

ESWATINI ELECTRICITY COMPANY



LABOR MANAGEMENT PROCEDURES (LMP) FOR THE ACCELERATING SUSTAINABLE AND CLEAN ENERGY ACCESS TRANSFORMATION (ASCENT) ESWATINI PROJECT

PROJECT ID NO: P508960

OCTOBER 2025

Table of Contents

1. INTRODUCTION	4
2. PROJECT DESCRIPTION.....	4
3. OBJECTIVES OF THIS LABOR MANAGEMENT PROCEDURE (LMP)	5
3.1 ESS2: Labor and Working Conditions	6
3.2 ESS4: Community Health and Safety	6
3.3 Occupational and Community Health and Safety Implementation Plan	6
4. OVERVIEW OF LABOR USE ON THE PROJECT	7
4.1 Estimated Number and Types of Project Workers.....	7
4.2 Labor Requirements: Distribution and Connections for Components 1b & 2	8
4.3 Labor Requirements: Transmission Reinforcement (Component 1a).....	9
4.4 Timing of Labor requirements	11
5. REGULATORY FRAMEWORK	11
6. OVERVIEW OF LABOR LEGISLATION	13
6.1 Basic Conditions of Employment.....	13
6.2 Terms and Conditions of Employment	15
6.3 Occupational health and safety (OHS).....	17
7. ASSESSMENT OF KEY POTENTIAL RISKS	18
8. ACCOMMODATION REQUIREMENTS FOR COMPONENTS 1B AND 2	10
8.1 Types of accommodation	10
9. INSTITUTIONAL ARRANGEMENTS FOR THE IMPLEMENTATION OF THE LMP	12
9.1 Roles and Responsibilities of the PU	12
9.2 Contractor Responsibilities.....	14
9.3 Owners Engineer (OE)	15
9.4 Third-Party Independent Monitoring Agency	15
9.5 Community Liaison Officers (CLO's).....	15
9.6 Support Staff	16
10. GRIEVANCE REDRESS MECHANISM	17

11. CONTRACTUAL PROVISIONS AND NON-COMPLIANCE REMEDIES	18
12. PERFORMANCE MONITORING	18
12.1 Monitoring Performance of Contractors	19
Appendix 1: Written Particulars of Employment.....	20
Appendix 2: Contractors SHE File Monitoring Form (EEC)	21
Appendix 3: First Aid Box Contents Checklist	22
Appendix 4: Code of Conduct for ASCENT	23
Appendix 5: Illustrations Of Prohibited Behaviors Related To SEA/SH	27
Appendix 5 : Lease Agreement Sample	28
Appendix 6: Accommodation Check List	29

List of Tables

<i>Table 1: Package-A: Estimated Manpower for the completion of 132kV Transmission line component of Project.....</i>	<i>9</i>
<i>Table 2: Package-B: Estimated Manpower for the completion of 132kV Substations component of Project</i>	<i>9</i>
<i>Table 3: Package-C: Estimated Manpower for the completion of 66kV Transmission line component of Project.....</i>	<i>10</i>
<i>Table 4: Package-C: Estimated Manpower for the completion of 66kV Substations component of Project</i>	<i>10</i>
<i>Table 5: Payment of Overtime</i>	<i>14</i>
<i>Table 6: Compassionate leave breakdown</i>	<i>15</i>
<i>Table 7: Summary of relevant sections and units within the Department of Labor</i>	<i>17</i>
<i>Table 8: Labor risks and mitigation measures</i>	<i>0</i>
<i>Table 9: Eswatini's four administrative regions and 59 Tinkhundla constituencies</i>	<i>10</i>
<i>Table 10: Requirement for all type of Accommodation</i>	<i>11</i>
<i>Table 11: PIU responsibilities</i>	<i>13</i>

ACRONYMS

ASCENT	Acerating Sustainable and Clean Energy Transformation
CESMP	Contractor Environmental Social Management Plan
CLO	Community Liaison Officer
CMAC	Conciliation Mediation and Arbitration Commission
CMP	Comprehensive Mitigation Plan
E&S	Environment and Social
EEC	Eswatini Electricity Company
EHS	Environment Health and Safety
EHSS	Environmental, Health and Safety and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESSs	Environment and Social Standards
GBV	Gender-Based Violence
GoKE	Government of the Kingdom of Eswatini
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HIV/AIDS	Human Immune Virus/ Acquired Immune Deficiency Syndrome
ILO	International Labor Organization
IMS	Integrated Management System
LMP	Labor Management Procedure
MNRE	Ministry of Natural Resources and Energy
NCP	Neighborhood Care Points
NGO	Non-Governmental Organization
OE	Owners Engineer
OCHSIP	Occupational and Community Health and Safety Implementation Plan
OHS	Occupational Health and Safety
PAP	Project Affected People
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
SDO	Social Development Officer
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
SHERQ	Safety Health Environment Risk and Quality
STI	Sexually Transmitted Infections
TPM	Third Party Monitor
WB	World Bank

1. INTRODUCTION

The Government of the Kingdom of Eswatini (GoKE), under the coordination of the Ministry of Natural Resources and Energy (MNRE), has received syndicated financing from the International Bank for Reconstruction and Development (IBRD), the International Development Association (IDA), and grant funding from the Global Public Good (GPG) Facility all under the World Bank to implement the Accelerating Sustainable and Clean Energy Access Transformation in Eswatini (ASCENT Eswatini) Project (P508960).

The Project will be implemented through the Eswatini Electricity Company (EEC), which will serve as the Implementing Agency responsible for the management and fiduciary aspects of the Project on behalf of the GoKE.

ASCENT Eswatini aims to support the Government's national goal of achieving universal access to modern energy services by 2030, as articulated under the Mission 300 (M300) commitments announced in 2025 in Dar es Salaam, Republic of Tanzania. The Project seeks to improve the reliability of electricity supply and connect 50,000 households, thereby advancing inclusive and sustainable energy access across the country.

The Project's total financing amounts to USD 100 million, comprising USD 39 million from IDA, USD 51 million from IBRD, and an additional USD 10 million in grant funding from the GPG Facility. Together, these resources will contribute to strengthening Eswatini's energy infrastructure, supporting last-mile connectivity, and promoting clean, affordable, and reliable energy access for all citizens by 2030.

2. PROJECT DESCRIPTION

This project builds upon the achievements of Eswatini's ongoing Network Reinforcement and Access Project (NRAP) and adopts an integrated approach to electrification aligned with the Rural Electrification Plan and the National Energy Policy (2018). The initiative aims to accelerate progress toward universal electricity access by 2030 through a combination of infrastructure development and capacity-building interventions. Key activities will include network reinforcement and construction, on-grid network expansion, last-mile connectivity, and the deployment of solar home systems. In addition, the project will implement targeted technical assistance to enhance energy security, strengthen sector financial viability, improve sector planning, and build institutional capacity. Through these efforts, the project is expected to provide electricity access to approximately 200,000 people, significantly advancing Eswatini's progress toward achieving universal energy access. The Project is composed of the following components:

- **Component 1: Networks Reinforcement**
 - *Subcomponent 1a: Reinforcement of the Southern Transmission Grid*
 - Construction of a 2x10MVA 66/11kV substation at Ntabamhloshana (Manzini region).
 - Construction of a 20km 66kV overhead power sub-transmission line from Pine Valley to Maphalaleni/Nsingweni, with an associated 1x10MVA 66/11kV substation (Hhohho region).

- Construction of a 55km 132kV overhead power transmission line from Maliyaduma (Manzini region) to Nkambeni (Lubombo region), with an associated 132kV switchyard and 2x40MVA 132/66kV substation.
- Appointment of an Owner's Engineer (OE) to support the Project Implementation Unit (PIU).
- *Subcomponent 1b: Distribution Network Reinforcement*
 - Construction of new substations and feeders.
 - Construction of new MV and LV distribution lines.
 - Upgrading of existing MV lines and substations.
 - Installation of auto-reclosers, transformers, protection schemes, metering, and system operation and control enhancements.
 - Installation of fibre optic cables.
- **Component 2: Electricity Access Expansion**
 - *Subcomponent 2.1: On-grid peri-urban and rural electrification (last mile connectivity)*
 - Construction of LV reticulations.
 - Supply and installation of ready-boards for households unable to afford household wiring.
 - Capacity building for electrical contractors.
 - Cost-of-service study and financial viability assessment model.
 - Engagement of an Independent Verification Agent (IVA) for Performance-Based Conditions (PBCs).
 - *Subcomponent 2.1.2: On-grid last mile connectivity with PBCs*
 - Provision of performance-based and catalytic grants to off-grid solar system providers.
 - Technical assistance to design and implement off-grid electrification solutions.

3. OBJECTIVES OF THIS LABOR MANAGEMENT PROCEDURE (LMP)

The Labor Management Procedure (LMP) has been developed to guide the social due diligence process for activities implemented under Component 1 and 2 of the ASCENT Project. It establishes clear procedures for identifying, assessing, and managing labor-related risks and impacts associated with the Project, in line with the objectives of the World Bank's Environmental and Social Standards (ESS) 2 and 4. It serves as a key instrument to ensure that labor management practices are consistent, transparent, and compliant with national legislation and World Bank requirements.

Specifically, the LMP facilitates the planning and implementation of project activities by outlining processes for identifying labor needs, assessing potential risks and impacts, and allocating adequate resources to address them. It provides guidance to all project-related parties including the Project Implementing Unit (PIU), contractors, sub-contractors, and project workers whether full-time, part-time, temporary, seasonal, or migrant workers on the standards and procedures to be followed regarding employment, working conditions, occupational health and

safety, grievance redress, and overall labor relations. Through this framework, the LMP ensures that all project workers are managed fairly, safely, and in accordance with good international industry practices. This LMP will follow the objectives in ESS 2 and ESS 4.

3.1 ESS2: Labor and Working Conditions

This Standard obligates the Borrower (GoKE) to develop and implement written LMP applicable to the Project. The LMP sets out the ways in which project workers will be managed, in accordance with the requirements of the national laws of the country, where the Project activities will be implemented and the following provisions of ESS2:

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

3.2 ESS4: Community Health and Safety

The Standard puts emphasis on community exposure to risks and impacts of the project and includes road safety risks, as well as addressing water-related, communicable, and non-communicable diseases that can result from projects activities and have impact on project labor as well as the community through the following stated objectives:

- To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and non-routine circumstances.
- To promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure.
- To avoid or minimize community exposure to project-related traffic and road safety risks, diseases, and hazardous materials.
- To have in place effective measures to address emergency events.
- 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.

3.3 Occupational and Community Health and Safety Implementation Plan

The OCHSIP guidelines have been developed to address identification of all potential hazards to project workers, particularly those that may be life-threatening, provision of preventive and

protective measures via modification, substitution or elimination of hazardous conditions, training of project workers, emergency preparedness and response arrangements to emergencies, documentation, reporting and identification of remedies of incidents and accidents.

