



ELMED Etudes SARL

Contractor Doc No: LM-01

Date
2023-04-12

Pag. 1 of 37

Tunisia-Italy Power Interconnector Project

Environmental and Social Impact Assessment (ESIA)

Labor Management Procedure (LMP)

Tunisia

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05	2023-04-12	Revision after STEG's comments	PLEXUS (J.Wagner)	HPC (R.Andrighetto)	HPC (A.Cappellini)
04	2023-03-24	Revision after STEG's comments		PLEXUS (J.Wagner)	
03	2023-03-08	Revision after WB's comments		PLEXUS (J.Wagner)	
02	2023-02-15	Revision after WB's comments			
01	2022-11-30	Second emission		EnveftHPC (M.Pecora)	
00	2022-11-11	First emission			
Rev.	Date	Description	Prepared by	Checked by	Approved by

ELMED

Revision Approved	Approval Date	Approved by

TABLE OF CONTENTS

Abbreviations.....	4
1. INTRODUCTION.....	5
1.1 Project Background	5
1.2 Project Description.....	5
1.3 Purpose of LMP	6
1.4 Project Risk Rating.....	7
1.5 Scope of LMP	7
1.6 Content of LMP	8
1.7 Execution Plans	8
2. PROJECT LABOR USE.....	9
2.1 Introduction.....	9
2.2 Types and Numbers of Workers	9
2.3 Timing of Labor Requirements	10
2.4 Contracting Structure	10
3. ESS2 AND LEGAL REQUIREMENTS.....	11
3.1 Introduction	11
3.2 Requirements of ESS2	11
3.3 ESF Requirements on Labor Influx	12
3.4 Requirements of World Bank EHS Guidelines.....	13
3.5 National Labor Laws	13
3.5.1 Introduction	13
3.5.2 Terms and Conditions.....	14
3.5.3 Occupational Health and Safety	16
4. ROLES AND RESPONSIBILITIES.....	20
5. KEY POTENTIAL LABOR RISKS.....	22
5.1 Key Labor Risks.....	22
5.2 Other Risks.....	23
Unfair Treatment and Discrimination.....	23
Wages, Deductions and Benefits	23
Supply Chain Risks.....	23
Forced Labor and Restriction of Child Labor	24
Gender Issues	24
GBV and SEA/SH Risks.....	24
6. POLICIES, PROCEDURES AND RISK MITIGATION MEASURES.....	25
6.1 Introduction.....	25



6.2 Code of Conduct.....25

6.3 Terms and Conditions of Employment25

6.4 Site-Specific Labor Management Plans.....27

6.5 Direct Project Workers.....27

6.6 Contracted Workers28

6.7 Primary Supply Workers.....28

6.8 Age of Employment.....29

6.9 Labor Influx30

6.10 Vulnerable Groups.....30

6.11 Gender31

7. WORKER GRIEVANCE MECHANISM.....31

7.1 Introduction.....31

7.2 Purpose of GRM.....31

7.3 Grievance Register32

7.4 GRM Process32

7.5 GBV and SEA/SH Grievances34

7.6 Worker Feedback System.....34

8. CONTRACTOR SELECTION AND MANAGEMENT35

8.1 Contractor Selection35

8.2 Performance Monitoring35

8.3 Supply Chain Management36

9. MONITORING, EVALUATION AND REPORTING.....37

9.1 Monitoring and Evaluation37

9.2 Reporting.....37

9.3 Record Keeping37

9.4 Capacity Building37

9.5 Consultation.....37

ABBREVIATIONS

Acronyms	Description
ESF	Environmental and Social Framework
E&S	Environmental and Social
ESCP	Environmental and Social Coomitment Plan
ESIA	Environment and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GBV	Gender-based Violence
GRM	Grievance Redress Mechanism
HSE	Health, Safety and Environment
IA	Implementation Agency
IFC	International Finance Corporation
ILO	International Labour Organization
KPI	Key Performance Indicator
LMP	Labour Management Procedure
LWC	Labor and Working Conditions
M&E	Monitoring and Evaluation
NGO	Non Governmental Organisation
OHS	Occupational Health and Safety
PMU	Project Management Unit
PS	Performance Standard
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SMPs	Social Management Plans
WB	World Bank
WGRM	Worker Grievance Redress Mechanism

1. INTRODUCTION

1.1 Project Background

The Tunisia-Italy Power Interconnector (“Elmed Interconnector”) is a bidirectional HVDC (High Voltage Direct Current) submarine electricity interconnection between Tunisia (Cap Bon) and Italy (Sicily), with a transmission capacity of 600 MW. The Project, which will link Tunisia’s power grid to the much larger European network, aims to increase the interconnection capacity - and thus the security and sustainability of supply - of the Euro-Mediterranean system by creating a link between the European and Northern African energy systems.

The Project is being implemented by ELMED Etudes, a joint venture between the Italian Transmission System Operator (TSO), TERNA (Rete Elettrica Nazionale S.p.a) and the Tunisian energy utility STEG (Société Tunisienne de l’Électricité et du Gaz), which is in charge of the Tunisian side. The World Bank will finance the converter station and Tunisian grid investments, with the submarine cable in Tunisian waters being financed by the European Investment Bank (EIB), Kreditanstalt für Wiederaufbau (KfW) and the European Bank for Reconstruction and Development (EBRD), in parallel financing. On the other hand, the submarine cable is considered by the World Bank as an associated facility, and therefore the Borrower (the Republic of Tunisia) needs to apply the World Bank’s Environmental and Social Framework (ESF) for the submarine cable (and other environmental and social (E&S) standards of parallel funders, as appropriate).

1.2 Project Description

The project involves the creation of a new marine high-voltage DC cable interconnection between Italy and Tunisia, between Sicily on the Italian side and the Cap Bon peninsula in Tunisia (see **Figure 1**). On the Tunisian side, the project consists of: a) a 10km underground cable from the marine cable landfall area to an Alternating/Direct Current (AC/DC) converter station in Mlaaba municipality, in the Cap Bon area; b) a new new 400/225 kV substation in Grombalia; c) a new 400 kV double-circuit OHL of 65 km length from the new HVDC converter station to the 400 kV Grombalia 2 substation; and (iv) a new 400kV single-circuit OHTL of 51 km from Grombalia 2 substation to the existing Mornaguia substation in the greater Tunis area (see **Figures 2 and 3**),



Figure 1: Project Map

The overhead line (OHL) crosses areas belonging to: six delegations in the Nabeul governorate: Menzel Temime , El Mida, Korba, Menzel Bouzelfa, Beni Khalled and Grombalia; two delegations in the governorate of Ben Arous: Mornag and Mhamedia; one delegation in the governorate of Zaghouan: Bir Mchergua; and one delegation in the

governorate of Manouba: Mornaguia. Associated works include facilities required during construction (work sites, crossings, construction sites, access roads) (see **Figure 2**).

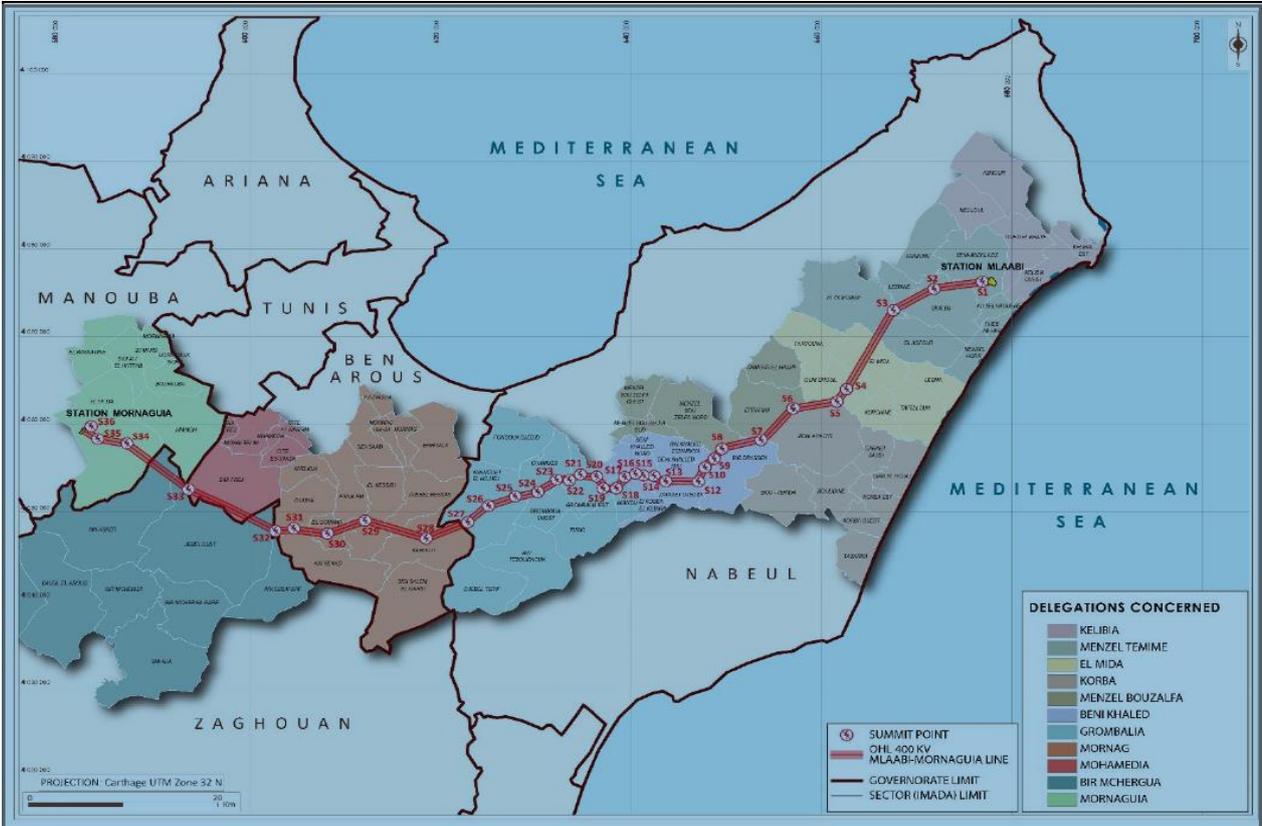


Figure 2: Route of the OHL and Administrative Units

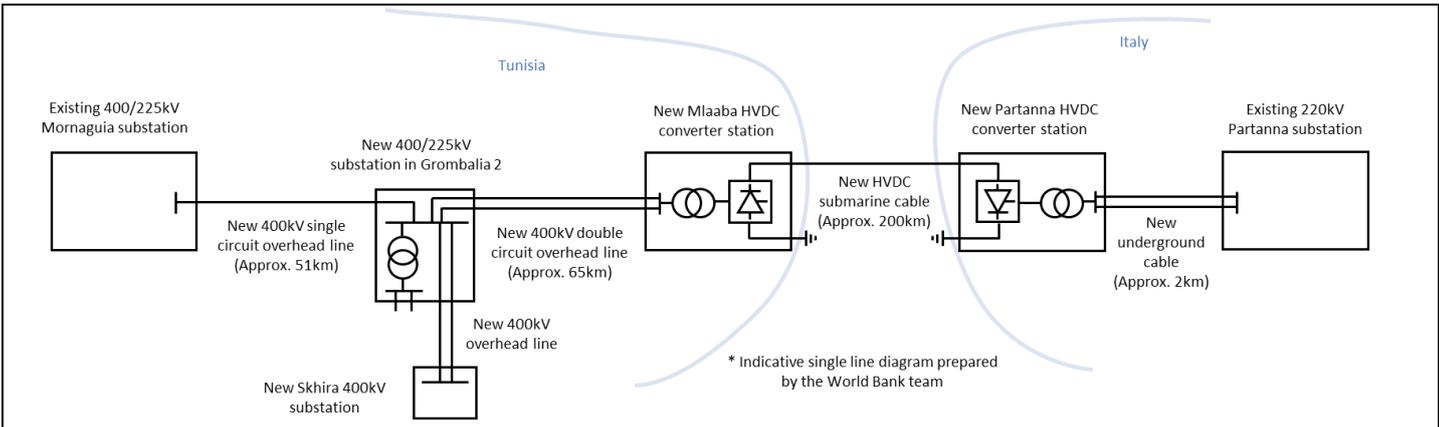


Figure 3: Schematic diagram of Project and associated facilities

1.3 Purpose of LMP

This Labor Management Procedure (LMP) has been prepared in accordance with the requirements of the World Bank’s Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions (LWC). It sets out a framework for the implementing institution - STEG - to manage labor-related risks and implement measures that will avoid or reduce labor-related risks and impacts on workers.

The LMP reflects the commitment of Republic of Tunisia as the Borrower (Project Management Unit - PMU) and STEG as the Implementing Agency (IA) to develop and implement labor management procedures for project workers in all categories (direct workers, contracted workers, primary supply workers and community workers) to ensure compliance

    		ELMED Etudes SARL
Contractor Doc No: LM-01	Date 2023-04-12	

with the standards set by ESS2 and applicable Tunisian legislation. In accordance with the loan agreement, where there are differences the more stringent provisions will be applied.

The purpose of the LMP is to ensure the health and safety of all personnel in order to concur and maintain a smooth and proper progress of work at the site and prevent accidents and to facilitate planning and implementation of the project and to enable different project-related parties such as Borrower staff, and contractors to have an understanding of what is required on any specific labor issue. The LMP identifies the main LWC requirements and risks associated with the Project, describes how these risks will be mitigated and managed and determines the resources necessary to address project labor issues and mitigate any negative impacts on workers and contractors.

