Labor Management Procedure (LMP)

Bay Terminal Marine Infrastructure Development Project (BTMIDP)

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List of Abbreviation

BADC	Bangladesh Agricultural Development Corporation
BoQ	Bill of Quantities
CoC	Code of Conduct
CHS	Community Health and Safety
EHS	Environment, Health and Safety
ESMP	Environmental and Social Management Plan
ESSs	Environment and Social Standards
GBV	Gender Based Violence
GoB	Government of Bangladesh
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HD	Human Development
ILO	International Labor Organization
LMP	Labor Management Procedure
LGED	Local Government and Engineering Department
MoF	Ministry of Finance
NGO	Non-Government Organization
NID	National Identification Card
OHS	Occupational Health and Safety
OHSP	Occupational Health and Safety Plan For consistency, this LMP uses the term “OHS Plan” to refer to site-specific occupational health and safety plans, including any contractor OHSP prepared under national requirements, ESS2, and the World Bank Group EHS Guidelines.
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
SDF	Social Development Foundation
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
WB	World Bank
WHO	World Health Organization

Executive Summary

This Labor Management Procedure (LMP) has been prepared for the Bangladesh Bay Terminal Marine Infrastructure Development Project in accordance with the World Bank Environmental and Social Framework, particularly Environmental and Social Standard 2 on Labor and Working Conditions, and relevant requirements of the Bangladesh Labor Act 2006, Bangladesh Labor Rules 2015, and applicable national legal and institutional provisions for port, marine, construction, occupational health and safety, and worker accommodation. The LMP provides a project-specific framework for managing labor and working conditions across the project lifecycle, including marine civil works, capital dredging, offshore breakwater construction, contractor and subcontractor labor, primary supply chains, worker accommodation, labor influx, SEA/SH prevention, and climate-related worker safety risks.

The LMP applies to all categories of project workers, including direct workers engaged by the Project Implementation Units, consultants, contracted and subcontracted workers, labor supplied through intermediaries or labor suppliers, migrant and foreign specialist workers, and primary supply workers providing core materials and equipment. During peak construction, the project is expected to require approximately 1500-2500 workers, with additional direct and indirect labor demand during operations for terminal operations, port services, logistics, equipment operation, maintenance, security, stevedoring, vessel traffic services, environmental and social management, and OHS functions.

Key labor risks relate to large-scale marine and port infrastructure works, including work over and near water, underwater works, diving and decompression risks, drowning, dredging, vessel movements, heavy lifting, cranes and marine equipment, confined spaces, hazardous materials, shift work and fatigue, noise and vibration, extreme weather, heat stress, cyclones, tidal surges, lightning, communicable disease transmission, worker-community interaction, labor influx, informal recruitment, wage non-payment, recruitment fees, child labor, forced labor, and SEA/SH. The LMP also recognizes the likely need for specialized domestic migrant workers and selected foreign specialists given the limited national availability of some marine construction and port-operation skills.

Labor influx is expected to be substantial during peak construction and is treated as a central risk area. The LMP requires early labor influx screening, local hiring and targeted training where feasible, transparent recruitment, prohibition of hiring “at the gate,” public communication on employment opportunities, and preparation of a site-specific Labor Influx Management Plan where risks are substantial. The plan must address pressures on public services, housing, transport, traffic safety, community cohesion, communicable disease transmission, child labor linked to services for workers, SEA/SH, substance abuse, illegal behavior, and unmanaged arrival of job seekers or service providers.

Worker accommodation requirements have been strengthened in line with World Bank Group requirements. Before accommodation is used, the PIU, supervision consultant, and contractors must assess whether it is needed, whether local workers can be hired or trained, whether local housing can safely absorb non-local workers, and whether on-site or community-based accommodation is more appropriate. Where accommodation is provided, contractors must prepare a Workers’ Camp Management Plan covering siting, construction, water, sanitation, waste, food safety, medical care, recreation, communication, security, worker rights, grievances, community relations, and closure or handover. Accommodation must meet minimum standards for space, separate beds, gender-separated facilities, potable water, sanitation, safe transport, lighting, ventilation, pest control, and rights-respecting security.

Occupational Health and Safety is a core requirement. Contractors must prepare and implement site-specific OHS Plans consistent with national legislation, World Bank Group EHS Guidelines, ESS2, ESS4, and good international industry practice. These plans must address dredging, underwater works, diving, lifting operations, equipment

maintenance, PPE, fire safety, emergency preparedness, rescue arrangements, traffic management, incident reporting, worker training, toolbox talks, and worker health services. Contractors must also adopt climate-responsive OHS procedures covering heat stress monitoring, work-rest cycles, shaded rest areas, drinking water and electrolytes, cyclone and tidal surge preparedness, lightning protocols, evacuation routes, emergency communications, and safe suspension and restart of marine works during severe weather.

The LMP strengthens SEA/SH prevention and response measures. Given the scale of civil works and labor influx, the project's SEA/SH risk is rated substantial. All workers must sign and follow a Code of Conduct, and contractors must provide induction and refresher training on acceptable behavior, SEA/SH prevention, confidentiality, referral pathways, and sanctions. These measures apply to work sites, worker accommodation, transport, port-adjacent communities, and service-provider interactions, with confidential reporting and survivor-centered referrals maintained through the worker GRM and SEA/SH action arrangements.

The LMP confirms that no worker under 18 years of age may be employed or engaged. Contractors must verify age through legally recognized documents, maintain recruitment records, and ensure that labor suppliers and subcontractors apply the same procedures. If an underage worker is identified, the contractor must remove the worker from project activities, notify the PIU, ensure the worker is not penalized, facilitate appropriate referral or remediation, review recruitment procedures, and apply sanctions to responsible suppliers or subcontractors. The LMP also prohibits forced labor, worker-paid recruitment fees, identity document retention, wage withholding, and recruitment practices that could create coercion or debt bondage.