The following guidelines shall be adhered to by all contractors;

- Identify all occupational community health and safety hazards and associated risks as early as possible in the Project cycle.
- Involve SHE professionals who have the experience, competence and training necessary to assess and manage SHE impacts and risks.
- OCHSIP implementation guidelines should be monitored.

4. OVERVIEW OF LABOR USE ON THE PROJECT

The total number of workers expected to be engaged across all components of the Project is estimated to range between 465 and 964, including all employees hired by contractors and subcontractors. This LMP applies to all categories of project workers, whether full-time, part-time, temporary, or migrant. The Project will employ a mix of local workers from nearby communities and others from different parts of Eswatini, as well as a limited number of foreign workers. Based on experience with similar transmission line projects, it is anticipated that most of the internal migrants will be skilled or semi-skilled workers with experience in high, medium, and low voltage infrastructure (Components 1a, 1b, and 2). Foreign or international workers are expected to fill in management and specialized technical roles requiring expertise in high-voltage systems, with their numbers depending on the contractors' specific labor requirements.

Given the nature of the Project's workforce comprising mostly unskilled and semi-skilled construction labor and the characteristics of Eswatini's labor market, it is estimated that women will represent about 5–10% of the total workforce. Female workers are likely to occupy technical (engineering) and administrative roles, particularly within the construction site offices. In accordance with the Employment Act of 1980, all workers will be at least 18 years old. The workforce will largely consist of economically active individuals aged 30 to 45 years, representing a significant portion of the national labor force. In line with ESS2, these categories of workers are described in more detail below;

4.1 Estimated Number and Types of Project Workers

4.1.1 Direct Workers

This category of workers will comprise a mix of government civil servants from MNRE supporting project implementation as well as the EEC personnel (including the PIU) estimated at around 80. Government civil servants remain subject to the terms and conditions of their existing public sector employment agreement or arrangement but will otherwise be subject to the provisions of paragraphs 17-20 and 24-30 of ESS2. Other direct workers employed for the project will be fully subject to paragraphs 9 to 30 of ESS2 requirements.

4.1.2 Contracted Workers

The Project will engage an estimated number of 964 contracted workers. These are grouped into two (2) broad categories which include consultants who will provide implementation support services (RAP consultants, Owner's Engineer (OE) and Third-Party Monitoring Agency (TPM)) to the Project. The other category of contracted workers includes the workers of contractors/sub-contractors, and primary suppliers for provision of various services and goods required to complete the Project in accordance with specifications. Contracted workers will also be hired for the design, installation and commissioning of works.

4.1.3 Primary Supply Workers

Approximately 20 material suppliers will provide goods or materials directly to the Project. The Engineering Procurement Construction (EPC) contractor for Component 1a of the Project will engage its own suppliers. All suppliers must meet national legal requirements and ESS2 (paras. 39–42).

4.1.4 Community Workers

An estimate of around 60 Community Liaison Officers (CLOs), who are community workers for purposes of this Project, will be engaged for the duration of the Project. Each CLO represents an affected chiefdom within the Project area for specifically component 1a of the Project.

Each Chief, in consultation with the chiefdom's inner council follows customary practices in appointing each CLO. The CLOs form part of the PIU structure and report to the Social Development officer on E&S issues. In line with the provisions of ESS2, the EEC shall provide each CLO with a monthly salary in accordance with the Eswatini labour laws. The Project worker grievance mechanism, established in line with ESS2 paragraphs 21-23, shall also be applicable to the CLOs to raise workplace concerns and grievances, including workplace sexual exploitation and harassment issues.

4.2 Labor Requirements: Distribution and Connections for Components 1b & 2

The upgrades in the distribution network and new connections are expected to benefit 50,000 households. The work for components 1b and 2, which will require an estimation of 256 workers, to be carried out by a minimum of 14 and maximum of 85 electrical contractors as well a minimum of seven (7) survey contractors engaged throughout the Project worksite locations. It is anticipated that each electrical contractor will have one or more teams of not less than 12 people per team. It is anticipated that each survey contractor will have one or more teams of not more than 5 people per team. However, at no single time will 256 Project workers be working under Components 1b and 2 Project at the same community. Instead, there will be a total of 16 Project workers in each community at any one time, 12 crew construction and 4 members for service work. These teams are composed mainly of workers coming from within Eswatini and who are contractually obligated to meet the following requirements:

4.2.1 Minimum Composition of labor crews for Component 1b and 2

- Composition of a crew 1 team Leader (electrician)
- 1 Electrician
- 1 Qualified SHE Officer
- 1 SHE Rep (must not be the team leader)
- 1 First aider (must not be the team leader)
- 3 Linesmen
- 6 manual laborers

4.3 Labor Requirements: Transmission Reinforcement (Component 1a)

Procurement of the EPC contractors for Component 1a comprises of two Lots with two separate contracts, namely: construction of 132kV and 66kV transmission line, construction of 132 and 66kV substations. However, the two contracts will likely be awarded to two separate contractors or all contracts will be won by a single contractor. The composition of the contractor workers for each contract is illustrated in Table 3 and Table 4, respectively.

Table 1: Package-A: Estimated Manpower for the completion of 132kV Transmission line component of Project

Sl. No.	Activity	Required Teams/Crews (in Nos)	Manpower in each Team/Crew (Nos)	Total No. of Workers	Completion Duration (Days)
1.	Survey Works, RoW clearing, Geo Technical Investigations & etc.	2	5 (4 – L, 1 – F)	10	60
2.	Tower Foundations works, which include excavation, PCC, Reinforcement, RCC and etc.	4	15 (12 – L, 3 – F)	60	365
3.	Erection of Towers including hardware fittings & etc.	3	15 (5 – L, 10 – F)	45	210
4.	Stringing of the conductor, OPGW & etc.	2	15 (5 – L, 10 – F)	30	120
5.	Testing & Commissioning	1	5 (1– L, 4– F)	5	30
TOTAL				150	

NB: L-Local & F-Foreign

Table 2: Package-B: Estimated Manpower for the completion of 132kV Substations component of Project

Sl. No.	Activity	Required Teams/Crews (in Nos)	Manpower in each Team/Crew (Nos)	Total No. of Workers	Completion Duration (Days)
1.	Survey Works, Geo Technical Investigations & etc.	1	5 (4– L, 1 – F)	5	30
2.	Site Levelling, Equipment Foundations (including Transformer), Boundary fence, Control Room Building, Cable trench, Guard room,	3	20 (15 – L, 5 – F)	60	180

3.	Erection of equipment & its' structures, Gantry's, connections between the equipment and Indoor Panels'	2	15 (5 – L, 10 – F)	30	120
4.	Testing & Commissioning	2	10 (2 – L, 8 – F)	20	90
5.					
TOTAL				115	

Table 3: Package-C: Estimated Manpower for the completion of 66kV Transmission line component of Project

Sl. No.	Activity	Required Teams/Crews (in Nos)	Manpower in each Team/Crew (Nos)	Total No. of Workers	Completion Duration (Days)
1.	Survey Works, RoW clearing, Geo Technical Investigations & etc.	1	5 (4 – L, 1 – F)	5	30
2.	Tower Foundations works, which include excavation, PCC, Reinforcement, RCC and etc.	2	15 (12 – L, 3 – F)	30	180
3.	Erection of Towers including hardware fittings & etc.	2	15 (5 – L, 10 – F)	30	180
4.	Stringing of the conductor, OPGW & etc.	1	15 (5 – L, 10 – F)	15	60
5.	Testing & Commissioning	1	5 (1 – L, 4 – F)	5	30
TOTAL				85	

Table 4: Package-C: Estimated Manpower for the completion of 66kV Substations component of Project

Sl. No.	Activity	Required Teams/Crews (in Nos)	Manpower in each Team/Crew (Nos)	Total No. of Workers	Completion Duration (Days)
1.	Survey Works, Geo Technical Investigations & etc.	1	5 (4 – L, 1 – F)	5	30
2.	Site Levelling, Equipment Foundations (including Transformer), Boundary fence, Control Room Building, Cable trench, Guard room,	3	20 (15 – L, 5 – F)	60	180
3.	Erection of equipment & its' structures, Gantry's, connections between the equipment and Indoor Panels'	2	15 (5 – L, 10 – F)	30	120
4.	Testing & Commissioning	2	10 (2 – L, 8 – F)	20	90
5.					
TOTAL				115	

NB: L-Local & F-Foreign

Therefore, the total Project workers to be engaged by this component under the Project is 465 with local workers from local and neighboring communities contributing 252 (54%), and only 213 (46 %) of the workers will be foreigners from outside the country. Furthermore, EEC will also ensure that unskilled Project workers required for component 1a are also recruited from the communities in the Project area as a measure to reduce the impact of labor influx to the Project affected communities.

4.4 Timing of Labor requirements

It is expected that the construction phase of the 132 and 66 kV transmission line and associated four (4) substations will take approximately eighteen (36) months. As a minimum three (3) main crews responsible for the construction of the transmission line and associated substations, including civil works will be deployed onsite at specific periods to undertake the particular tasks, such as land clearing, excavations, tower assembling, erection and stringing. While the Project is estimated to require 465 workers during that period, there will not be 465 workers on-site at any time.

Depending on the specific task there may be 40-95 persons at the Project site at any time only during excavation of tower foundations, where a total of 5 crews with a total of 60 people will be deployed at a given moment. For example, linesmen are required only during the stringing, specific machine operators are only required during the erection of the towers. The construction of the 66kv infrastructure will commence after the completion of the 132kV infrastructure and the same approach will be taken in terms of the phased deployment of the workers on site.

It is further expected that the connection phase of households to the grid and off grid solutions shall take approximately sixty (60) months.

5. REGULATORY FRAMEWORK

Working conditions in Eswatini are governed primarily by the Employment Act 5 of 1980 (as amended) and its subsidiary regulations and orders. This legislation regulates all aspects of employment both in the formal and informal sectors and provides comprehensive guidance on the relationship between employers and employees. It covers provisions related to employment contracts, wages and salary payments, employee benefits, the working environment, hours of work, and various types of leave entitlements.

Furthermore, the Employment Act 5 of 1980 sets minimum standards regarding the age of employment and explicitly prohibits all forms of forced labor, discrimination, and sexual harassment in the workplace.

In this context, the ASCENT Project will comply with and be guided by the following key pieces of labor legislation throughout its implementation lifecycle:

- a) **The Employment Act 1980** provides for the basic conditions of employment with a view of improving the status of workers in Eswatini. The Act makes it mandatory for employers to furnish workers with written particulars of employment, as attached in appendix 1 stating hours of work, wages, leave entitlements, job description, grievance procedure and benefits if any. It is in this legislation where you will find provisions regulating, contracts of employment, Leave entitlements, annual leave, sick leave, maternity and compassionate leave, protection of wages (prohibition against unlawful deductions), retrenchment procedures and fair and unfair reasons for termination of employment.
- b) **The Industrial Relations Act 2000 (as amended)** 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). It outlines the registration and recognition processes of trade unions for workers in exercising their right

of freedom of association as enshrined in the Constitution of Eswatini, 2005. The Act further establishes the 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.