The specific objectives of the LMP are to:

- promote compliance with ESS2 and Tunisian employment, labour and occupational health and safety laws;
- establish, maintain, and improve the worker management relationship;
- promote the fair treatment, non-discrimination, and equal opportunity of workers (including foreign workers)¹;
- protect workers, including vulnerable categories of workers such as migrant workers, workers engaged by third parties, and workers in the client's supply chain; and
- avoid the use of forced labour and child labour.

1.4 Project Risk Rating

The social risk rating of the Project is classified as "substantial" under the ESF, based on the information currently available, and especially considering the greenfield and transboundary nature and technical complexity of the project, the possible use of labour camps as well as the anticipated significant OHS risks for workers (such as work at height and sea, risk of electrocution, work with heavy machines, vehicles and vessels). The transboundary nature is further complicated by the influx of immigrants from Bizette, Tunis and Cap Bon to Sicily.

The number of foreign migrants attempting to cross from Tunisia to Europe rose substantially in 2020. 2722 foreign migrants were intercepted along the country's coastline and offshore, compared to 1 257 in 2019. Italian authorities recorded a similar jump, with 1 816 foreigners recorded as embarking from Tunisia, versus 979 in 2019. Available Tunisian and Italian data indicates that, between 2018 and 2021, nationals from Côte d'Ivoire, Guinea, Cameroon, Burkina Faso, Mali, Niger, Chad, Sudan, Ghana, Gambia, Somalia, Algeria, Morocco, Syria and Iraq attempted to cross.²

Most foreign migrants departing from Tunisia are male. However, similar to Tunisian migrants, a growing number of foreign women, children and infants have been among the flow of migrants leaving. In 2020, for example, Tunisian security and defense forces reported catching at least 249 foreign female migrants, 51 children and 3 infants, although, due to sometimes unspecific reporting, the actual numbers in all categories are likely higher. This increases the risk of interactions between project workers and vulnerable migrants.

1.5 Scope of LMP

The LWC requirements set out in the LMP are applicable throughout the Project's life cycle, from construction through to operations and decommissioning. The LMP applies to the Tunisian section of the Project and covers the offshore section to the landfall of the cable, the underground line, the converter station at Mlaabi and the OHL to Mornaguia.

The LMP deals with multiple aspects relating to the Project and contractor workforce including: recruitment and selection of workers; protection of worker rights; terms and conditions of employment; labour conditions and protection; worker accommodation; management of worker relationships; occupational health and safety (OHS); management of contractor-worker relationships, policies and procedures on discipline, grievances, pay complaints; industrial action; demobilization, training for workers; and management of worker/community interactions that may lead to adverse community level impacts. It also covers key labor risks associated with the project including:

¹ This refers to foreign workers who, in accordance with Tunisian immigration and labor legislation, have the requisite status and can be lawfully employed.

² Herbert, M. 2022. LOSING HOPE. Why Tunisians are leading the surge in irregular migration to Europe. Research Report. GI-TOC's Observatory of Illicit Economies in North Africa and the Sahel.

					
Contractor Doc No: LM-01		Date 2023-04-12	Pag. 8 of 37		

- Possible accidents or emergencies, with reference to the sector or locality;
- Hazardous work (e.g. work at heights / in confined spaces, use of heavy machinery, use of hazardous materials);
- Likely incidents of child or forced labor, with reference to the sector or locality;
- Likely presence of migrants or seasonal workers and the risk of unmanaged labor influx;
- Risks of sexual exploitation and abuse, sexual harassment (SEA/SH) and gender based violence (GBV).

The LMP applies to direct, contracted, primary supply and community workers as defined by ESS2, whereby "project worker" refers to: a) "people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project (direct workers); b) people employed or engaged through third parties to perform work related to core functions of the project, regardless of location (contracted workers); c) people employed or engaged by the Borrower's primary suppliers (primary supply workers); and d) people employed or engaged in providing community labor (community workers). It should be noted that in the context of this project, there are no plans to employ or engage community labour.

In regard to civil servants, ESS2 provides that where government civil servants are working in connection with the project they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project. Consequently, ESS2 will not apply to such government civil servants, except for the provisions of paragraphs 17 to 20 (Child and Forced Labour) and paragraphs 24 to 30 (Occupational Health and Safety). As regards contractors, all contractors and sub-contractors will be required to follow the policies, measures and procedures set out in this LMP.

1.6 Content of LMP

Section 2 of the LMP defines the categories of workers and project activities and provides an indication of the numbers, timing and type for each category of project worker. **Section 3** describes the requirements of ESS2 and the corresponding legal framework for labor and working conditions in Tunisia. **Section 4** describes roles and responsibilities for labor management for the Tunisian section of the project. **Section 5** comprises an analysis of key labor risks. **Section 6** describes project policies, procedures and risk mitigation measures. **Section 7** describes the Worker Grievance Redress Mechanism (GRM) and **Section 8** describes monitoring, evaluation and reporting arrangements.

1.7 Execution Plans

STEG will also prepare an execution plan and related checklists summarising the key tasks identified in the LMP for the benefit of field staff and contractors charged with implementing the LMP. These execution plans may be brought together in a simple booklet, in accessible French and Arabic language, explaining the requirements of the LMP and related social management plans. The execution plans and the booklet will include details of the Worker Grievance Redress Mechanism. This booklet will be disseminated to all project direct workers and contractors.

2. PROJECT LABOR USE

2.1 Introduction

As noted above in Section 1.4, this LMP applies to project workers as defined by ESS2 who are employed directly by the project at project offices and on the construction sites and employees of contractors and service providers, including part time, temporary, seasonal or migrant workers. Employees of direct suppliers to the project are considered as primary supply workers and are covered by provisions of the LMP relating to prevention of child labor, forced labor and safety issues.

In recognition of the fact that the project construction aspects and related workforce details will only be available at the tendering stage, this LMP, in accordance with ESS2, provides estimates only of the anticipated number, types and characteristics of the project worker force.³ Similarly, the anticipated contracting structure for the project and the likely number of project workers to be employed or engaged by each contractor/subcontractor is not known at this time. Once the relevant information is available, the LMP will be updated accordingly. In accordance with ESS2 (para 8), the provisions of ESS2 do not apply to civil servants except with regard to the provisions on child labour, forced labour and OHS.

Note: The largest number of workers in any one category will be construction workers on works contracts. Given that the majority of the project activities will revolve around construction of the OHL, the underground cable and the converter station, it can be assumed that there will be mostly unskilled and semiskilled construction laborers who will be engaged.

2.2 Types and Numbers of Workers

It is estimated that the Project will employ 300 contracted workers during construction and 25-30 for the operations and maintenance stage. STEG will involve different categories of workers, who will be engaged in the various project construction activities. as follows:

1. **Direct Workers.** Non-civil servant workers employed or engaged directly by STEG (Implementing Agency, IA) or the PMU on its behalf to work specifically in relation to the Project. This includes managers, advisers, support staff and Community Liaison Officers (CLOs).
2. **Contracted Workers.** The project will largely be implemented by contracted workers, that is people employed or engaged by third parties to perform work related to core functions of the project. This category includes employees of construction contractors and service providers, and suppliers of goods in some circumstances (e.g. if the supply contract includes installation at a project site).
3. **Primary Supply Workers.** People employed or engaged by project's primary suppliers of goods and materials for its core function (construction material, HVAC equipment and machineries, etc). These are workers who are employed on an ongoing basis, who provide directly to the project goods or materials essential for the core functions of the project. Importantly, workers of suppliers to construction contractors may be considered as falling within this category. This category includes workers in sectors where the ESIA has identified concerns about OHS standards, use of child labor and forced labor including commercial agriculture establishments supplying planting materials to the project, and/or workers producing construction materials.
4. **Community Workers.** The Project will not have community workers as defined under ESS2. The community membersto be engaged by the contractors will be cateogorised and managed as "contracted workers".

Child labor is prohibited and all workers will be over 18. It is assumed that the average age of workers will be 25-30 years. There will be no child or forced labor associated with this project.

As for the characteristics of labor force market along the route of the OHL, it is not expected that the number of female workers will be very high. It is estimated that women would represent about 5% of the workforce (direct and indirect contract workers) during construction⁴, and those would likely be technical (engineering, planning, management) and/or staff working in the operation offices and labor camps (maids, cooks, cleaners etc.), if the labor camps are used.

³ The project will not engage community labor or security forces. However while employing security personnel, the Borrower will (i) make reasonable inquiries to verify that the security personnel employed by the Borrower to provide security are not implicated in past abuses; (ii) train them adequately (or determine that they are properly trained) in the use of force (and where applicable, firearms), and appropriate conduct toward workers and affected communities; and (iii) require them to act within the applicable law and any requirements set out in the ESCP.

⁴ This would be distributed amongst local, national and international workers.

Whereas the overall number of direct and indirect contracted workers is not expected to be large - 300 during construction and 30 national workers for the operations and maintenance stage⁵ - the exact number of workers required will only be determined with the design and approval of the construction work plan at the tendering stage, at which point the project prepare a detailed project work plan with estimates of the work force work days and work force characteristics per work site, as outlined in **Table 1** below. As for the number of direct workers hired by ELMED during the Operation Phase, this is estimated to be 5 direct contract workers (local, national, international). STEG confirms further that no workers will be recruited through brokers, intermediaries or agents and that the minimum age of workers is 18.

Table 1: Estimate of Contractors' Work-Force Work Days

Project Year	Number of Packages	Total Site Days	Total Labor-Days	Average Workers on 1 site/Lot
1				
2				
3				
4				
5				

2.3 Timing of Labor Requirements

The timing and sequencing of labor requirements in terms locations, jobs and skills will be determined with the design and approval of the construction work plan at the tendering stage. Direct Workers will be recruited as soon as the Project is approved, especially those forming part of the IA.

2.4 Contracting Structure

The anticipated contracting structure for the Project provides for a lead contractor for earth works (details on different work streams for the marine cable, the underground cable, the converter station and the OHL, in addition to access roads and related secondary works. The specific contracting structure is in the process of being determined and will be publicised closer to the tendering stage.

⁵ The estimated percentage of national female workers during operations is 5%.

3. ESS2 AND LEGAL REQUIREMENTS

3.1 Introduction

The Project is subject to a combination of World Bank requirements, national regulatory requirements and relevant international standards covering LWC. This section provides a summary of applicable World Bank, international legal and relevant Tunisian regulatory requirements. It is noted that in the case of conflict between these standards, the more stringent applies.

3.2 Requirements of ESS2

ESS2 aims to promote OHS and the fair treatment, non-discrimination, and equal opportunity of project workers; protect project workers, including vulnerable workers such as women, disabled people, children (of working age) and migrant workers, contract workers, community workers, and primary supply workers, as appropriate. Further, it aims to prevent the use of all forms of forced and child labor; to support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; and to provide project workers with accessible means to raise workplace concerns.

ESS2 applies to project workers including full-time, part-time, temporary, seasonal and migrant workers. Where government civil servants are working in connection with the project, whether full-time or part-time, they remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project; ESS2 does not apply to government civil servants except in relation to child labour, forced labour and OHS. ESS2 includes a range of requirements on LWC, including OHS, that cover the following areas:

- **Working conditions and management of worker relationships including requirements that ensure:**
 - Project workers are provided with written and clear terms and conditions of employment, consistent with national legal requirements;
 - The principles of non-discrimination and equal opportunity are applied to project workers, and that vulnerable project workers are protected;
 - The rights of workers to form workers organizations, consistent with national law, are respected;
 - Where national law restricts workers' organizations, borrowers will not restrict project workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment.
- **Measures to protect the workforce, including:**
 - Provisions to prevent employment of children below the age of 14 or the national legal minimum, whichever is higher, and restrictions on employment of children under 18;
 - Prevention of forced labor, including debt bondage.
- **Measures relating to remuneration and rest periods, including:**
 - Provisions to ensure that project workers are paid on a regular basis as required by national law and labor management procedures;
 - Provisions to ensure that deductions from payment of wages are only made as allowed by national law or the labor management procedures and that project workers are informed of the conditions under which such deductions will be made;
 - Provisions to ensure that project workers are provided with adequate periods of rest per week, annual holiday, and sick, maternity and family leave, as required by national law and labor management procedures.
- **Establishment of a grievance mechanism for direct and contracted workers by the direct employer that:**
 - Is separate from the project grievance mechanism;
 - Ensures that workers can raise work-place concerns, including anonymously;
 - Is proportionate to the nature and scale and the potential risks and impacts of the project;
 - Is designed to address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution, and will operate in an independent and objective manner;

- Does not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures.
- **OHS requirements that address or provide for:**
 - The identification of potential hazards to project workers, particularly those that may be life threatening;
 - Preventative and protective measures, including regarding hazardous conditions or substances and the use of PPE;
 - The development and implementation by employers of procedures to establish and maintain a safe working environment;
 - The training of project workers and maintenance of training records;
 - Documentation and reporting of occupational accidents, diseases and incidents;
 - Emergency prevention preparedness and response arrangements to emergency situations;
 - Remedies for adverse impacts such as occupational injuries, deaths, disabilities and disease;
 - The active collaboration with and consultation of project workers by employers to promote understanding, the provision of information and training on OHS, and making available personal protective equipment free of charge to project workers;
 - Putting in place workplace processes for project workers to report work situations they believe are unsafe or unhealthy, and to remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to their life or health;
 - The provision of facilities appropriate to the circumstances of project workers' work, including access to canteens, hygiene facilities, and appropriate areas for rest;
 - The adoption and implementation of policies, where accommodation is provided, on the management and quality of accommodation to protect and promote the health, safety, and well-being of the project workers, including the provision or access to services that accommodate their physical, social and cultural needs;
 - The establishment of a system for regular review of OHS performance and the working environment to ensure the identification of safety and health hazards and risks, and the implementation of effective methods for responding to identified hazards and risks, setting priorities for taking action, and evaluation of results;
 - Ensuring a balanced representation of women on OHS committees to address women-specific issues - responding to the needs of female project workers.