Minimum labor standards include fair treatment, non-discrimination, equal opportunity, written employment particulars, timely wage payment, regulated working hours and overtime, rest periods, leave, freedom of association, and access to worker grievance mechanisms. Contractors must provide written employment terms before deployment; maintain records on working hours, overtime, payroll, deductions, training, grievances, disciplinary actions, incidents, accommodation inspections, and demobilization; disclose labor suppliers and intermediaries; and ensure all subcontractors and labor suppliers comply with the LMP, ESS2, national law, the Code of Conduct, OHS requirements, SEA/SH provisions, and worker GRM requirements.

The worker grievance mechanism covers direct, contracted, subcontracted, migrant, and primary supply workers. It must be accessible, confidential, non-retaliatory, and communicated in languages and formats workers understand. Contractors must report grievance statistics monthly to the PIU, including number and type of grievances, resolution time, unresolved cases, retaliation allegations, accommodation-related complaints, SEA/SH referrals handled confidentially, and corrective actions. SEA/SH-related complaints will follow separate survivor-centered procedures.

The PIUs are responsible for overall implementation of the LMP and for ensuring contractor, subcontractor, labor supplier, and primary supplier compliance. The PIUs will designate qualified environmental, social, labor, OHS, and SEA/SH focal points, while contractors must appoint qualified labor, OHS, community liaison, camp management, and SEA/SH focal points before mobilization. The PIUs will coordinate with relevant institutions, including Chittagong Port Authority, DIFE, Ministry of Labour and Employment, Department of Environment, Coast Guard, Navy, Fire Service and Civil Defence, local government, law enforcement, and emergency response agencies, with coordination arrangements reflected in contractor plans and tested through drills where relevant.

Mandatory inclusion of the LMP in bidding and contract documents as well as Project Operations Manual. The LMP shall form part of all relevant bidding documents, technical specifications, Bills of Quantities where applicable, and signed contract documents as well as the Project Operations Manual Compliance with the LMP. Contractors shall be responsible for ensuring that all subcontractors and labor suppliers receive, understand, and implement the

LMP requirements, and these obligations shall be reflected in all subcontracts and labor-supply agreements. The responsibility to ensure LMP implementation is with PIU / Chittagong Port Authority (CPA).

Contractor management provisions require labor and social risk mitigation measures to be incorporated into bidding documents, contracts, Bills of Quantities, technical specifications, and contractor plans. Contractors may not commence relevant civil works until the site-specific C-ESMP, Labor Influx Management Plan, Workers' Camp Management Plan where applicable, OHS Plan, Traffic Management Plan, SEA/SH Action Plan, Code of Conduct, worker GRM, and community liaison arrangements have been reviewed and approved by the PIU and supervision consultant. Contracts will include remedies for non-compliance, including corrective action notices, withholding of payments, removal of personnel, use of performance securities where applicable, suspension of activities, or contract termination for serious or repeated non-compliance.

Monitoring and reporting requirements are designed to support effective implementation. PIUs and supervision consultants will monitor contractor and subcontractor performance through inspections, document reviews, worker interviews, camp inspections, OHS audits, incident investigations, community consultations, GRM review, and corrective action tracking. Contractors must submit monthly labor and OHS reports covering workforce numbers and categories, recruitment, worker influx and demobilization, subcontractors, training, grievances, SEA/SH training and Code of Conduct signing, incidents and near misses, LTIFR, TRIR, PPE compliance, toolbox talks, wage payment status, accommodation conditions, recruitment channels, public service pressures, traffic incidents, and corrective actions. For substantial or high labor influx risk, independent or third-party monitoring may be used, and results will inform adaptive management.

1. INTRODUCTION

This Labor Management Procedure has been developed to reflect the specific context of the Bangladesh Bay Terminal Marine Infrastructure Development Project, including marine construction, dredging, breakwater works, contractor and subcontractor labor, primary supply chains, worker accommodation, climate-related occupational health and safety risks, and Bangladesh's applicable legal and institutional framework.

This Labor Management Procedure (LMP) is prepared for the Bay Terminal Marine Infrastructure Development Project (P176812) being implemented by Chittagong Port Authority, Chattogram, Bangladesh following the requirements of Environmental and Social Standards (ESSs) for Labor and Working Conditions (ESS2) of the World Bank Environmental and Social Framework (ESF), Bangladesh Labor Act, 2006) and Bangladesh Labor Rules 2015 (Including all amendments, revisions, updates and modifications issued or approved from time to time throughout the implementation period, up to and including the date of completion of the Project). Where national laws and ESS2 differ the higher standard will apply. This LMP includes an assessment of risks and impacts and required mitigation measures to ensure the health and safety of the contractor's workers that may be exposed to health risks. The LMP will be applied to all types of workers that will be employed by the project. Adhering to these procedures, contractors will be required to prepare Labor Management Plans which include provisions for OHS, and SEA/SH management etc. for the project workers. However small work contracts can be performed following this LMP as part of the bidding documents. Issues such as child labor, forced labor, SEA/SH issues, occupational health and safety are also addressed through the bidding and contract documents.

1.2 Objective of LMP

The objective of this LMP is to ensure appropriate worker management procedures and enhance the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions for

project sustainability. During the construction activities, contractors will follow this LMP to prepare an appropriate labor management plan and Code of Conduct (CoC) prior to the commencement of works, and as part of the pre mobilization documentation. The objectives of this LMP are to lay out clear guidance for:

- Ensuring the occupational health and safety of all project workers and contractors,
- Ensuring the fair treatment, non-discrimination and equal opportunity for all project workers, including vulnerable workers such as women, persons with disabilities, migrant workers, contracted workers, primary supply workers, and community workers as appropriate
- Prevention of Sexual Exploitation and Abuse/Sexual Harassment
- Prevention 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
- To provide project workers with an accessible means to raise workplace concerns.

1.3 Project Activities and Description

The overarching objective of the overall Bay Terminal is to increase global trade competitiveness and reduce the cost of imports and exports in Bangladesh. The Project Development Objective (PDO) is to enable the mobilization of private investment for the primary gateway port of Bangladesh and increase its operation efficiency.

Component 1: Support Port Marine Civil Infrastructure, Equipment, and Navigation System Development focuses on marine infrastructure, including the construction of a climate-resilient breakwater, capital dredging to deepen port access, and upgrades to navigation systems. These investments are designed to stabilize the port's offshore sandbar, improve vessel safety, and ensure resilience against climate risks. Sedimentation monitoring will inform future dredging strategies.