- c) **The Wages Act 16, 1964** 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, building and construction industry. It further mandates the Ministry of Labor and Social Security to issue Wages Regulations regularly, which deals with worker's terms and conditions of each particular industry. EEC will require all contractors to comply with the most current Wages Regulations Order for Building and Construction as issued by the Minister from time to time.
- d) **Factories, Machinery and Construction Works Act of 1972** deals with the regulation of working conditions and the use of machinery at factories and construction sites. Section 19 requires the reporting of accidents in the workplace and therefore any accident during the Project is to be formally reported. Section 20 requires that safety devices not be interfered with, that workers shall use the safety equipment provided and that no person shall do anything that places their safety and that of others at risk. The regulations control health and safety working conditions and the use of machinery at factories and construction works. Regulation 9 requires that machinery be kept in good and safe working conditions and used safely, which is relevant to construction vehicles and other equipment. Regulation 15 requires the training and supervision of inexperienced personnel using machinery which is relevant to the machine operators. Regulation 151 requires that hearing protection be provided and used in noise zones which is relevant for operators of noisy machinery (above 85 decibels). Regulation 152 requires that no person under the influence of alcohol be permitted into the workplace.
- e) **Workmen's Compensation Act of 1983** provides for the compensation and medical treatment of workmen who suffer injury or contract work-related diseases in the course of their employment. Relevant to this Project is section 25, which requires the employer to be insured against liability for work-related injuries. This legislation controls the reporting of workplace accidents and work-related diseases, the provision and payment of medical treatment of injured workers and the compensation of such workers.
- f) **Occupational Safety and Health Act of 2001** The Act ensures the safety and health of individuals at work and within the workplace, as well as the protection of persons outside the workplace from hazards arising from work activities. Section 9 outlines the duties of employers, including providing safe and healthy working conditions, informing workers about workplace hazards, supplying appropriate personal protective equipment (PPE), offering training and supervision, and preventing exposure of non-workers to work-related hazards. Section 11 specifies the duties of employees, requiring them to cooperate with and follow the employer's safety instructions, properly use equipment and safety devices provided, and report any accidents or unsafe conditions to the employer. Section 28 mandates that employers record and report all minor and major accidents, as well as dangerous occurrences, to the Labor Inspector.

- g) **Sexual Offences and Domestic Violence (SODV) Act, 2018** is another recent reform in the country that provides a framework which criminalizes and imposes harsher fines and imprisonment for sexual harassment, gender-based violence nationally and prohibit child marriage. Section 48 of the SODV Act 2018, imposes steeper fines of up to USD2400 or 35 years imprisonment with no option of a fine for rape cases which serves as a deterrent for all forms of sexual harassment. To address workplace sexual harassment cases, EEC has developed a Sexual Harassment Policy which applies to all EEC employees and independent contractors.
- h) **Children's Protection and Welfare Act, No. 6 of 2012** is a comprehensive law designed to safeguard the rights, welfare, and protection of children in accordance with the country's Constitution and international child rights conventions. The Act defines a child as any person below the age of 18 and covers a wide range of areas, including protection from abuse, neglect, exploitation, and harmful labor; Under this Act, the minimum age of employment is 15 years, except for light work that is not harmful to the child's health, development, or schooling. Employment of children under 18 in hazardous work or work that interferes with their education is strictly prohibited.

6. OVERVIEW OF LABOR LEGISLATION

In Eswatini, Labor legislation establishes the legal framework for employment relationships, ensuring fair treatment of workers and outlining the rights and responsibilities of both employers and employees. It includes various aspects, including minimum working conditions, safety regulations, and the right to organize and bargain collectively. This section discusses applicable labor legislation in the country which shall govern labor management for ASCENT.

6.1 Basic Conditions of Employment

Below is an overview of the key aspects of national laws with regard to basic conditions of employment.

6.1.1 Age of Employment

Although the age of employment in Eswatini differs, the Project will only engage a person at the minimum age of eighteen (18) and this will be enforced at recruitment. Consultants/contractors will be required to verify the age of all workers. This will require workers to provide official documentation, which could include a birth certificate, national identification card, and passport. If a child under the minimum age is discovered working on the Project, the case will be reported to the police and measures taken to immediately terminate the employment or engagement of the child in a responsible manner, taking into account the best interest of the child

6.1.2 Working hours

Employees shall work normal regulated hours as stipulated in the Wages regulation/Government gazettes. Similarly, overtime (planned or unplanned) shall be in accordance with these regulations. Contractors shall be expected to report on hours worked and overtime as part of the progress reporting.

6.1.3 Payment of Wages and deductions

A contract of employment will determine the form and amount of remuneration as per job title and responsibilities. An employer shall not pay an employee a salary below the minimum wage calculated at a rate not less than that specified in the regulation of wages as per the requirements of the Wages Act, 1964. Remuneration will be paid monthly at most. The employer may deduct from the workers' remuneration any amounts due to the employee in respect of any tax, Eswatini National Provident Fund (ENPF) and any other deductions the employer is required to deduct from the wages of an employee under any law. The total payment amount which may be deducted from the wages of the employee shall not in any period exceed one-third of the wages due to the employee in respect of that pay period.

6.1.4 Payment of Overtime

An employee, other than a watchman shall be paid for overtime worked at the following rates;

Table 5: Payment of Overtime

No.	Type of Employee	Days	Overtime Hours	Overtime Rate	
1.	Contractor workers	Monday to Friday	In excess of 9 hrs. (excl Lunch hr.)	1.33 before midnight	2.0 after midnight
		Saturday	Up to 1pm	1.5 before midnight	2.0 after midnight
		Sunday & Public Holidays	All day	2.0	
1.	Direct Workers	Monday to Friday	In excess of 8 hrs. (excl Lunch hr)	1.5 before midnight	1.5 after midnight
		Saturday	All day	1.5 before midnight	2.0 after midnight
		Sunday & Public Holidays	All day	2.0	
2.	Watchman	Public Holidays	All day	2.0 after midnight	
		Monday to Sunday	In excess of 12 hrs. 2.0	2.0	

6.1.5 Public holidays

Every employer shall give every employee in his/her employment paid holidays. The following shall be public holidays with full pay; Ascension Day, Independence Day, Good Friday, Christmas day, Mhlanga (Reed dance) day, king's birthday, Incwala day, Easter Monday, May/Workers Day, national flag day, national secondary elections day, New Year's Day and Lutsango day and as gazette from time to time.

6.1.6 Leave days

- a) Annual leave

In each year of continuous employment, an employee shall be entitled to a minimum of twelve (12) days paid leave of each completed year of employment. An employer and its employee(s) may agree where it appears to them to be suitable, or convenient, on time or period in which annual leave is to be taken.

b) Sick leave

An employer shall give an employee sick leave, after three months of continuous employment and subject to the production of a medical certificate signed by a medical practitioner. In each year an employee shall be eligible to a maximum of fourteen (14) days on full wages and thereafter to a maximum of fourteen (14) days on half wages.

c) Maternity leave

Every female employee, whether married or unmarried, who has been in the continuous employment of her employer for twelve months or more shall be entitled to twelve weeks maternity leave with at least one-month full pay. In addition, she shall be entitled to a one-hour nursing break with pay per day, three months after maternity leave.

d) Compassionate leave

Table 6: Compassionate leave breakdown

No.	Type	Working days
1.	Widow	30
2.	Widower	7
3.	Natural Father/mother	7
4.	Biological siblings	7
5.	Natural Child	7
6.	Any other relatives	Employers' discretion
*Employer not obligated to pay compassionate leave days		

6.2 Terms and Conditions of Employment

6.2.1 General Provisions (Applicable to All Project Workers)

All Project workers including direct, contracted, community, and primary supplier workers shall be employed and managed in compliance with the Employment Act No. 5 of 1980, ESS2 and ESS4

a) Employment and Age Requirements

All workers must have formal employment contracts issued in accordance with the Employment Act No.5 of 1980. Only persons above 18 years of age shall be employed. Contractors and suppliers must provide documentary proof of age (e.g., ID, passport, or birth certificate) for all workers. Foreign workers must possess valid work permits, with details submitted to the PIU prior to commencement of work.

b) Working Hours, Breaks, and Leave

Maximum working hours shall not exceed the limits set out in individual employment contracts and national law. Workers shall receive a 60-minute break after every 5 hours of continuous work. Leave entitlements shall be in line with contractual terms and at least equal to the minimum provided by law.

c) Training and Induction

All workers shall receive Occupational Health, Safety, and Environmental (OHS) induction and job-specific hazard awareness training before beginning work. Specialized workers (e.g., equipment operators, those working at heights) must hold competence certificates. Equal training opportunities will be provided to all workers, without discrimination on the basis of gender or any other factor. Toolbox talks and refresher sessions shall be conducted regularly to reinforce OHS awareness, including SEA/SH prevention, HIV/AIDS, STI, and public health emergency awareness.

d) Personal Protective Equipment (PPE)

All workers shall receive appropriate PPE at no cost, based on their job requirements. PPE shall be replaced annually or as required due to wear or damage. Workers shall be trained in the use, care, and maintenance of PPE. Training records will be maintained by the employer or responsible contractor.

e) Code of Conduct and Non-Discrimination

All project workers shall sign a Code of Conduct (CoC) emphasizing ethical behaviour, non-discrimination, and zero tolerance for sexual exploitation and abuse/sexual harassment (SEA/SH). The Project Coordinator, reporting to the General Manager (Research and Development), shall ensure HR policies uphold equality and prevent discrimination.

f) Grievance Redress Mechanism (GRM)

Workers shall be informed of the grievance redress procedures during recruitment and induction. Grievances may be raised without fear of retaliation and will be addressed promptly and transparently in a language understood by the complainant including the allowance and acceptance of anonymously reporting grievances. The mechanism shall not restrict workers' access to judicial or administrative remedies. Information on reporting SEA/SH and other grievances will be shared during induction, toolbox talks, and via internal bulletins. Complaints related to SEA/SH may also be lodged confidentially through the EEC Social Standards Office.

6.2.2 Additional Provisions for Contracted Workers

Contractors must submit to the PIU a list of all workers employed for the Project with proof of employment and age verification. Work commencement shall occur only after:

- Toolbox training on OHS, hazards, and PPE usage is completed.
- All required PPE and tools are procured and provided at no cost.

Each contractor shall:

- Implement a SEA/SH policy and grievance procedure, reviewed and approved by the Social Standards and GBV service providers prior to mobilization.
- Ensure all vehicles and machinery used on the Project have valid registration, insurance, and roadworthiness certificates.
- Sensitize all workers on the Project GRM and means of access.

6.2.3 Additional Provisions for Community Workers

Community workers will be recruited under formal contracts regardless of the engagement period and receive the same entitlements and protections as other Project workers. They will also participate in community awareness programs on health and safety, gender-based violence (GBV), HIV/AIDS, and communicable disease prevention.