In regard to contracted workers, ESS2 requires the borrower to make reasonable efforts to ascertain that third parties who engage contracted workers are legitimate and reliable entities and have in place labor management procedures applicable to the project that will allow them to operate in accordance with the requirements of ESS2. Borrowers must also require such third parties to include equivalent requirements and non-compliance remedies in their contractual agreements with subcontractors. Further, contracted workers must be given access to a grievance mechanism.

In regard to primary supply workers, ESS2 (Sec 39) provides that as part of the ESIA the risks of child and forced labor and serious OHS issues that may arise will be assessed in relation to primary supply workers. Where a significant risk of child or forced labor related to primary supply workers is identified, the Project will require the primary supplier to identify those risks consistent with sections 17-20 of ESS2. The Project will also set out roles and responsibilities for monitoring primary supplier and where child or forced labor cases are identified, the Project will require the primary supplier to take appropriate steps to remedy them (ESS2, Section 40).

In regard to community workers, borrowers must apply the relevant provisions of ESS2 in a manner which reflects and is proportionate to: the nature and scope of the project; the specific project activities in which the community workers are engaged; and the nature of the potential risks and impacts to the community workers. ESS2 also provides that in preparing the labor management procedures, the borrower clearly identifies the terms and conditions on which community labor will be engaged, including the amount and method of payment (if applicable) and times of work.

Further, the labor management procedures must specify the way in which community workers can raise grievances in relation to the project. Borrowers must also assess the potential risks and impacts of the activities to be conducted by community workers and, at a minimum, apply the relevant requirements of the World Bank's General Environmental Health and Safety (EHS) Guidelines and industry-specific EHS Guidelines. Finally, ESS2 requires the borrower to assess whether there is a risk of child labor or forced labor within community labor.

3.3 ESF Requirements on Labor Influx

Although the overall number of workers on the project is not expected to be significant, there is still likely to be a degree of labor influx. In an effort to reduce the impacts associated with labor influx, as well as to provide temporary or more

    		ELMED Etudes SARL
Contractor Doc No: LM-01	Date 2023-04-12	

long-term employment opportunities to some of the affected communities, the borrower will require contractors to recruit construction workers from the country, with preference given to recruitment of workers from Project-affected communities. The borrower will moreover abide by the World Bank's Good Practice Note on Assessing and Managing the Risks of Adverse Impacts on Communities from Project-Related Labor Influx.

3.4 Requirements of World Bank EHS Guidelines

The World Bank **EHS Guidelines, Section 2.0 (Occupational Health and Safety)** are applicable to the Project. These guidelines require employers and supervisors to implement all reasonable precautions to protect the health and safety of workers and provide guidance and examples of reasonable precautions to implement in managing principal risks to occupational health and safety in Bank-funded projects.

They require borrowers to adopt preventive and protective measures in order to: eliminate the hazard by removing the activity from the work process; control the hazard at its source through use of engineering controls; and minimize the hazard through design of safe work systems and administrative or institutional control measures. Examples include job rotation, training safe work procedures, lock-out and tag-out, workplace monitoring, limiting; and providing appropriate personal protective equipment (PPE) in conjunction with training, use, and maintenance of the PPE. Further, they require borrowers to apply prevention and control measures to OHS hazards based on comprehensive job safety or job hazard analyses, noting that the results of these analyses should be prioritized as part of an action plan based on the likelihood and severity of the consequence of exposure to the identified hazards.

The EHS Guidelines also set out provisions on facility design and operation; communication and training; physical hazards; chemical hazards; PPE; special hazard environments (e.g. Confined Space, Lone and Isolated Workers) and in regard to monitoring for accidents and diseases.

Additional provisions applicable to the Project are set out in the World Bank EHS Guidelines 4.0 (Construction and Decommissioning), the World Bank EHS Guidelines for Ports, Harbours and Terminals (v. 2.2.2017); and the World Bank Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution (2007).

Note: In regard to the offshore portion of the Project, the International Convention for the Safety of Life at Sea (SOLAS) specifies minimum standards for the construction, equipment and operation of ships, compatible with their safety and related IMO regulations.

3.5 National Labor Laws

3.5.1 Introduction

Responsibility for LWC in Tunisia lies with the Ministry of Social Affairs. In accordance with the Labor Code (Article 170) the Labor Inspection function under the Ministry of Social Affairs is in charge of supervising the application of the provisions on LWC in Tunisia and in assisting the governorates in the exercise of their duties in the area of OHS. The Labor Code (Article 60) also establishes the Inspectorate of Workplace Medicine, which is in charge of ensuring that occupational medical provisions are complied with.

The legal framework in Tunisia on LWC is provided by Decree No 68-328 of 22 October 1968 (Labor Code, as amended), framework sectoral collective agreements, as well as Ministerial Orders and Decrees.⁶ The legislation provides for the protection of the fundamental rights of workers, including the right to organise; the right to strike; annual leave; working hours and overtime; guaranteed minimum wages; employment relationships, child labor and a guarantee of social security. The employment relationship is also governed by an array of Ministerial Orders and Decrees. Other applicable legislation relating to labor and working conditions in Tunisia includes the following:

- Law No 66-27 of 30 April 1966, promulgating the Labour Code and all the texts that have amended or supplemented it, in particular Law No. 96-62 of July 15, 1996 and Law No. 2007-19 of April 2, 2007;
- Book of General Administrative Clauses applicable to public works contracts of 19 October 1990;
- Law No 2002-24 of 27 February 2002, amending Law No 96-101 of 18 November 1996, on social protection of workers;
- Decree-Law No 2011-51 of 6 June 2011, amending the Labor Code;

⁶ Decree No 68-328 of 22 October 1968 laying down the general rules of hygiene applicable in companies subject to the labor code. Key amendments to the Labor Code were introduced by Law No. 96-62.

- Child Protection Code;
- Social Contract for Decent Work, 2017;
- Law No 58 of 26 July 2017 on Eliminating Violence against Women.

Applicable ILO Conventions

Tunisia has been a member of the ILO since 1956 and has ratified some 61 international conventions, including the following:

- Forced Labour Convention, 1930 (No 29)
- Safety Provisions (Building) Convention, 1937 (No 62)
- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No 87)
- Night Work (Women) Convention (Revised), 1948 (No 89)
- Right to Organise and Collective Bargaining Convention, 1949 (No 98)
- Abolition of Forced Labour Convention, 1957 (No 105)
- Maximum Weight, 1971 (No 127)
- Minimum Age Convention, 1973 (No 138)
- Collective Bargaining Convention, 1981 (No 154)
- Worst Forms of Child Labour Convention, 1999 (No 182)
- Maritime Labour Convention, 2006 (MLC 2006)⁷
- Social Contract (2017-2022): The Social Contract, also known as the Programme for Decent Work (PPTD), is a tripartite agreement between the main Tunisian unions and the government and aims to promote decent work and working conditions and improved governance of worker relations in Tunisia.

3.5.2 Terms and Conditions

Issue	Legal Instrument	Provision
Child Labor	Labour Code	Child labor is prohibited in Tunisia. In accordance with Articles 53 and 242 of the Labour Code, the minimum working age in Tunisia is 16. The minimum age for hazardous work, in accordance with Article 58 of the Labor Code, is 18. Workers between the ages of 16 and 18 must have 12 hours of rest per day, which must include the hours between 10 p.m. and 6 a.m. Labor inspectors from the Ministry of Social Affairs monitor compliance with the minimum age law by examining the records of employees.
Forced Labor	Penal Code Law on the Prevention and Fight against Trafficking of Persons	Forced labor is prohibited in Tunisia in accordance with Articles 105, 171, 224 and 250 of the Penal Code and Articles 2.1, 2.5, 2.6 and 8 of the Law on the Prevention and Fight against Trafficking of Persons. The law provides for penalties of up to 10 years' imprisonment for capturing, detaining, or sequestering a person for forced labor.
Working Hours	Labour Code	Article 79 of the Labour Code defines a normal workweek as 48 hours for manual work in the industrial and agricultural sectors. The Labor Code also provides for at least one 24 hour period of rest a week (Article 95). In certain sectors, sectoral collective agreements or regulatory documents drafted after consultation with trade union organisations may lead to a decision to reduce this weekly working time to no less than 40 hours per week. It may also be decided by ministerial decree to increase weekly working hours for certain companies or categories of staff to a maximum of 64 hours in order to take account for the loss of time resulting from the interruption of work or the nature of the job. It is also possible to provide for part-time employment contracts that

⁷ On 13 May 2022, the Special Tripartite Committee (STC) established under Article XIII of the Maritime Labour Convention, 2006, as amended (MLC, 2006), adopted a Resolution on Harassment and Bullying, including Sexual Assault and Sexual Harassment, in the Maritime Sector. The Maritime Safety Committee, at its 105th session, instructed the JTWG (under paragraph 4(c) of its terms of reference) to "consider bullying and harassment in the maritime sector, including sexual assault and sexual harassment, as an item to be considered, at the earliest opportunity, by the JTWG, under paragraph 4(c) of the JTWG's Terms of Reference and list of priorities, with the objective of ensuring a safe and inclusive workplace for seafarers.

Issue	Legal Instrument	Provision
		would entail work performed during a working time not exceeding 70% of the normal working hours applicable to the company.
Conditions of Work	Labour Code	The Labor Code provides for a range of administratively determined minimum wages. For administrative jobs in the private- and public-sectors, the work week is 40 hours with 125-percent premium pay for overtime. The law prohibits excessive compulsory overtime. Depending on years of service, employees are statutorily awarded 18 to 23 days of paid vacation annually. Workers have the right to report violations to regional labor inspectors. Special government regulations control employment in hazardous occupations, such as mining, petroleum engineering, and construction. Workers are free to remove themselves from dangerous situations without jeopardizing their employment, and they can take legal action against employers who retaliate against them for exercising this right. Under the law all workers, including those in the informal sector, are afforded the same occupational safety and health protections.
Wages		Tunisia compensation laws vary based on sector. The minimum wage rate is the wage level set for workers in positions that do not require a professional qualification and below which no employee should be remunerated. Minimum wage rate for agricultural (SMAG) and non-agricultural (SMIG) sector are determined and revised by the government in a decree, after consultations with the most representative employers' and workers' organisations. In those sectors where minimum wages are not determined by the collective agreements, these can be fixed by the Decree. Recommendations for minimum wage rates for both agricultural and non-agricultural workers are made by the "National Committee on Social Dialogue", headed by the Minister of Social Affairs. Wage rate may also be set through collective agreement, provided that the wage rate must not be lower than the minimum wage rate determined by the Government. <i>Note: SMIG and SMAG have been recently revised by the Decree n° 2022-769 of october, 19, 2022.</i>
Dismissal	Labour Code	Employers are free to terminate employment contracts. Dismissal will be considered legally unfair if it occurs without the existence of a genuine and serious cause justifying it or without respect for legal, regulatory or conventional procedures. In the event of unfair dismissal, and except in the event of serious or gross misconduct, a laid-off employee holding an indefinite contract shall receive an end-of-service bonus calculated on the basis of one day's salary per month of actual service in the company. Except in special cases, this bonus is limited to three months of salary. In the event of an unfair dismissal, a laid-off employee who holds a contract of indefinite duration is entitled to damages, the amount of which varies between the monthly salary and the two-month salary, but will not exceed three years of salary. In the event of unfair dismissal, a laid-off employee with a fixed-term contract is entitled to damages equal to the wage corresponding to the remaining duration of the employment contract. For employers undergoing difficulties, the legislature has also provided for dismissals in light of economic or technological reasons in accordance with a procedure provided for by law that protects workers
Freedom of Association and Collective Bargaining		Tunisian law provides workers with the right to organize, form and join unions, and bargain collectively. The law allows workers to strike, provided they give 10 days' advance notice to their federations and receive Ministry of

Issue	Legal Instrument	Provision
		<p>Interior approval. The right to strike extends to civil servants, with the exception of workers in essential services whose interruption would endanger the lives, safety, or health of all or a section of the population. It is understood that the government has not explicitly stipulated which services are "essential." Authorities largely respect the right to strike in public enterprises and services. The law also prohibits anti-union discrimination by employers and retribution against strikers.</p> <p>Conciliation panels with equal labor and management representation settle many labor disputes. Otherwise, representatives from the Ministry of Social Affairs, the Tunisian General Labor Union (UGTT), and the Tunisian Union for Industry, Commerce, and Handicrafts (UTICA) form tripartite regional commissions to arbitrate disputes.</p>
Worker Accommodation		<p>The development, construction and operation phases of the project are not expected to require a significant number of workers. Although the exact magnitude of workers is not yet known, and the project accommodation strategy has not been defined yet, if labor camps are going to be used the project will comply with the World Bank's Good Practice Note on Assessing and Managing the Risks of Adverse Impacts on Communities from Project-Related Labor Influx and the IFC / EBRD guidance note on worker accommodation.⁸</p>
Gender-based Violence	Law No 58 of 26 July 2017	<p>Law No 58 of 26 July 2017 on Eliminating Violence against Women adopts a broad definition of violence against women, including physical, psychological, sexual, political and economic violence, and seeks to address violence through prevention, protection, penalization of perpetrators, as well as procedures, services and institutions for women survivors.</p> <p>Under the law, the Ministry of Health is responsible for implementing GBV programs in medical trainings, provide examinations, treatments, and follow-ups to women and children residing with them, provide special units for women survivors as well as health and psychosocial services; the Ministry of Social Affairs should provide training for social intervention workers, build their capacity, provide protection services through social centers for vulnerable populations; and the Ministry of Women, Family and Childhood, is responsible for providing services at the social centers including shelter, psychological counselling, medical care and legal advice.</p>

3.5.3 Occupational Health and Safety

OHS in the workplace is regulated by many different legislative documents, including the Labor Code, special legislation on governmental institutions, specific legislation related to particular hazards in addition to specific legislation on accidents, occupational diseases, and medical services at work. Key legislation applicable to OHS includes the following:

⁸ World Bank, Good Practice Note, Assessing and Managing the Risks of Adverse Impacts on Communities from Project-Related Labor Influx, June 2021; IFC/EBRD, Workers' accommodation: processes and standards A guidance note by IFC and the EBRD, 2009.