Subcomponent 1(a) supports the design and construction of an approximately 6.17 km long climate-resilient offshore breakwater located on an existing sandbar approximately 1.4 km offshore. The breakwater will be implemented through a Design-and-Build contract, under which the Contractor will be responsible for completing the detailed engineering design, construction methodology, temporary works, construction, testing, commissioning and completion of the breakwater in accordance with the Employer's Requirements, applicable international standards and approved environmental and social requirements.

The design shall provide for the stabilization and protection of the existing offshore sandbar and the safe and durable support of the breakwater structure, taking into account site-specific geotechnical, geophysical, hydrodynamic, wave, current, sediment transport and morphological conditions. The Contractor shall undertake all necessary investigations and analyses and shall design appropriate foundation and sandbar stabilization measures, scour and toe protection, structural protection and other ancillary measures required to ensure the long-term stability, serviceability and resilience of the breakwater.

Capital dredging supported by Subcomponent 1(b) will deepen the depth alongside the berth to 15.5 m and the entrance channel to 15 m relative to chart datum (CD). The existing depth alongside the berth varies around 8–9 m CD, and the capital dredging depth in the basin is expected to be 6–7 m below the existing depth with an expected volume close to 30 million m3. The capital dredging will be around 5,000 m long and 650 m wide, and the entrance channel is around 1.6 km long and 500 m wide. The seabed at the entrance channel is naturally deep as it extends into the anchorage area and will require less dredging. While maintenance dredging is not covered by IDA financing, initial support may be provided for sedimentation monitoring to gather essential data for developing a sustainable dredging strategy. Under Subcomponent 1(c), navigational aids will be installed along the access route to enhance

vessel safety, complemented by necessary updates to the existing VTMS at the Bay Terminal, which may include disaster risk management and emergency response capabilities.

Component 2: Support Port Efficiency Improvements and Capacity Development targets operational efficiency and workforce development. It supports the recruitment of specialized consultants, the establishment of a Center of Excellence for training, and technical assistance for logistics and climate adaptation. This component also includes initiatives to promote gender inclusion, such as training programs for women in logistics and environmental management.

Subcomponent 2(a) will support the strengthening of the PIU by hiring consultants for the engineering, procurement, E&S management, financial administration, governance, and harbor and marine functions during implementation. Subcomponent 2(b) will support the development of a training center to provide vocational and apprenticeship training. It will also provide technical assistance to support preparing a plan to establish a COE to train CPA's workforce on port operations, management, public-private partnerships (PPPs), sustainability, and climate change. Subcomponent 2(b) will further include the rehabilitation of an existing facility, supply of equipment, and staffing. Technical assistance and advisory support are included under Subcomponent 2(c) to support the development of competitive hinterland connectivity and logistics, linking the Bay Terminal to the initiative to transform Dhaka, landlord port management, and aspects related to the greening of ports and E&S management, as well as surveys for baseline and end line impact evaluations. Subcomponent 2(d) will support gender-focused activities under the Project to provide training to women in areas such as entrepreneurship in logistics service and trade management and E&S management activities as described in the Environmental and Social Management Plan (ESMP).

Component 3: Contingency Emergency Response will provide support for an immediate response to an eligible crisis or emergency, as needed.

2. OVERVIEW OF LABOR USE ON THE PROJECT

For this project, the provisions related to direct workers, contracted workers, and primary supply workers are relevant. Due to the nature of project, it is expected that there will be a high concentration of labours at the same place and at the same time. Also, labour influx is expected in the project's context.

The LMP applies to all types of workers engaged by the project including but not limited to full-time, part-time, and temporary workers. This LMP is also applicable for the direct project staff including project officials and PIU team. The LMP is applicable to:

- ✓ People employed or engaged directly by to work specifically in relation to the different components of the project;
- ✓ People employed or engaged by contractor, sub-contractors & consultant to perform work related to the core function of the project, regardless of location;

Direct Workers[1]: Direct workers will be engaged by this project; they include all workers directly contracted such as consultants hired for the PIUs to carry out design and supervision, monitoring and evaluation, FM, Procurement duties etc. in relation to the project. Government officials assigned to the Project will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement. The consultants will be engaged by the component/s to undertake short period assignments as required by the project. The contractual relationship of these consultants will be governed by specific agreements signed between the parties and PIUs.

Contracted Workers[2]: Based on the requirement in every component and sub-component, the PIUs will employ contractors who will hire contracted workers based on their level of skills and project needs. A contracted worker is a worker employed or engaged by a third party to perform work or provide services related to the core functions of the project, where the third-party exercises control over the work, working conditions, and treatment of the project worker. The employment relationship is between the third party and the project worker, even if the project worker is working on an ongoing basis on project activities. Sub-Contracts of the work could be given by the contractors. Subcontractors, thus engaged, may supply laborers as per the agreed terms and conditions stipulated in this LMP. Contracted workers are eligible to work for a period fixed by the contractor. Their contracts will be renewed, if required, based on satisfactory services.

Primary Supply Workers[3]: These workers are employed or engaged by a primary supplier (providing goods or materials directly to the project for its core functions on an ongoing basis), over whom a primary supplier exercises control for the work, working conditions, and treatment of the person. ESS2 does not apply to workers of Tier 2 and Tier 3 suppliers. are not covered by ESS2. See also ESS1 for discussion of what constitutes a primary supplier. PIUs will ensure (through periodical monitoring) that primary suppliers of the project do not involve child labor, forced labor or serious safety concerns to workers. PIUs will also ensure, before their involvement with the project, that

[1] A "direct worker" is a worker with whom the Program has a directly contracted employment relationship and specific control over the work, working conditions, and treatment of the project worker. Where government civil servants are working in connection with the project, whether full-time or part-time, 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.

[2]A "contracted worker" is a worker employed or engaged by a third party to perform work or provide services related to the core functions of the project, where the third-party exercises control over the work, working conditions, and treatment of the project worker.