6.2.4 Additional Provisions for Primary Suppliers

All primary suppliers must demonstrate sound environmental and social management practices consistent with national law, ESS2, and ESS4. The PIU shall assess suppliers' compliance with these standards, including adherence to paragraphs 39–42 of ESS2. Supplier contracts will include specific clauses requiring implementation of worker safety, non-discrimination, and CoC requirements. Any overtime due to emergencies shall be documented, with measures taken to ensure adequate rest and recovery.

6.3 Occupational health and safety (OHS)

The laws of Eswatini make for provisions on Occupational Health and Safety and apply to both directed and contracted workers, including foreign workers. The overview below provides key departments under the ministry of labor and social security tasked with ensuring compliance with all labor requirements. The section also includes other laws and regulations which relate to requirements set out in ESS2, paragraphs 24 to 30.

The overall responsibility of the Department of Labor is the development and administration of labor market policy and labor law in conformity with international labor standards and the national Constitution. Table below provides an overview of the relevant departments within the Ministry of labor and Social Security.

Table 7: Summary of relevant sections and units within the Department of Labor

Section/ Unit	Function
Industrial Relations Unit	• Registration of Trade Unions and Employers organization • Receiving Annual Returns and financial statements from employers and workers organizations • Registration of retrenchments, lay-offs and Short-time • Conduct tripartite training on Industrial Relations • Scrutinize Works Council Constitutions • Intervene before a dispute is reported • Conciliate on Labor disputes where requested
General Labor Inspectorate Unit	• Educate, advice and counsel Employers and Workers on Labor law and its application

	• Conduct routine, complaint and special labor inspections in all places of employment • Conduct follow up labor inspections
Occupational Safety and Health Inspectorate Unit	• Conduct regular Occupational Safety and Health inspections • Educate advice and Counsel Employers and Workers on Labor Law and its application. • Conduct Boiler inspections • Conduct Pressure Vessel inspections • Conduct Hoists and Elevator Inspections • Issue Factory Permits • Issue Improvement Notices • Issue Prohibition Notices
Statutory Bodies and International Affairs Unit	• Submit reports on Application of International Standards • Submission of International Labor Organization's instruments to Competent Authorities • Answer ILO queries and questionnaires • Provide Secretarial duties to Wages Councils • Review wages and conditions of employment in all Wages Councils • Provide Secretarial duties to the Labor Advisory Board and Social Dialogue committee
Workmen's Compensation Unit	• Registration of all reported injuries on duty cases • Computation of Workmen's Compensation • Secretariat of the Workmen Compensation and Pneumoconiosis Medical Board • Locating dependents of deceased workmen • Resolving Workmen's Compensation disputes • Educate people on the application of the Workmen Compensation Act.

7. ASSESSMENT OF KEY POTENTIAL RISKS

A big portion of the approximately 132 kV and 66kV transmission shall be constructed on the mountainous part of the Manzini and Hhohho region. Construction of the transmission line includes activities such as clearance of the right of way including cutting trees and high vegetation, construction of new access roads (where required), earthworks and construction of foundations, erection of towers, stringing of conductors, etc.

On the other hand, the distribution network reinforcement and electricity access typically include activities such as excavation of holes to plant wood poles for distribution lines, stringing of conductors, installation of distribution transformers, test and cold commission of the distribution line, connection of households for access to electricity, installation electricity consumption meters, testing the connections,

The main labor risks associated with the Project have been assessed and determined as described below table

Table 8: Labor risks and mitigation measures

Potential Risks	Mitigation Measures	Monitoring Actions	Responsible for monitoring compliance
1. Labor Risks			
Language Barrier due to hiring of foreigners with specialized skills to work with unskilled labor who are locals speaking local language only.	Contractors will be required to have or provide an interpreter for all sites with foreigner workers to ensure clear communication and understanding of instructions on site to reduce misunderstandings that could lead to accidents.	• Number of interpreters employed through monthly employee list. • Regular site visits • Weekly Toolbox talks registers	PIU
Exploitation through unlawful contract conditions (giving one month contract for continuous work	No worker shall be hired on a contract shorter than three months. Any request for contracts less than three months shall be submitted for approval to the client.	• Social Audits • Environmental Compliance Officer (ECO) audits	PIU
Exploitative wages due to desire to get jobs	• Project workers shall be paid monthly as required by national labor laws and the requirements of the principle of equal pay for equal work • Minimum wage shall not be lower than the minimum wage established by the periodic Government gazettes. • Deduction allowed under the law shall not exceed 33% of their salary as stated in the Employment Act, 1980, section 56, 4(c). • Employees shall all be provided with pays slips monthly	• Quarterly morning of Employment Contracts • Monthly review of Salary pay-slips records	PIU
Grievances related to SEA/SH	• Sensitize and train all Project workers on SEA/SH risks) and ensure that they understand all risks and sanctions before commencement of works. This includes sensitizing Project workers on the basics of GBV, including SEA/SH concepts and its effects on society as stated in the Sexual Offences and Domestic	• The number of workers trained and sensitized on GBV related issues must cover all workers • Percentage of workers who signed codes of conduct	PIU

Potential Risks	Mitigation Measures	Monitoring Actions	Responsible for monitoring compliance
	Violence Act, 2018 and other laws. Topics that shall be discussed include understanding and avoiding gender-based violence, sexual offences, the legal consequences for committing GBV and other sexual offenses, the negative impact of GBV on survivors and their communities, and on community health and safety generally, including in relation to transmission of communicable diseases such as HIV/AIDS and Sexually Transmitted Infections. In addition, understanding prohibited conduct in the workplace, applicable sanctions and how to report misconduct • Ensure that all Project workers sign codes of conduct addressing SEA/SH and outlining applicable sanctions • Ensure workers are aware they can report grievances anonymously and issues shall still be addressed accordingly. • Implement GRM redress mechanism with multiple entry points, safe and confidential complaint procedures for SEA/SH incidents, including specifically on ensuring a survivor centered response and provision of multiple accessible, confidential and safe channels for GBV survivors to submit complaints and access support as well as appropriate response and information sharing protocols with service mapping results, psych-social and legal services	• Percentage of SEA/SH complaints referred to support services • Percentage of SEA/SH complaints must be resolved within the prescribed timeframe under the grievance mechanism • Average timeframe for resolving SEA/SH complaints • Quarterly monitoring of Number of GBV sensitization sessions held and number of workers who attended each session. • Monthly resolved SEA/SH reported anonymously.	
Labor Influx	• There will be no dedicated accommodation camps, foreign labor (component 1a) will be accommodated in rental flats under the supervision of the contractors Project Managers, whilst project workers for	• Quarterly monitoring of Number of workers sensitized on HI/AIDS and GBV related issues	• -PIU is ultimately responsible for ensuring all

Potential Risks	Mitigation Measures	Monitoring Actions	Responsible for monitoring compliance
	component 1b and 2 will be accommodated in the community facilities/NCPs including rented homesteads and EEC shall ensure that all workers comply to the Code of Conduct. - Contractors will be required in the bidding documents to recruit all unskilled labor from the local communities unless such labor is not available among the local communities - Every Project worker will be required to sign the Code of Conduct (see Appendix 1 on the guideline on Code of Conduct) before the commencement of work which includes provisions to address the risk of increased HIV/AIDS infections, SEA/SH, as well as communicable diseases, including public health emergencies . The Code of Conduct governs both on-site behaviors (with colleagues) and conduct in the community and also outlines applicable sanctions for misconduct. Relevant training will be provided to workers, such as induction and Friday toolbox talks outlining expected conduct and local community values.	Effective Understanding and sensitization among local communities and Project workers on the risks/impacts of SEA/SH, HIV/AIDS and any Public health emergencies and Project measures to mitigate these risks.	- contractors/sub-contractors and primary suppliers comply with these requirements. -Contractors
Poor working conditions (Unsafe work environment, lack of workers' rights)	Construction sites must provide a safe and healthy working environment with hygienically clean sanitation, drinking, eating, and washing facilities, with adequate potable water, well-ventilated and with clean and culturally appropriate sanitary, changing and washing facilities that are separate for males and females. The Project will ensure that all such facilities for males and females are safe, secure, designated and well-lighted and to be lockable from inside	- Presence of construction site offices with an adequate supply of basic amenities - Number of issues raised and addressed - Job observations done quarterly - Contractors' monthly reports	- PIU - Contractor SHE representative

Potential Risks	Mitigation Measures	Monitoring Actions	Responsible for monitoring compliance
	• Construction sites must be accessible for people living with disabilities to maneuver around without any difficulties by constructing ramps on buildings • Project workers will be provided with facilities appropriate to the circumstances of their work, including access to canteens, hygiene facilities and appropriate areas to rest. ○ Projects workers working outside of their usual place of work by 5 km shall be provided with travel and subsistence allowance by their employers • Construction sites must be cleaned and organized daily with appropriate safety and information signage/markings in place, for example, signage for smoking area, assembling point etc. • Adequate quantities of potable water must be provided at all Project work sites. • All Project workers will be provided with adequate periods of rest per day (break and lunch), sick leave as required by national law and World Bank policies. • Proper storage of hazardous and nonhazardous material and equipment and removal of scraps and debris from the construction site. Appropriate methods should be employed when storing and disposing of any types of waste • Supply of first aid boxes at each construction site, which will be administered to workers on site during any accidents. Contents of the first aid box are stated in appendix 3.		