- Law No 66-27 of 30 April 1966, promulgating the Labor Code, amendments to Law No. 96-62 of 15 July 1966 and the amendments adopted are applicable, in particular in the performance of work and in the Occupational Medicine; and Law No. 2007-19 of April 2, 2007;
- Decree No 68-328 of 22 October 22 1968 sets the hygiene rules applicable to companies subject to the Labor Code. It provides, inter alia, for an obligation to: provide all employees with drinking water in easily accessible places; post notices in plain view, when drinking water is intended for industrial operations or firefighting; keep the work premises well ventilated; to install sanitary installations in special rooms.
- Decree No 75-240 of 24 April 1975, amending Decree No 67-391 of 6 November 1967 relating to the health, safety and employment of women and children in industrial and professional trade establishments;
- Decree No. 74-320 of 4 April 1974 relating to the table of occupational diseases;
- Decree No 75-503 of 28 July 1975 regulating protection measures for workers in establishments that use electrical currents;
- Law No. 87-31 of July 06, 1987 Ratifying the ILO No 7 relating to occupational health and safety and setting out technical rules to ensure safety and protection with regard to (i) the location of the establishment; (ii) design and construction; (iii) prevention against all occupational hazards; etc..
- Order of the Ministry of Social Affairs of 5 May 1988 determining the maximum weight of loads that can be transported by workers;
- The Book of General Administrative Clauses applicable to public works contracts of 19 October 1990;
- Law No 91-39 of 8 June 1991 relating to the fight against calamities, their prevention and the organization of relief;
- Law No 94-28 of 21 February 1994 on establishing a compensation scheme for damages resulting from accidents at work and work-related illnesses;
- Decree No 95-538 of 1 April 1995, relating to the fixing of rates of contributions to the compensation scheme for injuries resulting from accidents at work and occupational diseases;
- Law No 96-63 of 15 July 1996, setting the conditions for the manufacture, export, import, transport, storage, use and marketing of explosive materials used for civilian purposes;
- Law No 97-37 of 2 June 1997 relating to the transport by road of dangerous materials;
- Decree No 2000-1985 of 12 September 2000 on the organisation and functioning of the workplace medical services;
- Decision of 5 June 2003 in relation to the list of occupational diseases;
- Order of the Minister of Industry, Energy and SMEs of 15 November 2005 establishing the nomenclature of dangerous, unhealthy establishments as amended by the Order of the Minister of Industry and Technology of 23 February 2010 and the Order of the Minister of Industry of 24 October 2012
- Decree No 2006-2687 of 9 October 2006, fixing rules, conditions for operating dangerous and unhealthy structures;
- Law No 2009-11 of 2 March 2009 promulgating the Code of Safety, Fire Prevention, Explosion and Panic Risks in Buildings;
- Technical prescription book for high voltage electrical risks: STEG;
- Special administrative clauses applicable to public works contracts obliging contractors to comply with laws and standards in relation with the protection of workers.

The Labor Code applies to industrial establishments such as extractive activities, the production of construction materials and the construction and transmission of electricity (Arts. 1-2).

Applicable ILO Conventions

Tunisia has been a member of the ILO since 1956 and has ratified some 61 international conventions, including the following:

- Workman's Compensation (Accidents) Convention, 1925 (No 17)
- Workman's Compensation (Occupational Diseases) Convention, 1925 (No 18)
- Equality of Treatment (Accident Compensation) Convention, 1925 (No 19)
- Workmen's Compensation (occupational diseases, 1934 (No 18) and 1952 (No 40)
- Benzene, 1981 (No 136)
- Occupational Cancer, 1981 (No 139)
- Working environment (Air, pollution, Noise and vibration), 1981 (no. 147 (1981)
- Chemicals Convention, 2002 (No164)
- Safety and Health in Construction Convention, 2003 (No 167)
- Promotional Framework for Occupational Health and Safety Convention, 2006 (No 187)

Key Legislation

Issue	Legal Instrument	Provision
Duty to Ensure Health and Safety of Employees	Labour Code	Article 152-2 of the Labor Code sets out employers' duties in relation to OHS, namely to protect workers' health; to guarantee suitable working conditions; to inform workers

Issue	Legal Instrument	Provision
		about the occupational risks to which they are exposed; and to raise awareness about prevention equipment and methods. Employers must also provide remedies for adverse impacts such as occupational injuries, deaths, disability and disease
Worker Obligations	Labour Code	Article 152-3 of the Labor Code specifies workers' obligations, namely to follow instructions to protect their own health and that of others; use the preventative equipment provided; undergo occupational health examinations; participate in training activities; and report any breaches.
Workplace Medicine	Labour Code	The Labor Code introduces the function of occupational safety officer to all classified enterprises and on construction sites (with more than 20 employees). Medical services at the workplace must conduct medical examinations for workers upon engagement and on a regular basis in order to ensure their protection from hazards at the workplace. Medical examinations shall occur at least once a year. In accordance with Article 289 of the Labor Code, workplace medical inspection is carried out by functionaries from the Ministry of Social Affairs. The workplace medical inspectors are responsible for ensuring compliance with OHS legislation; and overseeing the workplace medicine services (Article 291).
Hazardous Work	Labour Code	The Labor Code (Article 152 - 2) requires every employer to take the necessary measures appropriate for the protection of workers and for risk prevention, including: ensuring the protection of the health of workers at the workplace; and guaranteeing conditions that provide suitable working environment. Employers must also hire an OSH officer who is responsible for monitoring the workplace to identify sources of danger and notify the employer about it in order to prevent risks and hazards (Article 154 - 4).
Provision on Personal Protective Equipment (PPE)	Labour Code	Employers must provide PPE to workers and train them on the proper use of this equipment (Labour Code, Article 152 - 2).
Noise in the Workplace	Decree of the Ministers of Public Health and Social Affairs establishing the list of occupational diseases of 10 January 1995	The Decree of the Ministers of Public Health and Social Affairs establishing the list of occupational diseases of 10 January 1995 sets the daily noise exposure level at 85 dB(A).
First Aid and Welfare Facilities	Decision of the Minister of Social Affairs of 27 October 2003	Employers must ensure that medical services at work are equipped with first aid kits (Article 10, Decision of the Minister of Social Affairs of 27 October 2003 on regulating the system of medical departments at the workplace). The law also requires workplaces to provide suitable and adequate sanitary facilities for male and female staff to use (Decree No 66-328, Article 12).
Provision of Drinking Water and Rest and Eating Area	Decree No 66-328	Employers must provide drinking water at the workplace (Decree 66-328, Article 1). They must also provide an eating area with tables and benches (Article 14)
Handling, Storage and Use of Hazardous Substances	Order of the Ministry of Interior of 16 October 2000	Employers must comply with the provisions of the Order of the Ministry of Interior of 16 October 2000 on the modalities for the loading, unloading and transport of hazardous materials
Risks related to Machinery and Tools	Labour Code	Employers must take the necessary measures in order to protect workers from the dangers inherent in machinery, equipment and products used (Labour Code, Article 152 - 2).
Working at Heights	Labour Code	Employers must take the necessary measures in order to protect workers from the dangers related to the workplace and professional risks. This includes the obligation to ensure an adequate and safe work environment and infirming and sensitising workers to the professional risks they are exposed to (Labor Code, Article 152 - 2).

Issue	Legal Instrument	Provision
Working in Confined Spaces	Labour Code	Employers must take the necessary measures in order to protect workers from the dangers related to the workplace and professional risks. This includes the obligation to ensure an adequate and safe work environment and infirming and sensitising workers to the professional risks they are exposed to (Labour Code, Article 152 - 2).
Training of Workers	Labour Code	In accordance with the Labour Code, employers must provide for the regular training and sensitisation of workers in relation to OHS issues and risks (Articles 160, 161, 338).
Risks of Electrocutation	Decree No 75-503 of 28 July 1975	Decree No 75-503 of 28 July 1975 provides for the periodic inspection of electrical installations in industry by the Ministry of Social Affairs in regard of the safety of workers in establishments constructing electrical power transmission systems. In the absence of national standards, international standards and applicable STEG standards apply.
Noise Norms and Standards		Noise emissions are covered by the regulations relating to worker health and safety and applicable health codes in force for the different professions. Tunisia does not yet have standards relating to noise pollution. However, the municipality of Tunis has implemented a municipal circular setting the tolerable threshold according to the time and the area, in accordance with the table in the appendix.
OHS Exposure Limits	Labour Code	In accordance with the Labour Code and related legislation, employers must assess worker exposure against internationally published occupational exposure limit values, such as the Threshold Limit Values (TLV®) guidelines. Among the other indicators that specifically concern electricity transmission and distribution activities, the minimum working safety distances for employees with the required training must be respected.
Method of Carrying Out the Work		The execution of the various works must comply with the specifications of the technical clauses proposed by STEG, relating to the studies, the construction in the factory, the supply, the transport on site, the assembly, the tests and the commissioning of the electricity lines and stations.

					ELMED Etudes SARL
Contractor Doc No: LM-01		Date 2023-04-12	Pag. 20 of 37		

4. ROLES AND RESPONSIBILITIES

STEG will be the implementing agency (IA) of the proposed project. It is responsible for overseeing all aspects of the implementation of the LMP, including the induction, training and monitoring of LWC/OHS of workers employed in the project and ensuring contractor compliance. STEG will address all LMP aspects as part of procurement for works and during contractor induction. Overall responsibility for LWC/OHS issues within STEG will line with the HSE Department.

Direct project workers will be contracted by the IA. Contracted workers will be engaged through contractors and service providers. Primary supply workers may be employed by suppliers contracted to the IA or to works contractors. Contractors will be required to write, adopt and implement their own LMP (Contractor's LMP), in accordance with clear and Bank-approved criteria established by the borrower, as part of the bidding document and contract before employing any labor for the Project. Contractor LMPs will cover professional staff, full-time technical and manual workers, and casual employees, implementation of which will be supervised by the IA.⁹

STEG and its contractors will engage a minimum number of LWC/OHS focal points who are responsible for the implementation of the LMP and for compliance with LWC/OHS safeguard requirements. These are to ensure day-to-day compliance with specified LWC/OHS measures throughout the project. They are also responsible for the taking of records of any incidents, in accordance with the Project's incident reporting system. Minor incidents are to be reported to the IA on a monthly basis, serious incidents will be reported immediately. Minor incidents will be reflected in the quarterly reports to the World Bank, whereas major issues will be immediately notified to the World Bank within 48 hours. As such the LWC/OHS focal point is responsible for the following tasks:

- Leading and coordinating the planning, development and implementation of LWC/OHS policies and the assessment and effective management of LWC/OHS risks related to project activities. This includes reviewing LWC safeguard frameworks and plans in collaboration with relevant government agencies, monitoring LMP and ESMP implementation, and monitoring the project's compliance with safeguard policies throughout the project duration;
- Carrying out labor accommodation inspections and audits;
- Ensuring the GRM for project workers is established and implemented and that workers are informed of it;
- Engaging and managing contractors in accordance with this LMP and the applicable Procurement Documents;
- Ensuring contractors prepare LMPs that comply with this LMP and Contractor's ESMP (including OHS provisions) for approval before the contractor is allowed to mobilize to the field;
- Monitoring that contractors meet obligations towards contracted workers as included in the Contractor LMPs, Contractor ESMPs and the applicable Procurement Documents;
- Monitoring for potential risks of child and forced labor and serious safety issues in relation to primary supply workers;
- Preparing and overseeing the training of relevant project workers in regard to LWC/OHS issues;
- Monitoring the implementation of the Worker Code of Conduct and any other measures to address risks of sexual exploitation and abuse (SEA)/sexual harassment (SH);
- Reporting to the World Bank on LWC/OHS performance and the LMP implementation on a regular basis.

STEG's HSE Department will prepare training materials and awareness raising materials for LWC/OHS risk management and will ensure that required training is delivered to workers and contractors. STEG will report on the delivery and effectiveness of the training program to the World Bank.

STEG will develop a list of LWC/OHS criteria that need to be covered by the contractor LMPs prior to contracting and will monitor the implementation of the contractor LMPs (see **Section 1.4** above). In support of this it will prepare a series of standards and procedures that clearly communicate the Project's LWC/OHS objectives. These will be appropriate for the works and specific to the LWC/OHS issues, risks and impacts of the Project.

Contractors, for their part, will be responsible for the following:

⁹ In the event that community members are engaged by the contractor (e.g. unskilled workers), these would be considered as "Contracted Workers" under ESS2.