[3]A "primary supply worker" is a worker employed or engaged by a primary supplier, providing goods and materials to the project, over whom a primary supplier exercises control for the work, working conditions, and treatment of the person.

supplies for the project are purchased from suppliers who have a track record of adhering to these labor principles and that they do not have any past incidents or allegations of violations related to child/forced labor or worker safety. The bid/procurement documents of the project will specify the related labor requirement for the primary supply workers and if any deviation is identified, PIUs will take action as prescribed in the Contract Agreements to remedy or replace them with more suitable suppliers

Estimated number and categories of project workers. During peak construction, the project is expected to require approximately 1500-2500 workers, including direct workers engaged by the PIU, engineering and supervision consultants, contracted workers engaged by civil works contractors and subcontractors, and primary supply workers providing core materials and equipment.

For similar types of work in each land port, estimated resources and Labor Requirement are below:
Estimated Resources and Labor Requirement for Bay Terminal Marine Infrastructure Development Project (BTMIDP):

Resource / Requirements	Construction Phase	Operation Phase
Energy	5,000 KVA (5 MVA)	15,000 KVA (15 MVA)
Water	150,000 liters/day	300,000 liters/day
Raw Materials & Equipment	Quantity to be determined based on the final Design-and-Build design, approved structural system and armour/protection requirements	To be confirmed based on final operational design and equipment requirements.
Labor Force	1500-2500 persons	10,000–12,000 persons

Characteristics of project workers. The workforce is expected to include local unskilled and semi-skilled workers from Chattogram and surrounding districts; national skilled workers from other parts of Bangladesh; and a limited number of specialized national and international workers with experience in dredging, breakwater construction, marine engineering, diving, tug and pilotage services, heavy lifting, vessel traffic management, equipment installation, Female workers may be engaged in administrative, logistics, environmental and social management, training, safety, laboratory. No person under 18 years of age will be engaged on the project.

Timing of labor requirements. Labor demand will be sequenced according to the construction schedule. Early mobilization will include survey, site preparation, camp establishment, traffic and marine safety arrangements, and mobilization of dredging and marine equipment. Peak labor demand is expected during breakwater construction, dredging, reclamation, equipment installation, and marine civil works.

Contracted workers and subcontracting structure. The project will rely heavily on contractors, subcontractors, specialized marine service providers, labor suppliers, and equipment providers. Contractors will be required to

disclose their subcontracting arrangements, labor-supply chains, worker numbers by skill category, recruitment channels, use of labor brokers or intermediaries, and locations of any worker accommodation. All subcontractors and labor suppliers must comply with this LMP, ESS2, applicable Bangladeshi law, the Code of Conduct, worker GRM requirements, OHS requirements, and SEA/SH prevention measures.

Migrant and foreign workers. Given the specialized nature of marine construction, dredging, diving, heavy marine equipment operation, and port navigation systems, the project may require domestic migrant workers and selected foreign specialists. Contractors must ensure lawful recruitment, work permits where required, transparent employment terms, prohibition of recruitment fees charged to workers, safe accommodation, access to grievance channels, translation of key labor information into languages understood by workers, and equal treatment regardless of nationality, place of origin, language, or employment channel.

Labor market assessment for specialized marine and port skills. Given the scale and specialized nature of the Bay Terminal works, the PIU as part of the submission requirements during the tender either for the supervision consultant or contractors, to undertake a concise labor market assessment for Bangladesh, with a particular focus on Chattogram and the national marine, dredging, port, and offshore construction labor market. The assessment shall identify the availability, qualifications, certification requirements, recruitment channels, wage conditions, training needs, and potential labor-supply gaps for specialized skill categories required by the project, including accredited commercial divers, dredging experts, engineers in the marine industry, tug operators or tuggers, operators of vessel traffic services, offshore crane operators, heavy lifting specialists, camp management personnel, OHS professionals, and emergency response staff.

The labor market assessment shall specifically determine whether sufficient qualified and accredited divers are available for underwater inspection, construction, welding, rescue, and emergency support; whether dredging experts with experience in capital dredging, hydrographic coordination, sediment management, and dredger operations are available; whether marine engineers with relevant port, breakwater, vessel, navigation, and marine infrastructure experience can be recruited; whether qualified tug operators or tuggers are available for vessel maneuvering, marine logistics, and emergency response; and whether operators of vessel traffic services have the required training, experience, communication skills, and familiarity with port navigation systems. The assessment shall also confirm if there is the anticipated shortage of offshore crane operators and identify mitigation measures to avoid deployment of inadequately qualified personnel for lifting operations in offshore, nearshore, or floating-platform conditions.

Where shortages are identified, contractors shall propose a labor sourcing and capacity-building plan that includes lawful national or international recruitment; verification of licenses, accreditation, certificates, logbooks, and prior experience; targeted training and refresher training before deployment; mentoring or shadowing arrangements for less-experienced workers; phased mobilization of scarce skill categories; language and communication support where foreign specialists are used; and defined minimum competency requirements for high-risk tasks. This labor market assessment and Plan will be part of the overall assessment for the bids. The costs to implement this plan should be incorporated into the offer and implemented throughout the project lifecycle. The plan shall also include controls to prevent unsafe hiring, wage inflation that could distort the local labor market, recruitment through unverified intermediaries, use of workers without valid certification, worker-paid recruitment fees, excessive overtime, fatigue, or substitution of qualified personnel after contract award.

Compliance verification for the labor market assessment. The PIU, with support from the supervision consultant, shall verify contractor compliance with the labor market assessment requirement through the following steps: (i)

confirm that the assessment is submitted as part of the bid and includes the required specialized skill categories; (ii) review the assessment methodology, data sources, consultations, recruitment channels, wage assumptions, certification requirements, and identified labor-supply gaps; (iii) require evidence of licenses, accreditation, competency certificates, logbooks, training records, and prior experience for specialized workers before deployment; (iv) confirm that any proposed use of foreign specialists or national migrant workers complies with applicable work authorization, recruitment, accommodation, language, and equal treatment requirements; (v) verify that bid prices and contract budgets include the cost of recruitment, training, certification verification, mobilization, refresher training, and supervision of scarce skill categories; (vi) include the approved labor sourcing and capacity-building measures in the contractor's Labor Management Plan, OHS Plan, C-ESMP, and method statements; (vii) check during mobilization that named key personnel and certified operators have not been substituted without prior approval; and (viii) record all findings in the contractor compliance checklist and corrective action tracker.