Potential Risks	Mitigation Measures	Monitoring Actions	Responsible for monitoring compliance
	• Conduct risk assessments for each activity to be undertaken and create awareness around Project risks to both workers and direct communities. • Immediate root cause analysis of serious accidents or fatalities to ensure that these do not occur again by coming up with mitigation measures such as providing training and onsite demonstrations on the use of specific tools.		
Forced Labor, including Labor Trafficking, and Child Labor	• Minimum age of Project workers including community workers eligible for any type of work under the Project is set at 18 years, as set out in this LMP, ESCP, ESMF • Design and implement HR policies that comply with Eswatini's Labor law and ESS2 requirements • Procurement will ensure that no forced labor exists in the Project by developing terms of reference for all engaged in the Project and gathering documents and appropriate proof/evidence. In case forced or child labor is found in the Project, the matter will be reported to the police as this is a criminal offence and the child shall be immediately removed, taking into account the best interest of the child. • All contracts shall have contractual provisions to comply with the minimum age requirement including penalties for non-compliance. The PIU will conduct spot checks and also verify the national identity cards of all employed in the Project by ensuring that all contractors submit labor compliance files, which entail all this documentation	• Signed documentation from each CLO confirming agreement that the community labor is provided on a voluntary basis. • Absence of minor within the workforce checked monthly • Attach national Identity documents as part of the contract • Meeting registers/ records with attached minutes. • Monthly records of engaged employees and their contracts	PIU

Potential Risks	Mitigation Measures	Monitoring Actions	Responsible for monitoring compliance
	Awareness-raising sessions will be conducted with both the contractors and communities to sensitize them on the prohibition and negative impacts of child and forced labor. This will be conducted during consultation meetings for communities and also monthly during the toolbox talks for contractors		
Community grievance (community safety, traffic and noise complaints as a result of the construction works)	- Develop, train and implement workers code of conduct, including in relation to SEA/SH prohibited conduct and applicable sanctions. - Provide each worker with a written copy of the Code of Conduct in a language and format that he/she easily understands and monitor adherence. - Develop and train workers on grievance procedure to address community concerns. - Provision of resources for the functioning of the grievance redress procedure, including safe and confidential procedures for management of SEA/SH complaints. - Provide all local authorities and leaders of Project affected communities with copies of the grievance procedure and provide regular awareness-raising sessions for all members of such communities on the content of the Code of Conduct.	- Availability of a copy of a grievance procedure of which is given by Project management to each chieftdom that is clearly defined and understood by local authorities - Percentage of worker which have signed code of conduct - Percentage of SEA/SH complaints referred to support services - Percentage of SEA/SH complaints resolved in prescribed timeframe under GM - Average timeframe for resolving SEA/SH complaints - Number of anonymously reported cases monthly - Number of complaints related to traffic, safety, noise or any other activities of the Project workforce	PIU
Inadequate provision of PPE	Provide and train workers on proper usage of PPE	Adequacy of PPE is provided to Project workers according to their	PIU

Potential Risks	Mitigation Measures	Monitoring Actions	Responsible for monitoring compliance
	• Provide annually or as and when necessary adequate PPE that is appropriate for his/her Project duties/responsibilities. • Ensure that all OHS measures, including the provision of PPE, are undertaken in accordance with the World Bank General Environmental Health and Safety Guidelines on Occupational Health and Safety (EHSGs)	work duties and Project safety circumstances. • number and percentage of workers given PPE • Percentage and number of workers using PPE provided to them • Number of incidents and accidents and relationship to PPE	• Contractors/sub-contractors/primary suppliers
Inequality and Discrimination during recruitment and employment against women, and other members of vulnerable groups (including persons with disabilities, LGBTI, low-income persons, etc.)	• Employment of all workers shall be based on the principle of equal opportunity and fair treatment and there shall be no discrimination with respect to disability , gender or remuneration. • The PIU, all contractors/sub-contractors, and primary suppliers, and all workers engaged/employed in relation to the Project, including community workers, will also be required to comply with the Employment Act requirements on gender equality in the workplace which will include the provision of maternity leave, nursing breaks and sufficient, suitable, secure and lockable toilet facilities separate for men and women workers. • Contractors/sub-contractors and primary suppliers will be required to create an enabling work environment that establishes and implements a Zero Tolerance policy against sexual exploitation and abuse or sexual harassment in the recruitment and retention of skilled and unskilled female workers by applying fair recruitment practices. This will include	• Total number of workers • Number of women employed • Number of people living with disabilities employed • Types of employment assigned to women in the Project	• PIU • Contractors/sub-contractors/primary suppliers

Potential Risks	Mitigation Measures	Monitoring Actions	Responsible for monitoring compliance
	sensitizing workers on their rights, developing and implementing a sexual harassment policy		
Overtime/ excessive working hours without compensation and breaks	- Put in place HR policies and procedures which include mandatory requirements with respect to the minimum wage, minimum age, working hours, contracting terms, leave, equality, diversity, collective bargaining, working terms and conditions - Any work undertaken beyond normal working must be compensated per the applicable Wages regulations – Government gazettes.	- Availability of HR Policy - Random sampling of workers who understand their terms and conditions of employment	PIU
2. Community Health and Safety			
Security Personnel	- Ensure that contractors for the security personnel comply with all terms and conditions of employment under national law and in relation to this LMP/ESS2. - Ensure all security measures are controlled by supervisors. - Ensure that all security personnel are adequately trained regarding the use of force and appropriate conduct toward other project workers and affected communities - Require that all security personnel are adequately trained to understand the project Code of Conduct and sign the project Code of Conduct as a condition for their employment for the Project. - Ensure that all project security personnel receive adequate quarterly training on the risk of GBV/SEA/SH and on the terms of the project GBV/SEA/SH Action Plan.	- Monitor all terms and conditions of employment of all project security personnel to ensure these comply with national law and the terms of this LMP/ESS2. - Assess on a quarterly basis the number of project grievance submissions, including regarding GBV/SEA/SH, related to incidents involving security personnel - Assess the timeliness and adequacy of project grievance mechanism resolution of such complaints - Percentage/number of project security personnel trained on the terms of the Code of Conduct and	PIU Contractors

Potential Risks	Mitigation Measures	Monitoring Actions	Responsible for monitoring compliance
	• Ensure that all Security Personnel are properly trained on appropriate use of force in line with national law and the provisions of ESS4. • Make reasonable inquiries to verify that the security personnel retained for the project are not implicated in past abuses. • Rotate all security personnel on a quarterly basis to minimize opportunities for collusion and corruption.	signed the Code of Conduct as a condition of employment for the project • Number of training sessions and number of security personnel who attended training sessions on GBV/SEA/SH and the project GBV Action Plan.	
Transmission of infectious/communicable diseases (Public health emergencies, -19,HIV,STI's)	• Awareness-raising and sensitization of workers on HIV/AIDS-related issues including SEA/SH related risks and any public health emergencies Public Health Emergencies by the PIU in collaboration with relevant service providers. • Distribute condoms free of charge. • Provide free voluntary HIV/AIDS testing for all workers engaged in the Project • Train workers on Public Health Emergencies and implement social distancing in accordance with national law, and WHO and World Bank guidance.	• Workers wearing appropriate PPE including face shields and masks • Monthly number of workers provided with HIV/AIDs testing • Monthly number of workers sensitized and trained on HIV/AIDS-related issues including Public health emergencies.	• PIU • Contractors/sub-contractors/primary suppliers
Inadequate compensation for accidents victims	Awareness-raising on workmen's compensation policy	• Number of awareness sessions conducted with the total number of workers sensitized. • Monthly review of lost time injury register to determine disabling incidents. • Monthly follow up on compensable incidents with relevant stakeholders.	• PIU • Contractors/sub-contractors/primary suppliers

Potential Risks	Mitigation Measures	Monitoring Actions	Responsible for monitoring compliance
		Monthly review of detailed incident records (medical bills, transport, lost days, etc.)	
Gender-based violence, including Sexual exploitation and abuse, workplace sexual harassment and child abuse/exploitation	- Sensitize workers and community members on SEA/SH and related issues prior to commencement of works. - Prior to construction, conduct induction sessions with contractor workers and clarify the SEA/SH impacts and effects on society and how these also influence the spread of HIV/AIDS related sicknesses including new infections through organized group sessions - Provide ongoing quarterly training/sensitization sessions, for all Project workers on SEA/SH and HIV/AIDS and minimizing transmission among workers and between workers and local communities. - Contractors will develop, sensitize and implement a Sexual Exploitation and Abuse/Sexual Harassment policy. Contractors will need to develop a SEA/SH policy stating how they will handle all SEA/SH cases internally and how they will mitigate risks related to SEA/SH, including responding to SEA/SH incidents and ensuring appropriate and timely service referrals. This will be done to raise awareness and also to respond in cases where such offences are committed.	- Number of bi-monthly SEA/SH and HIV/AIDS training sessions undertaken and the number of workers who participate/attend each session. - Monthly number of HTS services provided to workers and Project affected community members - Quarterly review of percentage of SEA/SH complaints referred to support services - Percentage of SEA/SH complaints resolved in prescribed timeframe under GM - Average timeframe for resolving SEA/SH complaints	PIU

8. ACCOMMODATION REQUIREMENTS FOR COMPONENTS 1B AND 2

Accommodation identification for components 1b and 2 will be coordinated by group scheme chairpersons in collaboration with the MNRE. EEC will conduct a pre-occupation assessment of all proposed facilities to confirm compliance with: National laws on safety, health, and hygiene; ESS2 paragraph 28, and ESS4. EEC will consult local community members, women's groups, such as Rural Health Motivators, as well as the Chiefs' inner council representatives, regarding the provision of accommodation to Project workers, as it is usually done when seeking accommodation for other EEC projects during implementation.

The EEC will implement all measures to mitigate the risk of SEA/SH and transmission of HIV/AIDS, as well as any public health emergencies at that time. The table below, shows Constituencies under each region of the project area:

Table 9: Eswatini's four administrative regions and 59 Tinkhundla constituencies

NO.	HHOHHO REGION	MANZINI REGION	SHISELWENI REGION	LUBOMBO REGION
1.	Lobamba	Ludzeludze	Sandleni	Matsanjeni North
2.	Madlangemphezi	Ekukhanyeni	Zombodze Emuva	Mpolonjeni
3.	Ndzingeni	Mkhiweni	Somntongo	Siphofaneni
4.	Mayiwane	Mtfongwaneni	Matsanjeni	Dvokodweni
5.	Ntfonjeni	Mafutseni Lamgabhi	Sigwe	Lugongolweni
6.	Pigg's Peak	Mhlambanyatsi	Shiselweni 1	Lomahasha
7.	Motshane	Mangcongco	Gege	Lubuli
8.	Nkhaba	Ngwempisi	Maseyisini	Sithobelweni
9.	Hhukwini	Mahlangatsha	Kubuta	Nkilongo
10.	Maphalaleni	Manzini North	Mtsambama	Mhlume
11.	Mhlangatane	Manzini South	Nkwene	Gilgal
12.	Timphisini I	Nhlambeni	Shiselweni	
13.	Mbabane West	Kwaluseni	Hosea	
14.	Mbabane East	Lobamba Lomdzala	Ngudzeni	
15.	Siphocosini	Ntondozi	Kumethula	
16.		Phondo		
17.		Nkomiyahlaba		

8.1 Types of accommodation

Accommodations options that have been identified for the project include Neighborhood Care Points (NCPs), Rural Homesteads as well as Rental Flats. The accommodation from Rental flats and rural homesteads have been considered to be the most practical option. All contractors shall be expected to sign a lease agreement where they are accommodated and submit to the PIU for

records. A sample has been attached to the Appendix of the LMP. Measures to ensure these accommodation options will meet the provisions of ESS2, including ESS2 paragraph 2.

8.1.1 Neighborhood Care Points (NCPs)

NCPs are multipurpose community facilities used for various social and health services. Each can accommodate up to 15 workers, subject to availability. As community facilities, their use will depend on current community needs. Inspections will be conducted prior to worker occupancy and the EEC will assess each NCP to ensure compliance with ESS2 and ESS4.

8.1.2 Rural Homesteads

Typical rural homesteads in Eswatini consist of one or two-room flats in addition to the main house. To mitigate SEA/SH risks, workers will be accommodated in detached flats separate from family dwellings.. EEC may authorize the use of rural homesteads as an alternative, provided they meet the requirements. .