- Appointing qualified LWC/OHS expert(s) to manage LWC/OHS issues;
- Preparing and implementing their LMPs (Contractor’s LMP and ESMPs, including OHS provisions) which will apply to contracted workers. These procedures and plans will be submitted to the IA for approval before the contractor is allowed to mobilize to the field;
- Supervising their subcontractors’ adherence to the LMP and ESMP;
- Maintaining records of recruitment and employment of contracted workers (including subcontractors) with age verification to avoid child labor;
- Providing induction and regular training to contracted workers on LWC/OHS issues, including in regard to the prevention of Gender-Based Violence (GBV);
- Requiring the primary supplier to identify and address risks of child labor, forced labor and serious safety issues, and risks of equity and discrimination for primary supply workers;
- Developing and implementing the GRM for contracted workers, including ensuring that grievances received from contracted workers are resolved promptly, and reporting the status of grievances and resolutions;
- Ensuring that all contractor and subcontractor workers understand and sign and comply with the Code of Conduct prior to the commencement of works, and take all other measures to address risks of SEA/SH as specified in the contractor’s LMP/ESMP and supervise compliance with such measures;
- Report to the IA on LWC/OHS performance.

Monitoring will include inspections and/or spot checks of work sites and/or of labor management records and reports compiled by the contractor. For more details, see **Section 8** “Contractor Management”. A summary of the Project roles and responsibilities is set out below in **Table 2**.

Table 2. Summary of Key Roles and Responsibilities

Key Issues	Direct Workers	Contracted Workers	Primary Supply Workers
Hiring and Managing Individual Project Workers	<ul style="list-style-type: none"> - IA to engage/manage Construction and Supervision consultant - IA to supervise and ensure that contractors are complying and enforcing the application of the LMP to the project’s contracted and primary supply workers 	<ul style="list-style-type: none"> - Contractor/Subcontractor (site manager and/or OHS officer) 	<ul style="list-style-type: none"> - n/a (outside the scope of ESS2)
OHS	<ul style="list-style-type: none"> - n/a (direct workers will follow OHS measures when visiting construction sites) 		<ul style="list-style-type: none"> - Contractor to require the primary supplier to identify/address child labor/forced labor and serious safety risks. - IA/Construction and Supervision consultants to review
Child and Forced Labor	<ul style="list-style-type: none"> - n/a (the contract for direct workers does not allow child labor and forced labor) 		<ul style="list-style-type: none"> - n/a (outside the scope of ESS2)
Training	<ul style="list-style-type: none"> - IA/CSC 		
Code of Conduct	<ul style="list-style-type: none"> - n/a (the contract for direct workers will address relevant risks) 		
Grievance Redress Mechanism	<ul style="list-style-type: none"> - IA/Construction and Supervision consultants 	<ul style="list-style-type: none"> - Contractor and PMU/Construction and Supervision consultants 	
Monitoring and Reporting	<ul style="list-style-type: none"> - IA/Construction and Supervision consultants to monitor and report to World Bank 	<ul style="list-style-type: none"> - Contractor to monitor and report to CSC/IA - CSCs consultant to monitor and report to IA - IA will provide consolidated report of the whole project to the World Bank 	<ul style="list-style-type: none"> - Contractor to monitor and report to IA - IA/Construction and Supervision consultant to monitor and report to World Bank

5. KEY POTENTIAL LABOR RISKS

5.1 Key Labor Risks

The labor risk profile of the Project is rated as Substantial because of the potential for employment practices that are non-compliant with either Tunisian labor legislation or with the provisions of ESS2. Common labor management practice for management of manual workers and laborers, particularly in the construction industry, may result in exposure of workers to risks including:

- Unclear terms and conditions of employment (e.g. absence of documents of assignments, wages not proportionate with tasks performed or industry standards, unlawful termination and withholding of benefit etc.);
- Excess workload without provision of adequate rests and leisure, lack of hygiene facilities;
- Denial of workers' rights to organize;
- No access to a grievance redress mechanism;
- Likely presence of migrants or seasonal workers;
- Possible accidents or emergencies, with reference to the sector or locality;
- Risk of child labor;
- Risk of gender-based violence (GBV) and sexual harassment;
- Discrimination against legal immigrants and foreign workers

Common OHS risks that occur in infrastructure projects of this nature include:

- Slips and falls;
- Working at heights;
- Driving vehicles / traffic accidents;
- Strikes by objects;
- Operating heavy machinery;
- Working in confined spaces and excavations;
- Exposure to chemicals, hazardous or flammable materials;
- Electric and magnetic fields;
- Exposure to electric shocks and burns when touching live power components;
- Lack of OHS work procedures; and
- Poor understanding and implementation of OHS requirements.

There will also be activities such as the construction of access roads and related project infrastructure sub-projects, which will mainly be carried out by contracted workers including supervisory, technical, semi-skilled and nonskilled workers of construction contractors, and supervising engineers who will be professional staff of service providers.

Contractors will be required to prepare a site-specific LWC/OHS plan for site works that address the risks identified. The LMP will be prepared in accordance with the criteria defined by STEG and include, inter alia, details on the following:

- Information on emergency measures and plans, communication protocols, first aid instructions and facilities, training programs, OHS culture, inspection programs, monitoring and reporting requirements, incident management, etc.
- Activities that are expected for the Project (e.g. civil works, electrical wiring, tower assembly, electrical installation, commissioning, etc.) and lists the specific jobs which are to be undertaken under each activity and the hazards which may be associated for each (electric hazards, working with machinery, vertical works, etc.);
- For each of the activities above, the LMPs are expected to identify the preventive equipment and systems that must be in place to eliminate or reduce such risks. This includes: (i) collective protective equipment (safety signs, traffic signs, hand signs, marking and signalling of work in progress, etc.); (ii) personal protective equipment (this includes the compulsory equipment for any worker or visitor onsite and obligatory equipment based on the tasks being carried out) (iii) detailed safety measures on how the task should be implemented in a safe manner to reduce any occupational health and safety risks.

Most OHS issues during the construction, operation, maintenance, and decommissioning of electric power distribution projects are common to those of large industrial facilities, and their prevention and control is discussed in the World Bank's General EHS Guidelines.

					
Contractor Doc No: LM-01		Date 2023-04-12	Pag. 23 of 37		

STEG and its construction contractor(s) will adopt and implement the recommendations/provisions of this LMP throughout the Project construction phase. This will also be implemented for all maintenance activities for high voltage electricity lines in Tunisia. In support of this and as part of contractor management, STEG will implement a Supply Chain Management Plan.

There is also the risk of poor LWC related to the onshore infrastructure components, such as the potential for impacts on communities related to the influx of workers for the civil works during the construction phase, depending on the number and origin of the workers. These details have yet to be defined, although the overall number of workers is not thought to be substantial (ca. 150-200). It is also not yet known whether project workers will be housed in camps or in the communities along the route, where they are from and what the specific risk profiles for the different work components are. This information will only be available at the contracting stage, at which point this LMP will be updated accordingly. This information will also inform the contractor-specific LMPs.

All these issues will be addressed by STEG on the basis of Tunisian regulations, STEG standards and procedures, good industry practice, the provisions of ESS2 and the World Bank EHS Guidelines, and the provisions of relevant World Bank's good practice notes (e.g. on labor influx). There is also the potential for community health and safety issues, especially alteration of power dynamics, shifting the economic power balance, rise of communicable diseases. Similarly, in the event of labor camps being used, there is the risk of the generation of solid, liquid and fecal wastes, including around toilet areas.

There are also OHS risks associated with the laying of the **marine cable**, the **operation of vessels** and working in the **marine environment** which must be addressed. Whereas the offshore portion of the Project is likely to be carried out by international contractors familiar with international maritime and related OHS procedures,¹⁰ and there are unlikely to be local workers involved in this part of the Project, ESS2 and this LMP apply to the contractor/service provider for marine cable works, alongside all other E&S instruments of this Project, including in relation to gender-related issues such as shipboard sexual harassment and bullying against seafarers, which is a recognised issue in the maritime industries.

5.2 Other Risks

Unfair Treatment and Discrimination

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

Wages, Deductions and Benefits

Non payment or withholding of wages is a generic risk associated with projects of this nature in Tunisia, especially where contractors and sub-contractors are involved. In accordance with ESS2 (Section 11) and the Labor Code, measures will need to be adopted to ensure that project workers are paid on a regular basis and that any deductions made are explained to workers in advance, in accordance with national law. Provisions will also need to be made to ensure that workers are provided with adequate periods of rest per week, as well as their statutory entitlements to annual holiday, sick, maternity and family leave.

Supply Chain Risks

The use of a supply chain introduces the potential for labor violations to occur. This includes, for example, poor working conditions, a lack of written worker contracts, low-levels of OHS, child labour, forced labour, other forms of labor-related exploitation, as well as incidence of GBV and/or SEA/SH.

¹⁰ Marine cable laying is a specialist activity with only few international companies qualified to perform these works and there are unlikely to be any local workers involved in the offshore construction activities.

					ELMED Etudes SARL
Contractor Doc No: LM-01		Date 2023-04-12	Pag. 24 of 37		

Forced Labor and Restriction of Child Labor

While no evidence of child labor or forced labor has been observed or reported in relation to works contracts in STEG, and child and forced labor is outlawed in Tunisia, a risk remains that child labor could occur. Child labor, including forced labor in domestic work and begging, is still prevalent in parts of the country. Children also perform dangerous tasks in scavenging for garbage and in street work, sometimes as a result of human trafficking. According to a 2017 survey conducted by the Government on child labor, nearly 8% of all children are engaged in child labor, roughly 63% of whom were engaged in hazardous work.¹¹ Children also perform dangerous tasks in agriculture and street work and the number of children dropping out of school, which may make them more vulnerable to child labor, remains high.

Note: Refugees and migrants, who lack legal documentation, including child migrants from sub-Saharan African countries and those fleeing unrest in neighboring countries, are also vulnerable to labor exploitation because refugees and migrants do not have the status to legally work in Tunisia.¹²

Gender Issues

There is the potential for discrimination against women or members of other groups (e.g. workers with disability). In spite of progress in legislation to reduce gender inequality and the expansion in female education (particularly tertiary education), Tunisia still has low participation of women in the labour force, with women's share of the labour force not surpassing 25% (National Institute of Statistics). In fact, Tunisia ranks 95th out of 189 countries in regard to the global gender gap (UNDP Human Development Index 2018). This is reinforced by cemented gender roles within the family, which have a negative effect on women's labour market participation. These are issues that the Project will need to address, in collaboration with its contractors and the Government.

GBV and SEA/SH Risks

GBV is a known risk in Tunisia. GBV risks related to management of project workers might include: potential risks to women project workers travelling in remote areas (management of this risk should not result in any discouragement of employment of women in relevant capacities); and potential risks of GBV committed by contractors' workers, including those temporarily resident in site camps for construction works.

Although there are no official statistics available on the level and extent of sexual harassment, evidence suggests that women are often subjected to sexual harassment in public institutions and in the workplace. Violence against women and girls is also a concern: according to the first national survey on violence against women in Tunisia (ENVEFT) in 2010, violence against women appears to be increasing.

There is also the risk of sexual harassment in the context of the marine component of the Project. The Project will need to monitor for this and adopt suitable mitigations. The Project will in particular have to make sure that marine contractors have adequate safeguards that meet the World Bank standards in this area, including the provisions set out in the Good Practice Note on Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Finance involving Major Civil Works, 2nd Edition, 2020. For further information, please also see the associated SEA/SH Action Plan prepared for the Project.

¹¹ Enquête nationale sur le travail des enfants en Tunisie de 2017 / Bureau international du Travail, Service des Principes et droits fondamentaux au travail (FUNDAMENTALS), Institut National de la Statistique de la Tunisie (INS); République tunisienne - Tunis: BIT, 2018.

¹² Ibid.

    	ELMED Etudes SARL	
Contractor Doc No: LM-01	Date 2023-04-12	Pag. 25 of 37

6. POLICIES, PROCEDURES AND RISK MITIGATION MEASURES

6.1 Introduction

STEG is responsible for managing and controlling the activities that may pose LWC/OHS related risks to Project workers and host communities. In recognition that much of the work will be carried out by contractors, contractors will be required to prepare contractor-specific LMPs, which must comply with the STEG LMP and be approved by STEG. STEG will adopt and have overall responsibility to ensure compliance with the following instruments:

- Terms and Conditions for Employment of Project Workers¹³;
- Procedures on Child and Forced Labor;
- OHS standards for Direct Project Workers and Contractor Workers;
- Workers' Grievance Redress Mechanism.

Project-specific policies will be adopted where gaps exist, based on existing STEG procedures and standards and applicable international standards, World Bank requirements and Tunisian law. For example, STEG will be working to ISO 45001, which specifies requirements for an occupational health and safety (OH&S) management system intended to improve the safety and health of employees and other personnel. STEG will also be working to ISO 26001 (Social Responsibility). STEG will also adopt and disseminate a project-specific hiring policy and will ensure that all contractors abide by this policy. Said policy will reiterate the principle of non-discrimination against all workers, including foreign workers who have a right to live and work in Tunisia.