During implementation, verification shall be carried out through document review, site inspections, worker and supervisor interviews, payroll and roster checks, spot checks of certificates and identification documents, review of training and toolbox-talk records, and observation of high-risk tasks such as diving, dredging, tug operations, VTS operations, and offshore or nearshore lifting. Contractors shall report monthly on the status of specialized labor recruitment, vacancies, substitutions, training completed, certification validity, overtime and fatigue controls, incidents or near misses involving specialized workers, and any changes in the labor market that could affect safe implementation. Where gaps or non-compliance are identified, the PIU and supervision consultant shall require time-bound corrective actions before the relevant activity proceeds and may restrict deployment, suspend the relevant work activity, require replacement of unqualified personnel, or withhold payment until compliance is demonstrated.

Enforcement penalties for non-compliance. Failure to prepare, submit, update, or implement the labor market assessment and related labor sourcing and capacity-building plan shall constitute a contractual non-compliance event. Depending on the severity, recurrence, and risk to workers or project activities, the PIU and supervision consultant may apply graduated enforcement measures, including written non-compliance notices, mandatory time-bound corrective action plans, rejection of mobilization for affected work fronts, suspension of high-risk activities, non-approval or removal of unqualified personnel, mandatory replacement of subcontractors or labor suppliers, withholding of interim payments, disallowance of related costs, application of contractual penalties or liquidated damages where included in the contract, drawdown on performance security where applicable, and restriction on further deployment until compliance is verified. These remedies shall be reflected in bidding documents, contract conditions, Contract Agreement, Bills of Quantities where relevant, and contractor management procedures so that penalties are enforceable throughout the project lifecycle.

Labor influx screening and planning. Prior to contractor mobilization, the PIU and supervision consultant shall screen labor influx risks based on the expected number and origin of workers, the duration and sequencing of works, labor availability, skills gaps, accommodation needs, transport arrangements, community capacity to absorb incoming workers, existing public services, and potential cumulative impacts from other nearby port, logistics, or infrastructure activities. Where risks are substantial, contractors shall prepare a site-specific Labor Influx Management Plan and, where accommodation is provided, a Workers' Camp Management Plan as part of the C-ESMP before works commence.

Controls on informal recruitment and labor suppliers. To manage Bangladesh-specific risks associated with labor brokers, informal daily-wage hiring, substitution of identity, undocumented workers, and recruitment fees, contractors shall use only disclosed and legally compliant recruitment channels and labor suppliers. Contractors shall verify labor supplier licenses or registrations where applicable, maintain a worker register linked to legally recognized

identification documents, prohibit hiring at the gate, prohibit worker-paid recruitment fees, and maintain auditable records of contracts, attendance, wage payments, deductions, overtime, training, grievances, and demobilization. Where feasible and proportionate, contractors shall use digital attendance systems, electronic wage payment, and periodic PIU or supervision consultant verification of worker identity, payroll, and labor supplier compliance.

Measurable supervision indicators and labor KPIs. To support efficient supervision, the LMP shall require the PIU, supervision consultant, contractors, and subcontractors to monitor and report measurable labor and OHS indicators. These indicators shall be included in contractor monthly labor and OHS reports, the PIU Monitoring Matrix, corrective action tracker, and quarterly management reviews. Indicators shall be disaggregated where relevant by contractor, subcontractor, labor supplier, work site, worker category, gender, migrant or local status, accommodation status, and high-risk activity.

Indicator	Measurement / Definition	Source / Method	Reporting Frequency
Lost Time Injury Frequency Rate (LTIFR)	Number of lost time injuries per agreed standard exposure hours, calculated consistently across all contractors and subcontractors.	Incident logs, medical records, worker hours, investigation reports, contractor OHS reports.	Monthly contractor reporting; quarterly PIU review.
Total Recordable Incident Rate (TRIR)	Total recordable work-related injuries and illnesses per agreed standard exposure hours, including medical treatment, restricted work, lost time, and fatalities.	Incident and near-miss registers, first-aid and medical records, OHS reports, investigation records.	Monthly contractor reporting; quarterly PIU review.
Proportion of workers with formal contracts	Percentage of project workers with written employment particulars or contracts before deployment.	Employment contracts, digital worker register, biometric registration records, labor supplier records, worker interviews.	Before mobilization and monthly thereafter.
Proportion of workers receiving OHS induction	Percentage of workers completing project, site-specific, task-specific, SEA/SH, emergency response, and climate-responsive OHS induction before starting work.	Training attendance sheets, induction records, toolbox talk logs, worker interviews, access control records.	Before deployment and monthly update.
Grievance resolution time	Average and maximum number of days taken to acknowledge, assess, resolve, and close worker grievances, with SEA/SH cases handled through separate confidential survivor-centered procedures.	Worker GRM logs, grievance closure records, worker interviews, corrective action tracker.	Monthly reporting; immediate escalation of overdue or retaliation-related cases.
Timely payment of wages	Percentage of workers paid in full and on time within the legally required or contractual wage period, including overtime and benefits.	Payroll records, electronic payment confirmations, pay slips, attendance records, worker interviews, grievance logs.	Monthly payroll verification by contractor and supervision consultant; quarterly PIU audit.

Indicator	Measurement / Definition	Source / Method	Reporting Frequency
Frequency of labor inspections	Number and frequency of PIU, supervision consultant, independent, DIFE, and unannounced labor inspections completed against plan.	Inspection reports, audit reports, DIFE correspondence, site visit records, corrective action tracker.	Monthly tracking; quarterly PIU review.
Worker satisfaction / contentment	Worker feedback on employment terms, wage payment, accommodation, food, OHS, grievance access, supervisor conduct, representation, and freedom from retaliation.	Anonymous worker surveys, focus groups, worker interviews, labor-management meeting minutes, grievance trends.	At least semi-annually and during peak workforce periods.
Contractor labor and OHS compliance score	Composite score based on LMP implementation, OHS performance, wage compliance, contracts, training, GRM, accommodation, labor supplier management, corrective action closure, incidents, inspections, and repeated non-compliance.	PIU compliance checklist, supervision consultant reports, audit results, KPI dashboard, corrective action tracker, payment certificate reviews.	Monthly contractor scoring; quarterly PIU management review; linked to contractual remedies where performance is poor.