8.1.3 Rental Flat

Rental flats are described as flats or apartments that are by design for rental to general public in that area. Due to different development projects in communities, community members have invested in rental flats. The project shall consider these especially for foreigner workers as the first most preferred accommodation option for them. Contractors will pay rental fees in line with local market rates and submit corresponding agreements to the PIU.

8.1.4 Accommodation checklist

An accommodation checklist for the project has been developed and is attached in Appendixes of this LMP. To achieve this, the EEC will ensure that all the different rooms to let accommodation meet the following requirements and that all contractors and subcontractors utilizing such “rooms to let” accommodation adhere strictly to the following:

Table 10: Requirement for all type of Accommodation

No	Requirement for all type of Accommodation
1.	Ensure physical separation of worker from household lodging such as separate flats/structures apart from the main house, independent washroom facilities / water supply for workers so they do not ask / need to use household facilities.
2.	Put in place measures to ensure lodging facilities are lockable and secure (both for workers and households), separate lodging for female and male workers (they should be segregated in different houses), and
3.	Ensure transport to worksites to avoid possible transport demands/expectation demands by workers to households hosting them.
4.	The project shall ensure that rental payments are made directly to households by the contractor and signed lease agreement submitted to the client
5.	Ensure explicit language in the project Code of Conduct and other project documents, prohibiting SEA/SH and any relations with community members.

No	Requirement for all type of Accommodation
6.	EEC will undertake a thorough acceptability assessment of each private home to be used for worker accommodation, prior to accommodation of any workers at the home, to confirm acceptability in line with national law, WB ESS2 and ESS4, and with IFC/EBRD Guidelines on Labor Influx and Worker Accommodations.
7.	The ASCENT Contractor's SHE REP shall also conduct monthly inspections and submit report and update SHE files accordingly.
8.	Workers will use mobile ablution systems segregated for male and female workers in situations where there are not enough ablution facilities to be used by the contractor in the household premises.
9.	EEC will ensure that there will always be an adequate and accessible supply of stationery and/or mobile water containers for drinking, cooking and bathing purposes.
10.	Conduct awareness raising sessions for household members on GBV awareness during accommodation inspections involving either the contractor, the SHE Rep, director and supervisor depending on who is available on-site during inspections
11.	GBV/SEA/SH, HIV/AIDS, and Public Health Emergencies sensitization meetings will be conducted by the SEA/SH service provider, prior to commencement of work for all workers involved with Subcomponents 1b and 2.
12.	The social standards officers shall further write inspection reports which state if accommodation is approved or not or approved with recommendations to be first fully done before workers can move in.

9. INSTITUTIONAL ARRANGEMENTS FOR THE IMPLEMENTATION OF THE LMP

The MNRE provides overall oversight for the Project, which will be implemented by the EEC with support from the Ministry. To strengthen coordination and ensure ownership, EEC has established a Project Implementation Unit (PIU) within the company. The PIU is composed entirely of EEC staff and includes the Project Coordinator, Procurement Officer, Financial Management Officer, Environment Officer, Project Engineer, Safety Officer, Social Development Officer, Security Officer, IMS Officer, and Survey and GIS Officer.

9.1 Roles and Responsibilities of the PU

The primary mandate of the PIU is to coordinate and ensure the effective implementation of the Project. Details of staff responsibilities and oversight mechanisms are provided in the Project Environmental and Social Management Plans (ESMPs). EEC's PIU holds overall responsibility for managing all aspects of the Labour Management Procedures (LMP), particularly ensuring contractor compliance. EEC will integrate all LMP requirements into the procurement process for works and address them during contractor and workforce induction and orientation. The PIU will be responsible for the following;

- Implement this LMP in relation to all direct workers and ensure that all contractors/sub-contractors and primary suppliers are implementing this LMP in relation to all workers they engage/employ in relation to the Project.
- Monitor that contractors are meeting obligations towards contracted and sub-contracted workers as included in the general conditions of the contract and in line with ESS2 and the national labor laws.

- Monitor that occupational health and safety standards are met at workplaces in line with national occupational health and safety legislation and occupational health and safety guidelines
- Ensure that the grievance mechanism for Project workers is established in line with ESS2 and monitor its implementation
- Monitor the implementation of the workers' code of conduct.

Table 11: PIU responsibilities

Position	Responsibilities
Project Coordinator	• Oversee the project team on the overall day-to-day management and coordination and implementation of the subcomponents of the Project. • Closely liaise with the Task Team from the World Bank and other Stakeholders (i.e. EEC departmental heads, relevant Ministries and parastatal agencies).
Social Officer	• Within the SHERQ department, it reports to the SHERQ Manager and support all social activities of the Project and coordinate with the PIU and stakeholders assigned to implement components 1b and 2. • Shall hold the responsibility of ensuring that the LMP and SEP are followed in Project implementation, remains with the PIU who will continuously update these documents throughout the Project life cycle.
Environmental Officer	• Within the SHERQ department, reporting to the SHERQ manager will lead the environmental activities of the Project and coordinate PIU and stakeholders assigned to implement the subcomponents. primarily be responsible for ensuring that • Ensure project activities avoid and minimize negative environmental impacts; and where they cannot be avoided, that impacts are identified, and the necessary mitigation measures are developed and implemented following the relevant national legislation as well as the World Bank policies.
Safety, Health Officer	• Shall be responsible for the development, implementation and monitoring of the Project Specific OCHSIP, compliance to national legislation, World Bank Environmental, Health, and Safety guidelines. • Ensure implementation of the LMP in line with the World Bank requirements.
Procurement Officer	Shall work with the Environment and Social Development Officers to ensure that all the Procurement documents adequately reflect environmental and social requirements.
IMS Officer	• Shall work with the Environment and Social Development Officers to ensure that all the Procurement documents adequately reflect environmental and social requirements. • Shall ensure alignment of project activities with EEC's Integrated Management Systems, including quality, environment, and safety standards. • IMS shall further support documentation control, and continual improvement in line with ISO and ESF requirements as well as conduct internal compliance audits as per EEC internal procedure.
Financial Management Officer	Shall assist the project team to lead the financial management activities of the Project and coordinate with the technical teams and stakeholders assigned to implement the sub-components
Security Officer	• Shall manage site security and supports implementation of measures to prevent and respond to security risks affecting workers and communities.

Position	Responsibilities
	The officer shall also ensure alignment with ESS4, including protocols for managing security personnel and community safety.

9.2 Contractor Responsibilities

- a) Occupational Health and Safety.** Contractors must engage one SSHE (Safety, Social, Health and Environment) representative. The SSHE representative can be any other employee, such as manual labor and linesmen except the team leader. The SHE representative shall ensure day-to-day compliance with the Occupational Community Health and Safety Implementation Plan. This includes ensuring that all workers use appropriate PPE, all tools and equipment are available and operational, and hazard identification and risk assessment are done for the tasks given on the day. Minor incidents are reported to EEC monthly, serious incidents are reported immediately within 24 hours. Minor incidents are reflected in the quarterly reports to the World Bank; major issues are flagged to the World Bank within 48 hours.
- b) Labor and Working Conditions.** Contractors will keep records in accordance with occupational community, health and safety specifications as set out in this LMP. EEC may at any time require records to ensure that labor and working conditions are met. The PIU will review records against actuals at a minimum on a monthly basis and can require immediate remedial actions if warranted such as serious non-conformance. This may include utilizing equipment without following safe work procedures/operations, such as not utilizing a safety harness when working at heights or working on a live chamber without a permit. A summary of issues and remedial actions will be included in quarterly reports to the World Bank.
- c) Worker Grievances:** In line with the provisions of ESS2 paragraphs 21-23, the PIU will ensure that direct and contracted workers have a worker-specific grievance redress procedure in place to raise workplace concerns, including workplace sexual harassment. EEC's procedures currently in place will remain for the PIU. All workers will be informed of the grievance procedure available to them at the time of recruitment. Measures will be put in place to ensure that the grievance procedure is accessible to all Project workers and that measures are in place to protect workers against reprisal for its use including acceptance of anonymous reporting of issues. Contractors will be required to present a worker grievance redress procedure that responds to the minimum requirements in this LMP and also the requirements of the Industrial Relations Act, 2000. The PIU's Social Development Officer will review contractor's grievance records monthly. Where worker concerns are not resolved, the national system will be used as set out in the Industrial Relations Act 2000. The PIU will provide quarterly reports on the number of grievances resolved to the World Bank.
- d) Additional Training.** Contractors are required to, at all times, have a qualified safety officer on board. The ASCENT PIU is responsible for ensuring that all contractors/sub-contractors provide at regular intervals, adequate OHS and other workplace training to the workforce under the respective contractor's/sub-contractor's control/direction in relation to the Project. The contractor's safety officer will provide toolbox safety talks

to Project workers. EEC will communicate and conduct awareness-raising sessions, every three months, on the risks associated with labor influx and how to mitigate these to all Project workers and communities under the Project continuously. EEC will be responsible for ensuring that each contractor makes its staff available for any training, as well as any additional mandatory training required by EEC, including all OHS Project-related training such as firefighting, first aid, etc.

9.3 Owners Engineer (OE)

The OE shall report to the PIU PM and shall complement the PIU in the supervision of Component 1a of the Project. The OE will work closely with the PIU in ensuring that the Project deliverables are achieved timely and that project management and project implementation capacities are transferred to EEC. The OE shall support the EEC in the following project management functions under component 1a:

Implementation Plan: EEC will prepare a project implementation schedule before project effectiveness. The OE shall within thirty (30) days of its assignment review and update EEC's implementation schedule of the Project.

Monitoring Project Progress: The OE shall supervise and monitor the project implementation progress and report to EEC details of any aspect that may threaten the progress of the works.

Contract Management: The OE shall support the PIU in ensuring its contractors' compliance with the terms and requirements of the contracts and delivery of the required goods, works, and services consistent with the terms of the contracts. The OE shall also recommend to the PIU best practices to enforce the contract requirements for the success of the Project.

Monitoring implementation of environmental and social instruments: The OE shall support the PIU in the monitoring and reporting of all environmental and social instruments. The Owners Engineer shall conduct spot checks to verify any non-compliance and communicate this to the Environmental and Social Development officers.

Project Mid-Term and Completion Report: The OE shall assist the PIU in preparing Project Mid-Term and Completion Reports. The project completion report shall be submitted two months before the completion of the consultancy services.

9.4 Third-Party Independent Monitoring Agency

An independent Monitoring Consultant for the environment and social issues will be engaged by the PIU. The independent monitoring consultant shall be responsible for ensuring compliance with approved plans and programs related to environmental and social issues. The independent monitoring consultant will be engaged throughout project preparation and implementation.

9.5 Community Liaison Officers (CLO's)

The duties of the CLO shall include the following;

- Facilitate the smooth liaison between contractors, staff and local residents by maintaining regular contact and networking with communities (located within reasonable proximity to the Project construction site) and other key relevant stakeholders.