6.2 Code of Conduct

STEG will prepare a project-specific Worker Code of Practice. The Code of Conduct will build on STEG's existing Code Ethics and Values. Relatedly, STEG will require contractors to prepare a contractor-specific Worker Code of Practice. The Code of Conduct will comply with the provisions of ESS2 and include specific provisions on GBV, sexual exploitation and abuse (SEA) and sexual harassment (SH).¹⁴

6.3 Terms and Conditions of Employment

The terms and conditions of employment in Tunisia are governed by the provisions of the Labor Code and subsidiary legislation. Accordingly provisions will be made in regard to:

- **Direct and Contracted Workers:** The terms and conditions for direct workers in STEG will be governed by the Tunisian Labor Code and the Standard World Bank Consultancy Contract for PIU consultants. The Standard World Bank Consultancy Contract is, however, not applicable to contracted workers such as construction workers
- **Provision of written individual contract of employment:** A written individual contract of employment will be provided to workers specifying the following: (a) name of workers; (b) address, occupation, age and sex of workers; (c) employer's name and address; (d) nature and duration of contract; (e) hours and place of work; (f) remuneration payable to the worker; (g) procedure for suspension or termination of contract. Depending on the origin of the employer and the worker, employment terms and conditions will be communicated in a language that is understandable to both parties. In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulty understanding the documentation. A register of workers including details of all workers engaged also is mandatory to be maintained by the employer. Leave Procedures for both permanent and temporary workers.
- **Notice for termination of contract:** Either of the contracting parties may terminate a contract of employment by giving written notice as under: (a) not less than ten days in the case of manual workers; or (b) not less than 30 days in the case of non-manual workers. No notice needs to be given in case the duration of contract does not exceed one month.

¹³ This includes foreign workers who have the right to live and work in Tunisia

¹⁴ STEG has also started certifying some of its facilities to ISO 26001 and ISO 45001. This will provide a basis for STEG's approach to managing LWC issues going forward.

- **Hours of Work:** In accordance with Article 79 of the Tunisian Labor Code, the normal hour of work of a project worker shall not exceed 8 hours a day or 48 a week. Hours worked in excess of the normal hours of work shall not exceed 12 hours a week and shall entitle a worker to a proportionate increase in remuneration. Every worker shall be entitled to one day's rest each week. The rest shall consist of at least 24 consecutive hours each week. Workers shall also be entitled to rest on public holidays recognized as such by the State. Workers are also entitled to a rest hour (1 hour for more than 6 hours of work), overtime work (more than 8 hours a day with twice the rate of normal working hour), working hour for women (no work between 10 PM to 6 AM without her consent).
- **Annual Leave:** In accordance with Tunisian labor law, full time workers are entitled to one (1) day leave per month, with the total duration of 15 calendar days (12 working days) of annual leave with pay for every year of continuous service. An entitlement to leave with pay shall normally be acquired after a full year of continuous service. As for contractor workers, this will be a matter for the contractors.
- **Maternity leave:** Female workers are entitled, on presentation of a medical certificate indicating the expected date of her confinement, to six-months maternity leave. During maternity leave, the female employee is entitled to maternity benefits as regulated by applicable Tunisian legislation.
- **Wages and Deductions:** While the mechanism to set the official minimum wage is prescribed by the Government, the fair market rate will be identified and applied for Project workers and contractors, in accordance with the applicable collective bargaining arrangements. No deductions other than those prescribed by the Labor Code or regulations made thereunder, or any other law or collective labor agreement will be made from a worker's remuneration, except for repayment of advances received from the employer and evidenced in writing. Contractors shall not demand or accept from workers any cash payments or presents of any kind in return for admitting them to employment or for any other reasons connected with the terms and conditions of employment. The wages of a worker must be paid before the expiry of the seventh working day following the last day of the wage period in respect of which the wages is payable). the cases where deductions may be made from wages. Contractors (employers) must abide by the applicable minimum wages rate and any other provisions by Government such as hours of work, overtime pay, leave entitlements, travelling and subsistence allowances and the issue of protective clothing.
- **Disability / Work Injury Benefit:** Under Tunisian labour law, work injuries are divided into four categories: (i) permanent total incapacity (ii) permanent partial incapacity (iii) temporary incapacity and (iv) fatal injury leading to death of a worker. Work injury includes any accident that occurs while commuting to and from work.

In case of permanent disability, the insured worker is entitled to annual earnings multiplied by 0.5 times the assessed degree of disability from 15% to 50% and by 1.5 times for the portion greater than 50%. The annual earnings used to calculate benefits ranges from legal annual minimum wage to six times the legal annual minimum wage. The permanent disability pension can be paid as a lump sum after receiving a benefit for a five-year period for an assessed degree of disability of 35% or less. The lump sum is calculated according to a schedule in law. For an assessed degree of disability of 5% to 15%, a lump sum of 150% of the annual earnings used to calculate benefits multiplied by the assessed degree of disability is paid.

In case of temporary disability, amount of benefit paid is equivalent to 66.7% of the insured's highest average daily wage in the highest quarter of the last four quarters before the disability began. It is paid after a three-day waiting period (after one day if hospitalized) until full recovery or certification of permanent disability.

In case of a fatal injury of a worker during his contract of employment, Tunisian labour law provides for dependents (widow/ widower, children, parents) to receive a survivors' pension. 50% of the insured's annual earnings is used to calculate the permanent disability pension the deceased received or was entitled to receive is paid to a widow(er) without children and 40% is paid in case of one or more children. The pension ceases on remarriage. The legislation further provides that an orphan is entitled to 20% of the insured's annual earnings used to calculate the permanent disability pension the deceased received or was entitled to receive, 30% for two, or 40% for three or more orphans; and 50% for one full orphan, 60% for two, 70% for three, or 80% for four or more full orphans. Pension is paid to an orphan only if he/she is younger than 16 years of age (21 years if a secondary or professional school student; 25 years if a university student, no limit if disabled or an unmarried daughter without income). In case there is no surviving widow(er) or child, 20% of the insured's annual earnings is used to calculate the permanent disability pension the deceased received or was entitled to receive is paid for each dependent parent, grandparent, and grandchild, up to 50% of the annual earnings. All survivor benefits combined must not exceed 80% of the deceased's earnings.

					ELMED Etudes SARL
Contractor Doc No: LM-01		Date 2023-04-12	Pag. 27 of 37		

- **Medical treatment of injured and sick workers:** All workers must be covered by insurance against occupational hazards. It is the duty of the employer to pay full wage as stipulated in the employment contract to the employee suffering from occupational accidents or occupational diseases during medical leave for medical treatment.
- **Collective Agreements:** Where collective agreements exist between the employer and project workers, such agreements will be applied, where relevant. The right workers shall, without distinction whatsoever, have the right to form trade union primarily for the purpose of regulating the relations between workers and employers, or between workers and workers and, subject to the constitution of the union concerned, to join trade union of their own choice.
- **Labor disputes over terms and conditions of employment:** To avoid labor disputes, fair terms and conditions will be applied for project workers in the SFDP (more details are provided in Chapter 9). The Project will also have grievance mechanisms for project workers (direct workers and contracted workers) in place to promptly address their workplace grievances (more details are provided in Chapter 10). Further, the Project will respect the workers' right of labor unions and freedom of association, as set out in the national Labor Code (Chapter XIII, Trade Union).

As a monitoring mechanism, a contractor shall not be entitled to any payment unless he has filed, together with his claim for payment, a certificate: a) stating whether any wages due to employees are in arrears; b) stating that all employment conditions of the contract are being complied with. It will be a material term of the contract to allow PMU to withhold payment from contractor should the contractor not fulfill their payment obligation to their workers.

Note: Contractors will be working under the terms of STEG's general contracting regulations, which set out provisions on coverage of risks and insurance. The contractor is responsible for insurable work-related risks, cross liability, social security, transport-related coverage, construction etc. The responsibility of the contractor is limited to the value of the contract. These provisions apply for the full duration of the works, from the opening of the work site through to the completion of works.

6.4 Site-Specific Labor Management Plans

For each project segment, a site-specific LMP will be prepared. Where significant risks are identified as part of the project safety management system, suitable LWC/OHS mitigation measures will be prepared as needed. STEG will develop and adopt a Community LMP if necessary.

Relatedly, the Project will engage with local communities and contractors from the area on the LWC/OHS risks involved during the construction and operations phase, for example the procedures to follow in case of road works and other agricultural works along the RoW of the OHL, avoiding works close to the line and what to do in the case of an emergency. Engagement on these issues will be carried out in line with the provisions of the Project SEP.

6.5 Direct Project Workers

STEG will establish LWC/OHS criteria for all direct project workers. The strategy will identify potential LWC and OHS risks associated with Project work. Project direct workers will be consulted for their inputs and OHS concerns. The LWC/OHS Strategy will identify appropriate mitigation measures. The LWC/OHS Focal Point will be in charge of the Strategy and will update it as needed. The Strategy will include a reporting system with a register of OHS incidents (accidents and other incidents affecting workers' health and safety) which will be centrally maintained by the Focal Point.

The Strategy will include specific measures to ensure the safety of workers travelling to remote sites, including (1) project cars to be driven by professional drivers only; (2) travel for project-related purposes to be in daylight hours only; and (3) measures to monitor, anticipate and avoid potential security risks while travelling, including liaison with local police and authorities and encouraging project workers to share any concerns they may have.

Project workers will receive health and safety training. Site-specific risks will be assessed as part of the ESMP which will include plans for emergency evacuation and identification of emergency health facilities. Terms and Conditions for Employment of Direct Project Workers will require that all IA to adopt and monitor a non-discriminatory hiring policy. Implementation will be monitored by STEG. The Terms and Conditions for Employment of Direct Project Workers will reaffirm the rights of all project workers under Tunisian Labor Law and ESS2, including the right to organize.

					
Contractor Doc No: LM-01		Date 2023-04-12	Pag. 28 of 37		

6.6 Contracted Workers

LWC/OHS criteria will be included in contract documentation for all contracts under which contracted workers will be employed. Compliance with the LWC/OHS specifications will be mandatory and will be verified by the supervising official or engineer. The LWC/OHS criteria will include the following provisions:

- Ensuring LWC/OHS standards in full compliance with ESS2, applicable international standards and Tunisian law, at a minimum, mirroring the provisions for Project Workers set out above, including (1) basic safety awareness training to be provided to all persons as a pre-condition for presence at an active construction site; (2) all vehicle drivers to have appropriate licenses, and all construction equipment operators to be trained including in safety procedures; (3) Safe management of the area around operating equipment; (4) all workers on construction sites to be equipped with hard helmets, safety boots and protective gloves; (5) secure scaffolding and fixed ladders to be provided for work above ground level; (6) first aid equipment and facilities to be provided in accordance with Tunisian Labor Law; (7) at least one supervisory staff trained in OHS procedures to be present at all times when construction work is in progress; and (8) adequate provision of hygiene facilities, resting areas etc.;
- All workplace OHS incidents to be properly recorded in a register which will be shared with the supervising engineer. The format for this register will be provided and will include (1) time and place of incident; (2) type of incident; (3) type of injury or other impact occurring, and number of workers affected; and (4) actions taken (first aid, evacuation etc.);
- All workers to be covered by insurance against occupational hazards;
- All work sites to have a OHS plan including identification of potential hazards and actions to be taken in case of emergency, including location of accident and emergency facilities;
- Any on-site accommodation to be safe and hygienic, including provision of an adequate supply of potable water, washing facilities, sanitation, accommodation and cooking facilities. Location and layout of site camps to be agreed with construction supervisors and risk assessment conducted. The EBRD / IFC Guidance Note on Workers' Accommodation: Processes and Standards (in the event labor camps are used) should be used as a benchmark for acceptable quality of on-site accommodation for contracted workers;
- Workers residing at site accommodation to receive training in preventing prevention of infection through contaminated food and / or water and or through vector-borne diseases; and in avoidance of sexually transmitted diseases;
- Fair and nondiscriminatory employment practices. Where contractors hire workers from the neighboring communities, disadvantaged and vulnerable community members are to have equal access to opportunities. Where large numbers of community members are employed, childcare facilities to be provided;
- No children will be employed, in accordance with STEG policy;
- All employees to be aware of their rights under Tunisian Labor Code, including the right to organize;
- All employees to be informed of their rights to submit a grievance through the Worker Grievance Mechanism;
- Monitoring compliance with the LWC/OHS Specification including LMP requirements will be treated as a core component of contract supervision which will be the responsibility of the supervising engineer (works contracts) or supervising project official, who may be staff of any of the project IA or partners agencies. Certification that these conditions have been complied with will be a condition for release of payment. In any case where breach of these conditions is identified, the focal point will issue a written notice instructing corrective action. In case of a serious and immediate risk to health and safety in construction works, works on the site will be suspended until the corrective action is taken. In less urgent cases, works on the site will be suspended after 7 days if the corrective action has not been taken;
- Where project beneficiary communities are engaged as contracted workers, the responsible IA, in consultation with the Commune Council and/o community leaders will adopt additional measures to ensure that vulnerable and disadvantaged members of the community have the opportunity to benefit. These measures will be implemented by Commune Councils and community leaders with the support of the Project Team. The LWC/OHS Focal Point will monitor and report on employment of workers from the project beneficiary communities. Reporting will include details of age group, gender, ethnicity and employment of people with disabilities.

6.7 Primary Supply Workers

The coverage of ESS2 in regard to primary supply workers, to the extent they are employed on the Project, is limited to child labor, forced labor and serious OHS risks. The provisions on child and forced labor are the same and will comply with the requirements of ESS2 and Tunisian labor law. The Project will identify potential risks of child labor and forced labor and serious safety issues which may arise in relation to primary suppliers.

					ELMED Etudes SARL
Contractor Doc No: LM-01		Date 2023-04-12	Pag. 29 of 37		

Compliance with these provisions is to be considered as a condition of any contract or sub-contract within STEG scope of activities. For primary supply workers of suppliers to construction contractors, compliance will be included in the obligations of the contractor, as outlined above. Project PMU/IA will be responsible to ensure compliance of suppliers from whom they purchase directly.