The LMP also strengthens provisions for primary supply workers. Primary suppliers of stone, boulders, sand, cement, steel, fuel, marine equipment, dredging support materials, and other critical inputs must be screened for child labor, forced labor, serious safety issues, wage non-payment, recruitment fees, unsafe conditions, and labor compliance risks. Contractors must maintain supplier registers and provide evidence of due diligence, including licenses, labor compliance records where available, OHS performance, and corrective action status. Where significant non-compliance is identified, the PIU may require corrective action, increased monitoring, suspension of procurement, or replacement of the supplier.

3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

3.1 Key Labor Risks

The main labor risks associated with the project relate to marine civil works, breakwater construction, capital dredging, underwater and near-water works, offshore and onshore heavy lifting, equipment installation, vessel movement, navigation safety, port operations, and labor accommodation. The possible risks include:

- The conduct of hazardous work, such as working at heights or in confined spaces, use of machinery, or use of hazardous materials
- Risk of engaging child labor
- Risk of SEA/SH
- Possible accidents or emergencies, with reference to the sector or locality
- Risk of infections and spread of disease among labor
- General understanding and implementation of occupational health and safety requirements

- Risk of transmitting communicable diseases among workers, nearby communities, and labor accommodation areas, particularly where large numbers of workers are concentrated near port and marine construction sites.
- Underwater works
- Port- and marine-specific labor risks, including stevedoring, dock labor, pilotage, tug operations, vessel traffic management, shift work, fatigue, hazardous cargo/material handling, confined spaces, diving and decompression risks, and emergency response in offshore and nearshore settings.

3.2 Labor Influx

Given the scale of the Bay Terminal works, labor influx is expected to be substantial during peak construction. The project will follow the mitigation hierarchy by first seeking to avoid and reduce labor influx through local recruitment where feasible, targeted training of local workers, transparent hiring procedures, and advance communication on realistic employment opportunities. While unskilled and semi-skilled workers should be hired locally to the extent feasible, specialized workers may be recruited nationally or internationally for dredging, marine engineering, diving, heavy equipment operation, breakwater construction, vessel traffic management, and port systems. Contractors will be responsible for safe and adequate accommodation, organized transport, worker induction, disease prevention, worker-community interaction management, and compliance with the Code of Conduct. Labor accommodation, if required, shall meet good international industry practice, including safe lodging, potable water, sanitation, drainage, waste management, food safety, fire safety, recreation, privacy, lighting, and separate, secure facilities for women workers. The below recommended standards are in line with the IFC Workers' Accommodation: Processes and Standards (2009)[4].

Workers' accommodation needs assessment. Before establishing or using any workers' accommodation, the PIU, supervision consultant, and contractors shall assess whether accommodation is required, whether workers can be recruited locally, whether local workers can be trained to meet project needs, and whether existing local housing can absorb non-local workers without adverse impacts. The assessment shall consider the local housing market, rental affordability, risks of crowding out local residents, pressure on utilities and public services, transport needs, and the potential advantages and disadvantages of on-site accommodation versus accommodation within host communities.

Accommodation requirements. All worker accommodation shall comply with Bangladeshi law, ESS2, ESS4, the IFC standards for worker accommodation and good international industry practice (including if these are arranged within the surrounding communities through agreements with private actors). Facilities shall be safely located away from flooding, tidal surge, fire risk, pollution, excessive noise, unsafe traffic, and other hazards; constructed with durable materials; maintained in good repair; regularly cleaned; adequately drained; and supported by safe transport to and from work sites where required. Accommodation shall provide safe, uncrowded, well-ventilated, well-lit, and secure living conditions, including adequate space, separate beds, clean bedding, privacy, secure storage, lockable rooms, mosquito protection where needed, and separate sleeping and sanitary facilities for men and women, except in family accommodation.

Water, sanitation, food, health, and welfare. Workers shall have continuous access to sufficient free potable water that meets national or WHO standards, supported by covered storage and regular water quality monitoring. Toilets,

[4] https://www.ifc.org/en/insights-reports/2000/publications-gpn-workersaccommodation

urinals, wash basins, showers, laundry areas, wastewater systems, and solid waste management shall be adequate for the workforce, gender-separated where required, private, lockable, clean, functional, well-lit, ventilated, and managed to avoid adverse impacts on workers, communities, or the environment. Where food is provided, kitchens, dining areas, food storage, preparation, and serving arrangements shall follow recognized food safety principles and provide adequate, safe, and, where feasible, culturally appropriate meals. First aid, trained first aiders, emergency communication, medical access, laundry, rest, recreation, communication, and religious observance facilities shall be provided where appropriate.

Camp management, worker rights, security, and closure. Each accommodation facility shall be governed by a Workers' Camp Management Plan covering staffing, cleaning, maintenance, health and safety, fire safety, emergency response, security, accommodation rules, worker consultation, grievance handling, community relations, and closure or handover. A qualified accommodation manager shall be appointed. Accommodation charges, if any, shall be transparent, reasonable, stated in employment documents, and shall not create indebtedness or substitute for wages. Workers' identity documents shall not be withheld. Freedom of movement, freedom of association, privacy, cultural and religious practices, non-discrimination, and access to confidential worker grievance channels shall be respected. Security arrangements shall be proportionate, rights-respecting, gender-sensitive, and accessible through worker and community grievance mechanisms. Closure arrangements shall be planned from the outset to avoid residual impacts and identify safe community use where appropriate.

Bangladesh-specific accommodation approvals and safeguards. Worker accommodation shall be subject to applicable local health, building, fire safety, labor, and environmental requirements. Before use and periodically during operation, contractors shall obtain or document required inspections, approvals, or certifications from relevant authorities where applicable, including examination by regional or local health authorities, Fire Service and Civil Defence certification, and environmental safeguards for wastewater, solid waste, drainage, and vector control consistent with Department of Environment requirements. Camp arrangements shall provide culturally appropriate food, prayer facilities, mosquito and vector control, safe drinking water, gender-sensitive accommodation, secure lighting, separate sanitation facilities, and accessible grievance channels for camp residents.

