of The Constitution guarantees the rights of woman to equal treatment with men including equal opportunities in political economic and social activities. S.96(1) of The Employment Act 1980 also requires employers not to discriminate between male and female employees by failing to pay equal pay for equal work. • Primary Supply Workers - Registered suppliers are subject to regular review in accordance with EEC by the Commercial Services Department. The review is carried out twice annually and requires a Commercial Services Officer visit the supplies premises. The supplier evaluation form provides Commercial Services to observe any labor irregularity. 	<ul style="list-style-type: none"> • EEC will also ensure, that any primary supplier to the project report fatalities or serious injury, and informs government authorities in accordance with national reporting requirements. Any such incidents will be reflected in the observations section of “SUPPLIER EVALUATION FORM Q-F-CS-P-05-F-02, Rev 1”. • National legislation will be applied however, the World Bank standards will be enforced where there are inefficiencies

	<ul style="list-style-type: none"> • S.2 read with S.16 (7) of The Industrial Relations Act 2000 states that where it is found that the reason for the termination of an employee's services is that the employer discriminated against an employee directly or indirectly, that employee shall be awarded compensation of not more than 24 months' remuneration calculated at the rate of the employee's rate of remuneration at the time of dismissal. This compensation serves as a deterrent as is it double the amount of compensation awarded to any other form of compensation. 	
ESS 4 Community Health and Safety		
<ul style="list-style-type: none"> • To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project lifecycle from both routine and non-routine circumstances. 	<p>1. The Public Health Act, 1969 This Act provides for the establishment of processes to ensure public health at all phases of a project. It also provides for steps to take should there be any incident from the project affecting the public and lays out responsibilities for actions to be taken.</p>	<p>National requirements and ESF objectives are aligned. No significant gaps are noted. It is recommended that both World Bank ESF objectives and National Requirements apply to the project.</p>
<ul style="list-style-type: none"> • To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams. 	<p>2. The Occupational Health and Safety Act, 2001: This Act provides for the safety and health of both employees and the public, especially during the construction phase of proposed projects, and specifies processes to be undertaken in order to ensure that safe and health practices are adhered to and implemented at work.</p>	
<ul style="list-style-type: none"> • To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials. 		
<ul style="list-style-type: none"> • To have in place effective measures to address emergency events. 		
<ul style="list-style-type: none"> • To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities. 	<p>3. The Road Traffic Act, 2007 This Act provides for the compliance of all roads users and for those organizations such as EEC conducting works on and/or along public roads.</p> <p>4. EEC Hazard Identification, Risk Assessment and Determining Control Procedure (S-S-SH-P-01, REV 3):</p>	

	<p>This procedure ensures that EEC has an on-going hazard identification, risk assessment and management process, necessary for all its operations.</p> <p>5. Emergency Preparedness Response Plan (S-S-SH-M-01, REV 1): This document provides processes for when there are emergency situations at EEC and surrounding areas. It details procedures, and responsibilities.</p> <p>6. EEC Occupational Health and Safety Implementation Plan (S-S-SH-D-04, REV 1): This document provides for the management and control of EEC's significant health and safety hazards, with an overall objective to ensure the effective implementation and management of health and safety issues.</p> <p>1. EEC Occupational Health and Safety Policy Statement (S-S-SH-D-01, REV 5): This document underlines EEC's commitment to the prevention of work-related injury and ill-health associated with the company's activities.</p>	
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14. Appendix 2: Written Particulars of Employment

As required by Section 22 of the Swaziland Employment Act.

SECOND SCHEDULE

(WRITTEN PARTICULARS OF EMPLOYMENT)

(Regulation)

1. Name of Employer
2. Name of Employee
3. Date Employment began
4. Wage and Method of Calculation
5. Interval at which wages are paid
6. Normal Hours of work
7. Short description of employee's work
8. Probation Period
9. Annual Holiday Entitlement
10. Paid Public Holiday
11. Payment during sickness
12. Maternity Leave (if employee female)
13. Nursing Break Entitlement (for female employee)
14. Notice employee entitled to receive
15. Notice employer required to give
16. Pension Schedule, Provident Fund Gratuity Schedule etc. (if any, other than SNPF)
17. Any other matter either party wishes to include

Notes:

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

.....
Employer's signature

.....
Witness

.....
Employee's signature

.....
Witness

.....
Date

.....
Date

15. Appendix 3: Contractors SHE File Monitoring Form (ECC)

Contractor Name; Depot;

Instructions: Tick (√) if available, put a cross(X) if unavailable. Tick (√) if there was activity, put a cross(X) if there was no activity. Tick (√) if there's evidence, put a cross(X) if there's no evidence. Make a Comment according to the changes that have taken place as reflected by availability, activity and evidence on each SHE item.

#	Monthly Checklist: SHE items	Available	Activity	Evidence	Comment
1	Exposure to SEC IMS Policies,				
2	Valid Working Contract,				
3	Current Employee List (Q-S-OS-P-01-F-05),				
4	Confirmation Letter Inc. copy of ID (per employee),				
5	Understanding of Resources, roles, responsibilities & authority,				
6	Inductions - all contractor staff				
7	HIRA & Reporting; Incidents, accidents & near misses				
8	Appointment letters; for # 9, 10, 11 below				
9	SHE Certificates; Safety Rep				
10	SHE Certificates; 1st Aider				
11	Mandatory Qualifications – as per the evaluation form				
12	Vehicles; CoF, Bluebook, Daily inspection sheet, Driver Permit				
13	Current Evaluation form,				
14	PPE: Branded & Properly worn at all times,				
15	Internal Communication; minutes showing meetings,				
16	NCR's Received and closed,				
17	Environment Management Aspects (the 8 elements),				
18	First Aid Kit: availability and usage of the form,				
19	Fire extinguisher; valid				
20	Any other				

SEC SHE Rep

Signature

Date compiled

Contractor SHE Rep

Signature

Date compiled

16. Appendix 4: First Aid Box Contents Checklist⁷

1. Items in the first aid box are minimum contents as per the South African Occupational Health and Safety Act 85 of 1993. Checklist must be completed every month to ensure compliance with the law.

Checked by:

PF #:

Month and year:

Work Station:

#	ITEM	Quantity Specified	Quantity Present in Box	Comment
1.	Adhesive elastic plasters assorted 20's	1 Box		
2.	Roller bandages-conforming 100mm	4 Rolls		
3.	Roller bandages-conforming 75mm	4 Rolls		
4.	CPR Mouthpieces	2		
5.	Cotton wool 50 gram	2 Rolls		
6.	Fabric roll plaster 25mm x3M	1 Roll		
7.	First Aid dressing No 3 75x 100mm	4		
8.	First Aid dressing No 4 150x 200mm	4		
9.	Forceps- 10cm	1		
10.	Gauze swabs 75mm x 75mm 100's	1 Packet		
11.	Gauze swabs 75mmx75mm Sterile 5's	2 Packets		
12.	Gloves-Latex Large	2 Pairs		
13.	Gloves-Latex Medium	2 Pairs		
14.	Hypoallergenic Adhesive Tape 25mm x 3M	1 Roll		
15.	Safety Pins Bunch of 12	1 Bunch		
16.	Scissors- 10cm	1		
17.	Splints-Straight	2		
18.	Triangular Bandages	4		
19.	Wound Cleaner- CENTRIMIDE 1% 100ml	1 Bottle		

2. Contents should be regularly replenished by respective department

3. Any deficiencies should be reported to the Safety Officer or SHERQ Representative

⁷ S-S-SH-P-03-F-05_First Aid Box Contents Checklist (1).