Primary suppliers for the Project will mainly be construction material (brick, cement, rods etc) suppliers, Electrical and Sanitary Equipment suppliers, HVAC equipment (AC, Ventilation etc), IT and communication Equipment suppliers etc. Manufacturers of Electrical, Mechanical and Plumbing (MEP), HVAC and IT / Communication equipment industries are not known to involve significant risks of child labor and forced labor. It is expected, that these primary suppliers will be large scale international companies.

In case of construction material suppliers, Contractors are required to carry out due diligence to identify if there are significant risks that the suppliers are exploiting child or forced labor or exposing worker to serious safety issues. In instances where foreign suppliers are likely to be contracted, the Contractor will be required to inquire during his/her procurement process whether the supplier has been accused or sanctioned for any of these issues and also their corporate requirements related to child labor, forced labor, and safety. If there are any risks related to child and forced labor, and safety identified, the Contractor will notify PMU and will address these risks and may avoid such suppliers, where possible.

6.8 Age of Employment

The minimum age for employment for any category of project worker is 18; children under the age of 18 will not be employed as project workers under any circumstances. Direct suppliers of materials to the project will be required to comply with Tunisian law regarding employment of child labor, in production, handling and transport of any materials supplied to the project or to its contractors. The IA will be responsible to verify and monitor the age of project direct workers before start of employment. Normally this will be done through a check of national ID cards.

To prevent engagement of under-aged labor, all contracts shall have contractual provisions to comply with the minimum age requirements including penalties for non-compliance. The contractor is required to maintain labor registry of all contracted workers with age verification. Contractors will be required to verify and identify the age of all workers. The contractors are required to maintain labor registry of all contracted workers with age information.

Age verification age shall be undertaken prior to the engagement of labor and be documented based on the workers ID or other relevant legal documents. This will require workers to provide official documentation, which could include a birth certificate, national identification card, passport or relevant legal documents. If a minor under the minimum labor eligible age is discovered working on the project, measures will be taken to immediately terminate the employment or engagement of the minor in a responsible manner, taking into account the best interest of the minor.

Contractors will be responsible to verify and monitor the age of contracted workers. Supervising officials and engineers may request proof of age of any worker suspected to be under 18. All direct supplies to the project will be informed that compliance with the Tunisian Labor Code provisions on child labor and World Bank's requirements under ESS2 are mandatory condition of the contract.

Verification may be undertaken by either: direct inspection of the premises of the contractor or supplier; or provision of a certificate issued by Ministry of Social Affairs, certifying that the premises of the contractor/supplier has been inspected and no breaches of Tunisian law on child labor or forced labor have been found. A breach of these minimum age of employment provisions by a contractor, if intentional or arising from a failure to carry out mandatory checks, will lead to cancellation of the contract. A breach by a contractor, if intentional or arising from a failure to carry out mandatory checks, will lead to termination of the contract.

If it is established that the breach occurred despite the contractor, supplier or partner agency conducting mandatory checks in good faith (e.g. the worker submitted false evidence of age) the contract or partnership agreement will be suspended until full and effective compliance with prohibitions on child labor and forced labor has been verified. Further payment for any part goods supplied or works or services completed with the use of child labor or forced labor will be withheld. These provisions will be included in the LMP to be adopted by STEG and enforced in all components of the Project. Any case of breach of child labor and forced labor restrictions are considered as severe incidents and as such must be notified to World Bank Task Team Leader within 48 hours. World Bank will have the right to review the adequacy of any sanctions applied.

					ELMED Etudes SARL
Contractor Doc No: LM-01		Date 2023-04-12	Pag. 30 of 37		

6.9 Labor Influx

Although the overall number of workers on the project is not expected to be significant (estimated at ca. 300 workers during construction and 25-30 workers during operations), there is still likely to be a degree of labor influx. In an effort to reduce the impacts associated with labor influx, as well as to provide temporary or more long-term employment opportunities to some of the affected communities, the borrower will require contractors to recruit construction workers from the country, with preference given to recruitment of workers from Project-affected communities.

However, the contracting details and provisions in terms of project employment, labor sourcing and accommodation have yet to be determined. It is thus difficult to specify the precise nature of labor influx, including the required number of workers, any fluctuation in hiring (i.e. whether workers will be hired at the same time or in small groups). Similarly, the project accommodation strategy (i.e. whether workers will be accommodated in worker camps or if the project will follow a distributed accommodation model) has yet to be determined. These details will be defined in the next phase of project planning.

To this end, the borrower will carry out an Influx Context Review and on that basis define the Project's Accommodation Strategy and prepare a Project Influx Management Plan. The purpose of the Influx Context Review is to describe the external context of the Project and the surrounding communities as it relates to project-induced immigration and labor influx to build an understanding of the magnitude of existing and potential future influx and set out how influx and associated impacts and risks can be prevented, mitigated, managed and monitored. The borrower will moreover abide by the World Bank's Good Practice Note on Assessing and Managing the Risks of Adverse Impacts on Communities from Project-Related Labor Influx.

The borrower will also abide by applicable Tunisian legislation on labor and working conditions, as specified below, noting that in the case of conflict between World Bank standards (notably ESS2) and Tunisian legislation, the more stringent takes precedence. Applicable Tunisian legislation includes inter alia: the CCAG: cahier des clauses administratives générales applicables à marchés publics de travaux (general administrative clauses applicable to public work places); the CCAP: cahier des clauses administratives particulières selon les marchés (particular administrative clauses); the CCT: cahier des clauses techniques particulières (specific technical clauses); Décret du 24 novembre 1882 qui concerne l'occupation temporaire de la voie publique lors de l'installation du chantier (Decree of 24 November 1882 on temporary works on public roads in connection with building sites); Code du travail Tunisien: Loi n° 66-27 du 30 avril 1966, portant promulgation du code du travail (Tunisian Labor Code); and the Arrête du monsieur le ministre de l'environnement et de l'aménagement du territoire du 28 février 2001, portant approbation des cahiers des charges relatif au déversement des eaux usées autre que domestiques dans le réseau public d'assainissement (Administrative Order of the Minister of Environment and Spatial Planning of 28 February 2001, approving work clauses on the discharge of waste water other than grey water into the public sanitation network).

Since the risks of communicable diseases, SEA/SH / GBV, illicit behavior and tensions with the local communities cannot be excluded, a requirement to carry out a prior SEA/SH Risk Assessment will likely be included in the Terms of Reference for the contractors (see SEA/SH Action Plan). Provisions will also be included in the bidding and contractual documents to ensure that the civil works comply with core labor standards, applicable environmental and social considerations, and that the contractors will put in place a Code of Conduct for their management and labor force.

To minimize the labor influx, STEG will require contractors to preferentially recruit unskilled labor from the local communities for simple works such as excavation, leveling, cleaning, load/uploading materials, watering sites etc. All contracted workers will be required to sign and comply with the Code of Conduct (see **Annex 1**) prior to the commencement of work, which includes a provision to address the risk of GBV. The Code of Conduct governs both on-site behavior (with colleagues) and conduct in the community. Relevant training will be provided to workers, such as induction and daily toolbox talks outlining expected conduct and local community values; and training on GBV and GRM will be provided to communities located close to the construction works.

6.10 Vulnerable Groups

The employment of project workers and contractors will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, terms of employment (including wages and benefits), termination and access to training. To address the risk of exclusion of vulnerable groups (such as women and persons with disabilities) from employment opportunities, the Project will require the contractor to employ such groups as part of their unskilled workforce.

					ELMED Etudes SARL
Contractor Doc No: LM-01		Date 2023-04-12	Pag. 31 of 37		

Contractors will be also be required to comply with the Tunisian Labor Code on gender equality in the work place, which will include provision of maternity leave and nursing breaks and sufficient and suitable toilet and washing facilities, separate from men and women workers. Contractors will be also required to enable safety in the workplace to address potential sexual exploitation or harassment in recruitment or retention of skilled or unskilled female workers supported, and potential discrimination along ethnic lines under the project.

Contractors will also be required to adopt employment processes that ensure non-discrimination against "legitimate" foreign workers. This refers to foreign workers who, in accordance with Tunisian immigration and labor legislation, have the requisite status and can be lawfully employed.

6.11 Gender

Contractors will be fully responsible to ensure that their workers know and are trained on their obligations with respect to avoidance of any form of GBV and SEA/SH. Continuous motivation, monitoring and reporting on the same is the responsibility of the Contractor. The IA will have a monitoring team to ensure the same. Contractors are also required to ensure that the assigned workers are adequately trained and briefed with overall safety arrangement, use of equipment, GRM procedure, working conditions of the project. Training on GBV and SEA-SH and preparation and obtaining signed Code of Conduct are also Contractor's responsibility.

7. WORKER GRIEVANCE MECHANISM

7.1 Introduction

Workers (direct workers, contracted workers) have the right to submit grievances regarding workplace concerns without the threat of adverse employment action or prejudice. To facilitate the expression of complaints, and to meet the ESS2 requirement, a separate GRM from the general Project GRM will be established for project workers.

All direct project workers and contracted workers will be informed of their right to access the worker GRM, and contact details for the relevant focal point to whom grievances should be addressed in the first instance. STEG will work with the workers or their representatives to publicise the GRM and establish and maintain an effective worker GRM, through which workers can lodge complaints. This includes training to enable the Project to address grievances by workers, including workplace complaints in an efficient and effective manner to meet national regulations on labors and World Bank ESS2.

Grievance raised by workers will be recorded with the actions taken by each unit. The summary of grievance cases will be reported to the World Bank as part of regular project reporting. Where the aggrieved direct worker wishes to escalate their issue or raise their concerns anonymously and/or to a person other than their immediate supervisor/hiring unit, the worker may raise the issue with responsible municipal authorities, where relevant. Where the construction and supervision consultants have an existing grievance system, their direct workers should use such mechanism.

Contractors must set up their own GRM and inform their workforce about the GRM. The Contractors will prepare their LMPs before the start of civil works, which will also include a description of the worker GRM. The GRM must be well circulated and written in a language understood by all.

The site manager and the OHS officer (or other appropriate officers) of the contractor will hold a daily team meeting with all present contracted workers at site at the end of the daily work to discuss any workplace grievances. The grievance raised will be recorded with the actions taken by the contractor. The summary of grievance cases will be reported to the IA and the CSC as part of contractor's periodic report. Where appropriate and available, the contracted workers should be allowed to utilize an existing grievance mechanism within the contractor. Where the aggrieved workers wish to escalate their issue or raise their concerns anonymously and/or to a person other than their immediate supervisor, the workers may raise their issue with the IA and/or the CSC. The contracted workers will be informed of the grievance mechanism prior to the commencement of work. The contact information of the IA and/or the CSC will be shared with contracted workers.

7.2 Purpose of GRM

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

					ELMED Etudes SARL
Contractor Doc No: LM-01		Date 2023-04-12	Pag. 32 of 37		

- Ensure that grievances, complaints and concerns are addressed and resolved in a fair, transparent and easily accessible manner to achieve the goals of restoring positive relationships with project workers;
- Be responsive to the needs of project workers and to address and resolve their grievances;
- Serve as a conduit for soliciting inquiries, inviting suggestions, and increasing project workers participation;
- Collect information that can be used to improve operational performance;
- Promote transparency and accountability;
- Deter fraud and corruption and mitigate project risks;
- Facilitate timely feedback from project workers about STEG in order to support the project's commitment to continuous improvement.

As such the GRM fulfills the following functions:

- The GRM should serve as a focal point of communication across the organization where workers can report and receive advice on grievances, from which concerns and grievances are channelled to management.
- The mechanism should be mandated to identify remedies to be implemented through internal procedures in the form of corrective action, mediation, settlement or dispute resolution.
- The mechanism should have the capacity to direct complainants or hand over cases to appropriate external mechanisms, including state-based mechanisms, such as courts.

7.3 Grievance Register

A grievance register shall be opened and kept in the office of the LWC/OHS Risk Advisor. All grievances shall be registered when and upon the receipt of complaints from the aggrieved worker(s). The register shall have: i) a case reference number, ii) the aggrieved party's name, iii) the date the case is received, iv) the date the case is resolved and, v) a remarks column. The Register will be open to all project workers. The resident focal point in the project site shall register in the Grievance Register all written complaints received.

7.4 GRM Process

The GRM will provide a process to resolve grievances and disputes at the lowest level; resolve disputes relatively quickly before they escalate to an unmanageable level; help win the trust and confidence of project workers (direct and contracted workers), in the program and create a harmonious workplace; and help avoid project delays and cost increases and improve the quality of work.

The grievance handling process will be objective, prompt and responsive to the needs and concerns of the aggrieved workers. Different ways in which workers can submit their grievances should be allowed, such as submissions in person, by phone, text message, mail and email. Workers grievance and complaints boxes must be put in place at vantage places where workers can log their complaints anonymously. Individuals who submit their comments or grievances may request that their name be kept confidential. The mechanism will also be gender sensitive and ensure that grievances from female workers are handled separately and in a gender-appropriate manner.

While the timeframe for redress will depend on the nature of the grievance, OHS concerns in the work environment or any other urgent issues should be addressed immediately. Where the grievance cannot be addressed within a reasonable timeframe, the aggrieved worker should be informed in writing, so that the worker can consider seeking recourse through external mechanisms (e.g. via the Government Inspectorate of Labor or via the courts). Any worker filing a grievance must receive notice of the contractor/employer's finding regarding his or her particular complaint and whether corrective action will be taken.