- **Health authority examination:** Worker accommodation, kitchens, dining areas, drinking water systems, sanitation facilities, first-aid rooms, wastewater systems, and communicable disease controls shall be examined by the relevant regional or local health authority where applicable before occupancy and periodically thereafter. Findings shall be recorded and corrective actions closed before full occupancy or within the timeframe agreed with the authority and PIU.
- **Fire Service certification:** Accommodation facilities shall obtain Fire Service and Civil Defence certification or documented clearance where required, including verification of fire detection, alarms, firefighting equipment, emergency exits, evacuation routes, assembly points, electrical safety, fuel and LPG storage controls, hot-work controls, drills, and staff training.
- **Gender-responsive accommodation:** Accommodation shall take gender into account through separate, safe, lockable, well-lit, and private sleeping, bathing, sanitation, laundry, changing, and rest facilities for women and men; safe access routes; appropriate security arrangements; confidential grievance access; and measures to address SEA/SH risks, including safe transport and supervision arrangements where relevant.
- **Culturally suitable food arrangements:** Food arrangements shall be safe, nutritious, hygienic, affordable or provided as agreed in employment terms, and suitable for the cultural, religious, and dietary needs of the workforce to the extent feasible. Kitchens and dining facilities shall be regularly inspected, food handlers trained, and food storage, preparation, and serving areas maintained in sanitary conditions.

- **Prayer and religious observance facilities:** Accommodation shall include adequate, clean, safe, and accessible space for prayer or religious observance, scheduled so that use of the facilities does not create discrimination, conflict, or interference with rest, privacy, safety, or work requirements.
- **Mosquito and vector control:** Contractors shall implement an integrated mosquito and vector control program covering drainage, removal of stagnant water, screened or protected sleeping areas, waste management, larval source control, safe use of approved pesticides where needed, health awareness, and coordination with health authorities where outbreaks or elevated vector-borne disease risks are identified.
- **Wastewater management in accordance with DoE requirements:** Wastewater from accommodation, kitchens, washing areas, toilets, showers, laundry, and medical or first-aid areas shall be collected, treated, reused or discharged only in accordance with Department of Environment requirements, project environmental permits, and the ESMP. Septic tanks, soak pits, packaged treatment units, grease traps, drainage channels, sludge removal, and wastewater discharge points shall be designed, operated, inspected, and maintained to prevent contamination of soil, groundwater, surface water, marine areas, worker accommodation, and surrounding communities.

The Labor Influx Management Plan shall include measures to manage potential community impacts such as pressure on water, electricity, sanitation, health care, transport, housing and rents; local price increases; traffic and road safety risks; communicable diseases; social conflict; substance abuse; illegal behavior; SEA/SH; child labor linked to services provided to workers; and the arrival of job seekers, traders, service providers, or other followers. The plan shall specify worker numbers by origin and skill category, accommodation arrangements, recruitment channels, transport routes, worker movement controls, camp rules, community liaison arrangements, communication activities, monitoring indicators, grievance channels, and procedures for adaptive management where unanticipated impacts arise.

3.3 Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)

The labor influx for the project is anticipated to be substantial during peak construction. The SEA/SH risk is assessed as 'Substantial' by using the World Bank's tool for major civil works and human development. The related risk of SEA/SH will be mitigated by implementing a Code of Conduct before employing any worker, ensuring induction and refresher training, establishing confidential reporting channels, mapping survivor-centered referral services, and monitoring contractor compliance. SEA/SH risk management will apply to work sites, labor camps, transport arrangements, port-adjacent communities, and interactions between workers and service providers. The overall SEA/SH risk mitigation measures include the following:

- Training and awareness raising for the workforce about refraining from unacceptable conduct toward women workers. Training must be repeated during the project implementation period
- Informing workers about national laws that make sexual harassment and gender-based violence a punishable offence which is prosecuted
- Adopting a policy to cooperate with law enforcement agencies in investigating complaints about gender-based violence
- Closely monitoring the works and activities of laborers, especially if in close proximity with female laborers
- Enforcement of a code of conduct for all workers; and
- Instituting a labor responsive GRM which will also capture workplace SEA/SH related complaints/issues and informing laborers on the complaint filing procedures

The contractors are to maintain labor relations through a designated code of conduct (CoC). The CoC commits and oblige all project workers, including those engaged by and through the contractor, sub-contractors and suppliers, to

acceptable standards of behavior. The CoC shall include sanctions for non-compliance, including non-compliance with specific policies related to gender-based violence, sexual exploitation and sexual harassment (including termination). The CoC shall be written in Bangla (and for the expatriate worker, it shall be in English) and in a reader-friendly manner and to be signed by each worker and employee to indicate that they have:

(a) received a copy of the CoC as part of respective contract
(b) had the CoC explained to them as part of induction process
(c) acknowledged that adherence to this CoC is a mandatory condition of employment
(d) understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities

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

To reduce adverse worker-community interactions, contractors and all their subcontractors shall provide supervised recreation and communication facilities where workers are accommodated (including if these are arranged within the surrounding communities through rental agreements with private actors), prohibit hiring "at the gate," avoid informal recruitment practices that attract unmanaged job seekers, provide clear public information on recruitment procedures and eligibility criteria, and coordinate with local authorities to prevent unsafe informal settlements or unregulated service areas from developing around work sites and camps.