- Assist EEC in the identification of potential implementation problems and bottlenecks with regards to both the community and the local government relationships.
- Work with the Social Development Officer, the Project team and in line with the EEC communication strategy and the Stakeholder Engagement Plan to:
- Disclose Project related information to interest groups and people that are affected or likely to be affected by the Project.
- Ensure that communities at construction sites are kept abreast of the Project developments and communication channels remain open with the communities
- Forward questions and grievances related to the Project from the community members and leaders to appropriate authorities including the local authorities such as chiefs or their inner council representatives.
- Provide a familiar and accessible face with whom community members can raise concerns, realize opportunities and resolve grievances.
- Risk and impact mitigation (including managing and resolving local grievances, conflict resolution and mediation);
- Assist in the implementation of the Project GRM in a manner that takes into consideration culturally appropriate traditional local community grievance redress approaches used to resolve grievances at the community level.
- Respond to community concerns by ensuring that they are brought to the attention of the EEC Social Development Officer and to conduct follow-ups to ensure issues are resolved on time to prevent risk and negative publicity to the Project.
- In coordination with the EEC Social Development Officer, provide initial introductory sensitization to local Project affected communities regarding the purpose, scope, and content of the Project Grievance Redress Mechanism (GRM), and the means for accessing it, including by ensuring accessibility and inclusion of the GRM for members of vulnerable groups, including persons with disabilities, and the poorest persons throughout the Project life cycle.

9.6 Support Staff

Additional staffing may be needed during Project implementation. However, EEC has several existing staff who will provide support to the Project. The following offices have been identified within the EEC:

- **GIS Office:** the surveyors have developed many transmission routing options and identified tentative resettlement impacts. It is expected that the office will continue to lend support to the Project Implementation Unit's Social Development Officer regarding the resettlement process.
- **Legal office:** the legal office will assist in the drafting and vetting of Contracts.

- **Outsourcing Office:** will lend support with regard to contracting during Project implementation.
- **Commercial Services:** inspects primary suppliers twice annually and will report to Project Implementation Unit any irregularities.
- **Transport Department:** The EEC Transport Department is responsible for the Management of the fleet allocated to the Project Implementation Unit.
- **GBV service provides:** Likewise, EEC shall partner with GBV service provides in each of the 4 regions to facilitate awareness-raising sessions on SEA/SH including HIV/AIDS related issues and the transmission of communicable diseases such as Sexually Transmitted Infections (STI's) in order to prevent and mitigate the risk of GBV in the Project. The provisions given under this LMP will apply to such consultancies as they will be providing services related to sensitization on GBV and responding to GBV cases.

10. GRIEVANCE REDRESS MECHANISM

In accordance with ESS2, the Project will provide a worker-specific grievance mechanism, which will be a separate mechanism from the Project's Grievance Redress Mechanism, for all direct workers and workers engaged through contractors/sub-contractors.

EEC requires that contractors develop and implement a grievance mechanism for their workforce, including sub-contractors, before the start of works. This will be submitted to EEC as part of their labor compliance files. The workers' grievance mechanism will include;

- A procedure to receive grievances such as comment/complaint form, suggestion box
- The worker grievance mechanism will clearly state how SEA/SH grievance are received and managed to ensure survivor centered approach through confidentiality and multiple entry points.
- Allow and address anonymously reported grievances
- Stipulated timeframes to respond to grievances
- A register to record and track the timely resolution of grievances
- A responsible individual to receive, record and track resolution of grievances

The supervising engineer (Owners engineer) will monitor the contractors recording and resolution of grievances and report these to the EEC in their monthly reports. The process will be monitored by the Social development officer with assistance from the Legal office.

The worker grievance mechanism, which will be in line with the provisions of ESS2, will be described during induction training, which will be provided to all Project workers by their employers. The mechanism will use principles which include workers can freely voice concerns through a transparent and accessible process, complaints are treated confidentially, with no discrimination or retaliation, the mechanism is fair, independent, prompt, and easy to understand,

anonymous grievances are accepted and given equal consideration as well as ensure that management is committed to serious and timely action in response to all grievances.

The Project employee's grievances mechanism will not prevent workers from using the conciliation procedure provided in the Industrial Relations Act, 2000 or other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

d. Contractor Management

Selection of Contractors

The Project will make use of the World Bank Standard Procurement Documents for Works and solicitations of contracts. The PIU after receiving bids from the contractors shall ensure that the contractors are legitimate (including conducting background checks) and have permits according to the Eswatini law, and the necessary professional bodies. These include labor and occupational, health and safety requirements. The PIU shall make reasonable efforts to ascertain that the contractor who will engage contracted workers is a legitimate and reliable entity and able to comply with the relevant requirements under the LMP. Such requirements shall be included in the bidding documents. As part of the process to select the contractors who will engage contracted workers, the PIU may review the following information:

- Business licenses, registrations, permits, and approvals
- Documents relating to the contractor's labor management system and OHS system (e.g., HR manuals, safety program, Sexual Exploitation and Harassment policies); ESHS personnel and their qualification

11. CONTRACTUAL PROVISIONS AND NON-COMPLIANCE REMEDIES

The PIU shall incorporate the agreed labor management requirements as specified in the bidding documents into contractual agreements with the contractor, together with appropriate non-compliance remedies (such as the provision on withholding 10% of the payment to the contractor in case of non-compliance with relevant environmental, social, health and safety requirements; removal of personnel from the works; or lack in the OCHSIP performance security).

Furthermore, the company shall issue a formal notice outlining the areas of non-compliance and the required corrective actions. Should the contractor fail to demonstrate satisfactory improvement within the stipulated time frame, the EEC shall reserve the right to impose a financial penalty, the value of which shall be determined in accordance with the severity and duration of the breach. In the case of subcontracting, the PIU will require the contractor to include equivalent requirements and non-compliance remedies in their contractual agreements with subcontractors.

12. PERFORMANCE MONITORING

The PIU shall dedicate resources and establish procedures for managing and monitoring the performance of the contractor in relation to the LMP. The PIU will ensure that the contract with

the construction and supervision consultants explicitly set out their monitoring responsibility for the contractor's performance on labor and working conditions daily. The monitoring may include inspections, and/or spot checks of project locations or worksites and/or of labor management records and reports compiled by the contractor. Contractors' labor management records and reports that should be reviewed would typically include the following:

- Representative samples of employment contracts and signed Code of Conduct;
- Grievances received from the community and workers and their resolution;
- Reports relating to fatalities and incidents and implementation of corrective actions;
- Records relating to incidents of non-compliance with the national labor law and the provisions of the LMP; and
- Records of the training provided for contracted workers to explain occupational health and safety risks and preventive measures

12.1 Monitoring Performance of Contractors

There shall be a comprehensive database of all primary and secondary contractors for the Project. The database will record a summary of their scope of work, business origins, and a brief profile about the history of compliance to environmental and social standards.

This will contain information of the key suppliers which will be used to monitor the primary supply chain and record results of risk assessments for incidents of child and/or forced labor and significant environmental safety issues. If any issues are identified the supplier will be notified through a non-conformance report to rectify the issue in no more than 7 calendar days. If the condition still exists after 7 calendar days the contractor shall stop all works until the issue is resolved.

Appendix 1: 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 workers)
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

Appendix 2: Contractors SHE File Monitoring Form (EEC)

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 EEC 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 Box: availability and usage of the form,				
19.	Fire extinguisher; valid				
20.	Any other				

EEC SHE Rep

Signature Date compiled

Contractor SHE Rep

Signature Date compiled

Appendix 3: First Aid Box Contents Checklist¹

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.	3-ply surgical masks		2		
18.	Splints-Straight		2		
19.	Triangular Bandages		4		
20.	Wound Cleaner- CENTRIMIDE 1%	100ml	1 Bottle		
21.	Waste-disposal bags		2		

2. Contents should be regularly replenished by appointed first -Aider

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

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

Appendix 4: Code of Conduct for ASCENT

INTRODUCTION:

This Code of Conduct (CoC) is to be followed by all workers, including direct workers, community workers, as well as workers engaged/employed by contractors/sub-contractors and primary suppliers in relation to the Accelerating Sustainable and Clean Energy Access Transformation (ASCENT) in Eswatini (P165660)

The purpose of this CoC is to lay out a framework of mandatory norms, practices, and behaviors that all workers engaged under ASCENT must follow as a condition of employment under the Project. The CoC is a means to prevent and/or minimize social risks within the context of the Project, and each Project worker will be required to review, agree to the terms of and sign this CoC at the time of employment. This CoC addresses a range of environmental and social issues related to Project workers and the workplace area, including, but not limited to, workers' occupational health and safety, community health and safety, including transmission of HIV/AIDS, Public health emergencies PUBLIC HEALTH EMERGENCIES and other communicable diseases, child labor, forced labor and labor trafficking, sexual exploitation and abuse and sexual harassment (SEA/SH) among Project workers and between Project workers and members of local communities, violence against children, and respect for wildlife and related natural resources in the Project area.

The workplace is an environment where unsafe, offensive, abusive, or violent behavior will not be tolerated. The ASCENT is committed to ensuring a work environment that minimizes any negative impacts on the local environment, communities, and its workers, and also where all persons should feel comfortable raising issues or concerns without fear of retaliation.

DEFINITIONS²:

Sexual Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment: Any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment.

SH versus SEA³: SEA occurs against a beneficiary or member of the community. SH occurs between personnel/staff of an organization or company and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. The distinction between the two is important so that agency policies and staff trainings can include specific instruction on the procedures to report each.

Contractor Personnel: employees that have been engaged by EEC's contractors and sub-contractors to work in the Project

Consent: The choice behind a person's voluntary decision to do something. Consent for any sexual activity must be freely given, okay to withdraw, made with as much knowledge as possible, and specific to the situation. Consent must be informed, based on a clear appreciation and understanding of the facts, implications and future consequences of an action. In order to give consent, the individual concerned must have all relevant facts at the time consent is given and be able to evaluate and understand the consequences of an action. The individual also must be aware of and have the power to exercise the right to refuse to engage in an action and/or not to be coerced (i.e., by financial considerations, force or threats). There are instances where consent might not be possible due to cognitive

² See Good Practice Note, Environmental and Social Framework for IPF Operations: Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works (The World Bank, 2d ed. 2020).