Workers options for submitting a grievance include: (1) submission of the grievance to the regular duty officer in person or in writing; (2) via telephone (the Project will provide a dedicated number for this purpose) and hours during which the number will be active; and (3) a social media account where grievances may be submitted (this should be operated in a way that does not make grievances submitted visible to other users).

Note: Workers or labor association will submit their grievance to the GRM for workers through one of the following channels: Refer workers related complaints to the Workers GRM; registration, classification and analysis of grievances; convene the GRM for workers meeting to analyze and resolve the complaint; provide written response to the complainant/contractor; and provide guidance with recommendations to the contractor to improve working condition/labor management issues. This process is to be completed within 10 days.

			ELMED Etudes SARL
Contractor Doc No: LM-01	Date 2023-04-12	Pag. 33 of 37	

All grievances need to undergo review and investigation, depending on the type of grievance and clarity of circumstances. Once project workers are aware of the GRM and use it to address grievances, there is need of processing the grievances. Processing includes: (1) collecting grievances; (2) recording grievances as they come in; 3) registering them in a central place; and 4) tracking them throughout the processing cycle to reflect their status and importance. The following procedures will be followed while filing and processing complaints GRM structures:

- **Step 1 - Case Receipt:** The resident focal point in the project site shall register in the Grievance Register all written complaints received. Within 24 hours of receiving complaints, the monitoring consultant shall issue a letter to the aggrieved worker(s) acknowledging receipt of the case and providing a date when the case will be reviewed as well as the venue.
- **Step 2 - Case Registry:** On notification of a grievance, the duty officer will record the grievance in a standard format and copy the record to a central register which will be managed by the LWC/OHS Risk Management Advisor. The grievance officer will not share the worker GRM grievance register with any other person, except for the details required for investigation and resolution of the grievance. The Project Focal Point for the worker GRM will prepare summary data on grievances handled and outcomes for reporting purposes.
- **Step 3 - Meeting Complainant:** The second step in investigating any grievance, within seven days of notification of the grievance, will be for the worker GRM Focal Point who has received the complaint, together with the LWC/OHS Risk Management Advisor, to meet with the complainant. The complainant may bring a representative of his / her choice to this meeting. The meeting participants will jointly examine the complainant's terms and conditions of employment to determine whether the grievance is valid. The complainant will then decide whether he/she wishes to proceed to the next step.
- **Step 4 - Meeting with Employer:** The next step will be to notify the employer (the director of the relevant IA or contractor) of the grievance and invite the employer to participate in a meeting to review the grievance, to be held within 14 days after the initial notification of the grievance. The employer may choose to rectify the grievance at this stage. If the complainant notifies the Focal Point that the grievance has been rectified to his / her satisfaction, the meeting can be cancelled. The LWC/OHS Risk Management Advisor will be responsible to prepare for the meeting by carefully examining the grievance and the complainant's Terms and Conditions of employment and will give his/her opinion on the validity of the grievance. Where facts are in dispute, the meeting may choose to invite witnesses for questioning. At the end of the meeting the chair of the meeting will give his/her recommendation for resolution of the grievance.
- **Step 5 - Developing Resolution Options and Preparing a Response:** Once the grievance is understood, resolution options will be developed and a response will be prepared. If the recommendation of the IA is not accepted either by the employer or by the complainant, the grievance will be referred to the worker GRM Grievance Committee. The complainant will be invited to put their complaint directly to the committee and the costs of doing so (e.g. travel costs) will be paid by the project. The grievance committee will then decide what further action is needed. The decision of the Worker GRM Committee will be regarded as mandatory for internal project purposes; i.e. the employer of the complainant will be obliged to comply. If the employer is a contractor, compliance will become a condition for release of further payments under the contract. The worker GRM does not in any way limit the right of the project worker to seek recourse through other channels including the courts. *Note: Mediation meetings and outcomes will be recorded and kept by the GRM person-in-charge.*
- **Step 6 - Monitoring, Reporting and Evaluating the GRM:** Monitoring and reporting can be tools for measuring the effectiveness of the grievance mechanism and the efficient use of resources, and for determining broad trends and recurring problems so they can be resolved proactively before they become points of contention. Monitoring and reporting also create a base level of information that can be used to report back to STEG Management.
- **Step 7 - Closure of Grievance Procedure:** At the conclusion of the grievance procedure, a letter will be issued by the chair of the relevant grievance committee informing the complainant that the procedure is closed and recording the result. Except in the case that the grievance procedure is concluded (at the decision of the complainant) before notifying the employer, the letter will be copied to the employer. The result of the grievance procedure will be recorded in summary form in the worker GRM register. All documents related to the grievance procedure will be retained in a confidential file by the worker GRM focal point until the grievance procedure is completed. After that the file will be passed to the national WGRM focal point for safekeeping.

					
Contractor Doc No: LM-01	Date 2023-04-12	Pag. 34 of 37			

Note: No sanctions or retaliation of any kind are to be applied to a complainant as a consequence of having raised a complaint. Sanctions or retaliation by a contractor against a contracted worker who raises a grievance, or undue pressure to withdraw the grievance, constitute breach of contract.

7.5 GBV and SEA/SH Grievances

GBV and SEA/SH-related grievances will not be documented in the public accessible register. However, a GBV action plan will be prepared to manage related risks. To avoid the risk of stigmatization, exacerbation of the mental/psychological harm and potential reprisal, the GRM shall have a different and sensitive approach to GBV and SEA/SH-related cases. Where such a case is reported to the GRM, it should immediately be referred to the appropriate service providers, such as medical and psychological support, emergency accommodation, and any other necessary services. It should also be reported to the safeguard staff of the IA who can advise on relevant service providers. Data on GBV cases should not be collected through the GRM unless operators have been trained on the empathetic, non-judgmental and confidential collection of these complaints. Only the nature of the complaint (what the complainant says in her/his own words) and additional demographic data, such as age and gender, can be collected as usual.

7.6 Worker Feedback System

The worker feedback system will be established that logs all grievances, issues and concerns raised by workers during engagement sessions. The system will also record information on measures to address issues, timeframes, personnel responsible and any subsequent feedback that is required.

					ELMED Etudes SARL
Contractor Doc No: LM-01		Date 2023-04-12	Pag. 35 of 37		

8. CONTRACTOR SELECTION AND MANAGEMENT

8.1 Contractor Selection

STEG will make reasonable efforts to ascertain that the contractor who will engage contracted workers is legitimate and reliable entities and able to comply with the relevant requirements under the LMP. Such requirements shall be included in the bidding documents.

STEG will incorporate the agreed LWC/OHS standards 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 monthly payment to the contractor in case of non-compliance with relevant LWC/OHS requirements; removal of personnel from the works; or lack in the OHS performance security). In the case of subcontracting, the IA will require the contractor to include equivalent requirements and non-compliance remedies in their contractual agreements with subcontractors.

STEG, after receiving bids from the contractors, will ensure that the contractors are legitimate and have permits according to Tunisian law, and the necessary professional bodies. This LMP form an integral part of the bidding documents to be issued to consultant/contractors and shall form part of the awarded contracts to all contractors under the applicable contracting procedures. In addition, training and orientation will be given by STEG, with the support of the World Bank Social safeguards specialists, on different stages of awarding contracts and implementation to contractors, to ensure full understanding and compliance. As part of the process to select the contractors who will engage contracted workers, the IA may review the following information:

- Information in public records, for example, corporate registers and public documents relating to violations of applicable labor law, including reports from labor inspectorates and other enforcement bodies;
- Business licenses, registrations, permits, and approvals;
- Documentation relating to labor management, including OHS issues, such as labor management procedures;
- Identification of labor management, OHS personnel, their qualifications and certifications;
- Workers' certifications/permits/training to perform required work;
- Records of safety and health violations and responses; recordable incidents and corresponding Root Cause Analysis (e.g. lost time incidents), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, etc.);
- Accident and fatality records and notifications to authorities;
- Records of legally required worker benefits and proof of workers' enrollment in the related programs;
- Worker payroll records, including hours worked and pay received;
- Identification of safety committee members and records of meetings; and
- Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms reflecting/ materially consistent with ESS2.

The contracts with selected Contractor will include provisions related to LWC/OHS, as provided in the World Bank Standard Procurement Document and the Tunisian Labor Code. The bid document will make it mandatory for the contractors to annex a Contractor's ESMP, which will include work program, Code of Conduct, Traffic Management Plan, LMP, Labor Influx Management Plans, among others.

8.2 Performance Monitoring

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

Contractors must also monitor for and provide records of:

- Workers engaged under the Project, including contracts registry of induction/training of workers including Code of Conduct, hours worked, remuneration and deductions (including overtime), collective bargaining agreements;
- Recordable incidents and corresponding Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and remedial and preventive activities required (for example, revised job safety analysis, new or different equipment, skills training, and so forth);

- Number of workers, indication of origin (expatriate, local, nonlocal nationals), gender, age with evidence that no child Labor is involved, and skill level (unskilled, skilled, supervisory, professional, management);
- Training/induction dates, number of trainees, and topics;
- Details of security risks the contractor may be exposed to while performing its work- the threats may come from third parties external to the project;
- Details of worker grievances including occurrence date, grievance, and date submitted; actions taken and dates; resolution (if any) and date; and follow-up yet to be taken—grievances listed should include those received since the preceding report and those that were unresolved at the time of that report.

To this end, the IA will establish resources and procedures for managing and monitoring the performance of the contractor in relation to the LMP. The IA will ensure that the contract with the construction and supervision consultants explicitly set out their monitoring responsibility for the contractor's performance on LWC/OHS on a daily basis. Monitoring may include inspections, and/or spot checks of project locations or work sites and/or of labor management records and reports compiled by the contractor. Contractors' LWC 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 Tunisian Labor Code and the provisions of the LMP; and
- Records of training provided for contracted workers to explain OHS risks and preventive measures.

8.3 Supply Chain Management

STEG will also prepare a **Supply Chain Management Plan**, which will include the following:

- All primary (Tier 1) suppliers will be required to be pre-qualified before any contract is placed. The process to become a pre-qualified supplier will include an assessment of the supplier's existing controls and monitoring activities on their own internal (Tier 2) supply chain and the risk of labour violations to be occurring.
- A register of all Project suppliers will be maintained so that a central record is available of the companies involved, and the types of goods or services that they are providing.
- STEG will identify potential sources of risk within its Tier 1 and Tier 2 supply chain and conduct a screening to identify potential sources of risk based upon the general profile of the supplier and the type of goods and materials to be contracted. Using the results of the screening assessment, additional actions (such as audits, review of supplier's audit and inspection records, etc.) may be undertaken to check the adequacy of existing controls and monitoring activities.
- STEG's Environmental and Social Management System will include details of the minimum specifications of LWC/OHS and worker recruitment, including controls to avoid forced and child labour, sexual harassment and gender-based violence. The contracts between STEG and all suppliers will include legally binding obligations for them to undertake their contracted scope in accordance with the LMP. This is important, as if a legally binding obligation is not present, then it can be difficult to persuade suppliers to improve their worker conditions as they then only have an obligation to comply with national legislation.
- STEG will take all necessary precautions and make proactive and thorough investigations to ensure the origin and sourcing of equipment, components, materials and other supplies used for the construction of the OHL and related Project components so that they are not manufactured and supplied by firms (or subcontractors) that do not comply with the policies and standards of the donors (World Bank) that categorically prohibit and ban (i) the abusive employment of children or vulnerable persons and (ii) the practice of forced labor, human trafficking and slavery.

					
Contractor Doc No: LM-01		Date 2023-04-12	Pag. 37 of 37		

9. MONITORING, EVALUATION AND REPORTING

9.1 Monitoring and Evaluation

STEG will manage and carry out ongoing monitoring of the implementation of LMP by all categories of project workers during the construction phase. This will include inspections and periodic audits to ensure compliance with and effective implementation of the LWC and OHS provisions of the LMP. STEG will also manage and monitor the performance of contractors in relation to contracted workers, focusing on compliance by contractors with their contractual agreements and contractor LMPs. This will include periodic audits, inspections, and/or spot checks of project locations as well as of labour management records and reports compiled by contractors.

9.2 Reporting

STEG will carry out regular reporting on the LWC/OHS performance onsite, in addition to reporting of any accidents, incidents and/or emergencies and the measures undertaken in such cases to control the situation and prevent it from occurring again. Reporting of LWC/OHS issues and outcomes will be provided inter alia in a dedicated section of the periodic and annual project reports.

Reporting will include the following parameters:

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

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

9.3 Record Keeping

Record keeping will be an integral part of the LWC/OHS monitoring process, in keeping with the provisions of Tunisian labor legislation, ESS2 and the requirements of the World Bank's General EHS Guidelines.

9.4 Capacity Building

In the event that the provisions of the LMP exceed actual practice in labor management in Tunisia, particularly in the Tunisian power sector, the Project will develop and deliver training sessions to project staff and prepare simple awareness raising materials. Capacity building and awareness activities are covered under the proposed budget in the umbrella instrument, ESMF.

STEG will develop and deliver a short training courses for contractors and / or contractors site managers, explaining the obligations of the contractor as set out in the ESMP and LMP. Attendance at this course is to be a pre-condition for bidding for STEG works contracts. Supervising engineers are also to attend these courses.

9.5 Consultation

Consultation with stakeholders on STEG ESMP instruments including this LMP will be undertaken prior to appraisal – after the documents have been publicly disclosed in late January 2023. Disclosure and consultations will need to be planned to take place with interested and affected stakeholder. In view of government measures to avoid the spread of COVID-19 to transfer face-to-face consultations to virtual consultations to the extent possible and appropriate.