³ Ibid.

impairments and/or physical, sensory, or developmental disabilities. **Under this CoC,⁴ consent cannot be given by anyone under the age of 18, regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of the child is not a defense.**

There is no consent when agreement is obtained through:

- the use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation,
- the use of a threat to withhold a benefit to which the person is already entitled, or
- a promise is made to the person to provide a benefit.
- A person under the influence of alcohol

PERSONEL OBLIGATIONS:

I, [*PERSON SIGNING THE CODE OF CONDUCT SHALL INSERT THEIR NAME HERE*], as a worker or Contractor Personnel, engaged/employed in relation to the ASCENT Project, shall:

1. carry out my duties competently and diligently;
2. comply with this CoC and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person;
3. maintain a safe working environment, including by:
 - a. ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health;
 - b. wearing required personal protective equipment;
 - c. following all prescribed environmental and occupational health and safety standards;
 - d. remaining in designated working areas during working hours;
 - e. refraining from any form of theft for assets and facilities including from surrounding communities;
 - f. refraining from possession of alcohol and illegal drugs and other controlled substances in the workplace and being under the influence of these substances on the job and during working hours;
 - g. using appropriate measures relating to chemical, physical and biological substances and agents; and
 - h. following applicable emergency operating procedures.
4. report work situations that I believes are not safe or healthy and remove myself from a work situation which I reasonably believe presents an imminent and serious danger to my life or health;
5. treat men, women, and children (persons under the age of 18) with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, disability, resident status, sexual orientation, gender identity, birth or other status;
6. not use language or behavior towards men, women, or children that is violent, harassing, abusive, sexually provocative, demeaning, or culturally inappropriate;
7. not commit any act of physical, psychological, or sexual violence, the threats of these acts, coercion, or deprivation of liberty;

⁴ In accordance with the United Nations Convention on the Rights of the Child.

8. not exchange money, employment, goods, or services for sex, with community members, including sexual favors or other forms of humiliating, degrading or exploitative behavior;
9. not engage in the employment or exploitation of minors in the work environment, which includes any form of sexual activity or any other inappropriate behavior, including grooming or through digital media, with respect to minors (defined as individuals under the age of 18), except in cases of pre-existing marriage in accordance with Eswatini law;⁵ mistaken belief regarding the age of a minor and consent from the minor is not a defense;
10. not engage in any act of sexual harassment, sexual exploitation, or sexual abuse, such as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, including subtle displays of such behavior (in accordance with the definitions provided in this code of conduct);
11. not have sexual interactions with any fellow Project workers or members of the communities⁶ in the areas around the Project work locations, including at any hotels, lodges, or community structures providing Project worker accommodation; this includes relationships involving the withholding, promise of actual provision of a benefit (monetary or non-monetary) to community members in exchange for sex – such sexual activity is considered “non-consensual” within the scope of this CoC;
12. shall respect all rules put into place for worker accommodation, including any hotels, lodges, or other structures, which would encompass restrictions on visitors and limitations regarding access to any other members of the community who are not employed on the Project and not residing in worker accommodations, including any overnight access for non-residents;
13. shall strictly respect Eswatini laws, and any relevant signed international treaties, regarding prohibitions against sexual violence or regarding the protection of the rights of minors and women; acts of sexual violence and violence against minors constitute serious violations of this code;
14. attend all required and relevant trainings related to occupational health and safety, community health and safety, transmission of HIV/AIDS, Public Health Emergencies and other communicable diseases, SEA/SH, and violence against children/child labor, as well as any other relevant courses as requested for Project workers and contractor personnel;
15. ensure full respect for any wild fauna and flora, including wild plants, wild animals or other wildlife encountered in relation to Project work sites and in relation to local communities and wildlife habitats, including protected areas located in or near the Project;
16. not hunt, gather, fish, collect, harvest, or disturb any wild birds, and/or their eggs, mammals, amphibians, fish or other aquatic creatures, or reptiles and not engage in any cutting or harvesting of trees or other vegetation anywhere in relation to the Project unless specifically authorized to do so by the Contractor;
17. report violations of this CoC that relate to the harvesting or disturbing of wildlife in areas related to Project worksites or areas near the Project and be encouraged to report any other violations of this CoC, including reporting of SEA/SH-related complaints which must be made with survivor consent; and
18. not retaliate against any person who reports violations of this CoC or who makes use of the grievance mechanism for Contractor’s Personnel or the Project’s Grievance Redress Mechanism.

REPORTING CONCERNS OR VIOLATIONS:

If any worker or contractor personnel observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she is encouraged to raise the issue promptly.

⁵ Under S.3 of the Marriage Act of 1964 - No male person below the age of eighteen years and no female person below the age of sixteen years may marry

⁶ This excludes cases of pre-existing marriage between fellow workers or members of local communities and Project workers.

This can be done in the following ways:

1. Contact EEC Social Development Officer by writing to this address **P. O. Box 8 Mbabane or by telephone at 27094017 or in person at Eswatini Utility Company, atsini House, Mhlambanyatsi Road, Mbabane, Email.info@eec.co.sz**
2. Call [*EEC—PLEASE INSERT REQUESTED INFORMATION*] to reach the Contractor's hotline (*if any*) and leave a message.

The person's identity will be kept confidential, unless reporting of allegations is mandated by Eswatini law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. The Project takes seriously all reports of possible misconduct and allegations of violations of this CoC and, as such, will investigate and take appropriate action. In the case of SEA/SH-related complaints, the Project will likewise provide safe and confidential referrals to service providers in order to provide support to the individual who has experienced an incident of violence or abuse, as appropriate and with the consent of the survivor.

There will be no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

APPLICABLE SANCTIONS:

Any violation of this CoC by Contractor's Personnel may result in serious consequences as well as sanctions, up to and including termination and possible referral to legal authorities, such as the following:

- A warning (verbal and written) depending on the gravity of the offence and the propensity of occurrence;
- supplemental training to address the problem relating to the worker's conduct, such as training on SEA/SH;
- Suspension of employment (without payment of salary), for a maximum period of one month; short of a dismissal.
- Termination of personnel employment in accordance Section 36 of The Employment Act;
- Report the incident/conduct to the police (in cases of SEA/SH, with survivor consent).

FOR ASCENT PROJECT WORKER OR OTHER CONTRACTOR PERSONNEL:

I do hereby acknowledge that I have read and understood the foregoing Code of Conduct, do agree to comply with the standards contained therein, and understand my roles and responsibilities. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in termination of my contract.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Appendix 5: Illustrations Of Prohibited Behaviors Related To SEA/SH

The following non-exhaustive list is intended to provide examples of prohibited behaviors:

(1) Examples of sexual exploitation and abuse include, but are not limited to:

- A Project worker tells women in the community that he can get them jobs related to the work site (cooking and cleaning) in exchange for sex.
- A worker that is connecting electricity input to households says that he can connect female-headed households to the grid in exchange for sex.
- A Project worker denies passage of a woman through the site that he is working on unless she performs a sexual favor.
- A manager tells a woman applying for a job that he will only hire her if she has sex with him.
- A worker begins a friendship with a 17-year-old girl who walks to and from school on the road where Project-related work is taking place, which ultimately results in sex.

(2) Examples of sexual harassment in a work context include, but are not limited to:

- Male staff comment on the appearances of female staff in both positive and negative ways and their sexual desirability.
- When a female staff member complains about comments male staff are making about her appearance, they say she is “asking for it” because of how she dresses.
- A male manager touches a female staff members’ buttocks when he passes her at work.
- A male staff member tells a female staff member that he will get her a raise if she sends him naked photographs of herself.
- A male supervisor pressures a female staff member to engage in sexual relations in exchange for a promotion.

Appendix 5 : Lease Agreement Sample

RENTAL LEASE AGREEMENT

1. PARTIES.

This Rental Lease Agreement (the "Agreement") made _____ (mm/dd/yyyy) is between:

Tenant(s): _____ (the "Tenant") Landlord:
_____ (the "Landlord") Landlord

Address: _____

2. PROPERTY.

The Tenant will lease the following property from the Landlord:

Address: _____

Type: ☐ Whole homestead ☐ Rooms within a house ☐ Houses given within a homestead ☐ Other:

3. LEASE TERM.

The Agreement will start and end on the dates entered below:

Start Date: _____ (mm/dd/yyyy) End Date: _____ (mm/dd/yyyy)

4. RENT.

The Tenant agrees to pay E_____ (the "Rent") to the Landlord on a monthly basis. Rent will be due on the _____ of every month, to be paid in the following manner (enter payment instructions):

_____.

5. ACKNOWLEDGMENT.

By signing below, the Tenant hereby acknowledges that they have read, understood, and agreed to all parts of this document.

Landlord Signature: _____ Date: _____

Printed Name: _____

Tenant Signature: _____ Date: _____ Printed Name: _____

Group scheme chairperson: _____ Date: _____

Printed Name: _____

Appendix 6: Accommodation Check List

PROJECT DETAILS			
Project Name:			
Site Location:			
Project No.			
Inspection Date		Time	
Name of Contractor:			
Attended by:			
Name of EEC representative:			

1. Purpose

The ASCENT Labor Management Procedures (LMP) and the Environment Social Framework (ESF) specify commitments of accommodation for contractor workers for both Component 1a and 2 in line with the World Bank ESF requirements. The ASCENT social team is responsible for conducting accommodation sites assessment that have been identified by Contractors as their responsibility. Consequently, the purpose of this inspection is to assess if the identified accommodation suits and meets the LMP requirements and make recommendations for alternatives to be identified (if site does not meet the requirements) or improvements (if accommodation meets some or most but not all requirements) before contractor workers can move in.

2. Accommodation inspection requirements

ACCOMMODATION REQUIREMENTS	YES	NO
Fenced and provided with adequate security		
Properly roofed kitchen facility		
Big enough sleeping facility protected from all weather conditions		
Ablution facilities (segregated by gender), can be rented out if not available on site		
Safe and secure bathing facility		
Adequate lighting, including for accessing sanitary		
Regular adequate supply of portable water for washing and drinking. (To be sourced out using tanks if not available on site)		
Any other observation on site		

3. Rectifications required/Recommendations

4. GBV/SEA/SH/ Considerations

NOTES – Rectification works required before contractor moves into site	Comments
Security (Fencing & Locks)	
Kitchen Facility	
Sleeping Facility	
Ablution Facility	
Potable Water	
Lighting	
Bathing Facility	
Other rectification	

5. Approval of Accommodation (*tick*)

As per the LMP requirements (page 13, section 1.9 of the LMP) for suitable accommodation for contractor workers the accommodation is:

Approved	
Approved with recommendations to be met first	
Not approved (alternative to be considered)	
Follow up date if accommodation not approved	

6. Signatures

SIGNED by:		
SOCIAL STANDARDS OFFICER	OTHER EEC REPRESENTATIVE	CONTRACTOR REPRESENTATIVE
DATE:	DATE:	DATE:

In order to further safeguard compliance at all times to the requirements ESS2 paragraph 28 and ESS4 and to mitigate GBV/SEA/SH, the PIU will implement the following measures including subcontractors.

- The EEC will undertake monthly monitoring of each NCP and each private home where applicable and report on the status of acceptability to the PIU.*

- *Wherever possible, the EEC shall require contractors to retrofit private rooms that do not meet the acceptable hygienic, sanitary and safety standards with regular supply of potable water, safe cooking, bathing, food storage & ablution facilities.*
- *The EEC will ensure separation of workers from households lodging them such as flats/structures apart from the main house, independent bathing facility, and potable water supply for workers. EEC will ensure that contractors do not share such resources with household.*
- *The EEC will also ensure that these vacant rooms are lockable and secure and separate for males and females.*
- *Implement a Code of Conduct for all project workers that will include related to GBV/SEA/SH and which all contractors, subcontractors and primary suppliers will agree to abide by as a condition of contract.*