3.4 Occupational Health and Safety

There are risks associated with projects with construction, excavation, rehabilitation activities and also the civil works. Several hazards can be encountered while drilling or working under the water surface. Besides, these, drowning, lack of clean and ventilated workspace and fire hazard are also associated risks during the project. The expected risks may lead to personal injury, traffic-related accidents, fall from height, poor working conditions, and lack of PPEs. PIUs must make arrangements for contractors training on health and safety, records of their compliance have to be inspected monthly and audited bi-annually. The key potential OHS risk associated at construction and operation stages are listed below-

Physical & Environmental Hazards

- **Falls and Drowning:** Working on barges, piers, and other structures over water creates a constant and high risk of falling from heights, which can lead to serious injury or drowning, especially if a worker is knocked unconscious upon impact or if rescue is difficult.
- **Water, Waves, and Weather:** Workers are exposed to unpredictable and rapidly changing conditions, including strong currents, wave action, and adverse weather (e.g., dense fog, high winds, extreme temperatures), which can destabilize work platforms and increase fall risks.
- **Slips, Trips, and Falls:** Wet, slippery surfaces on docks and work vessels (often due to water or oil spills) are common and a leading cause of injury in the marine construction industry.
- **Extreme Temperatures:** Construction often occurs outdoors in all weather conditions, leading to risks of heat stroke in hot weather and hypothermia in cold conditions.

Machinery and Equipment Risks

- **Struck-By or Caught-In/Between:** The use of heavy machinery, cranes, and vehicles (forklifts, trucks, etc.) in congested and dynamic environments poses significant risks of workers being struck by moving objects, falling loads, or getting caught in equipment.
- **Material Handling Accidents:** The lifting, carrying, and maneuvering of heavy or unstable loads (e.g., containers, steel piles) can lead to crush injuries, musculoskeletal disorders, and other physical trauma.

- **Equipment Malfunction:** Specialized marine equipment like dredges, cranes, and winches can malfunction, leading to accidents if not maintained properly.

Specialized & Health-Related Risks

- **Commercial Diving Hazards:** Underwater construction involves unique, life-threatening risks for divers, including decompression sickness ("the bends"), electrical shocks from underwater welding, hypothermia, and physical injury from underwater equipment. Divers engaged in underwater welding or structural work face a fatality rate nearly 40 times the national average. Critical risks include:

    - **Decompression Sickness:** "The bends" from surfacing too quickly.
    - **Underwater Explosions:** Accumulation of combustible gases during underwater steel welding.
    - **Physical Injury:** Operating heavy equipment in low-visibility, high-pressure environments.

- **Exposure to Chemicals and Contaminants:** Workers may be exposed to hazardous substances like asbestos, chemicals in building materials, fuel spills, or hydrogen sulfide gas in confined spaces.
- **Ergonomic Issues:** Strenuous manual labor, repetitive motions, and awkward postures contribute to long-term occupational diseases and chronic pain, such as joint pain and spine disorders.
- **Noise and Vibration:** High noise levels from construction activities and machinery can lead to hearing impairment and other health issues, while vibrations from power tools can cause long-term nerve damage.
- **Physical and Mental Fatigue:** The demanding nature of the work, which often operates around the clock, can lead to fatigue, increasing the likelihood of human error and accidents.
- **Lack of Skilled Labor:** A shortage of experienced workers means less-experienced staff may be performing high-risk tasks, which contributes to higher accident rates.

The risk will be mitigated by contractor provision of personal protective equipment (PPE), such as safety shoes, helmets, safety vests, masks, gloves, protective clothing, goggles, full-face eye shields, and ear protection based on work requirements. Workers shall maintain PPE properly by cleaning dirty items and replacing damaged items. The PIU will require contractors to prepare and implement an OHS Plan consistent with the World Bank Environment, Health and Safety Guidelines and applicable local legislation.

Labor influx-related community health and safety measures shall include dedicated health services for workers where feasible; screening, prevention, and treatment arrangements for communicable diseases; health awareness campaigns for workers and surrounding communities; safe water and wastewater systems in camps; separate service provision to avoid overloading community facilities; and coordination with local health and emergency service providers for industrial accidents, marine emergencies, and communicable disease risks.

Contractors shall also prepare a climate-responsive OHS procedure for marine and coastal works. This procedure shall include heat stress prevention, wet-bulb globe temperature or equivalent heat-risk monitoring, work-rest cycles, shaded rest areas, drinking water and electrolyte access, cyclone and tidal surge preparedness, lightning protocols, safe suspension and restart of marine works during severe weather, evacuation routes, emergency communications, rescue equipment, and coordination with port, coast guard, fire service, and local disaster management authorities.

Localized coastal and marine OHS thresholds. For works in Bay Terminal Marine Infrastructure Development Project (BTMIDP) in Chattogram, contractors shall define clear thresholds and decision-making authority for suspension, evacuation, and restart of works during cyclone warnings, tidal surge alerts, monsoon marine conditions, high winds, lightning, extreme heat, unsafe visibility, unsafe sea states, and emergency vessel movement restrictions. The OHS Plan shall identify responsible persons, communication channels, muster points, evacuation vessels or transport,

rescue equipment, medical referral arrangements, coordination with Chittagong Port Authority (CPA) and emergency authorities, and post-event inspection requirements before work resumes. These arrangements shall be consistent with the Institutional Coordination and Emergency Response Matrix in Section 5.

Climate-responsive OHS protocols . Contractor OHS Plans, emergency response plans, marine method statements, and work permit procedures shall include specific climate-responsive protocols, including cyclone warnings, tidal surge evacuation, monsoon marine operations, lightning protection, heat stress management, and defined thresholds for work suspension and restart during extreme weather. These protocols shall be approved before mobilization, communicated to all workers during induction and refresher training, tested through drills, and updated before each monsoon and cyclone season or after any major incident, near miss, or severe weather event.

- **Cyclone warning protocols:** Contractors shall maintain a cyclone preparedness procedure based on official warnings from competent authorities and CPA coordination requirements. The procedure shall define warning levels, persons authorized to suspend work, notification cascades, worker accounting procedures, securing of cranes, vessels, barges, dredgers, fuel stores, temporary works, scaffolds, lifting gear, electrical systems, and hazardous materials, safe demobilization of marine crews, evacuation timelines, emergency transport, communication backups, shelter or muster arrangements, and restart requirements after the warning is lifted.
- **Tidal surge evacuation:** Contractors shall prepare site- and camp-specific tidal surge and coastal flooding evacuation procedures for work sites, worker accommodation, marine platforms, vessels, dredgers, access roads, jetties, laydown areas, and temporary facilities. The procedures shall identify safe routes, high-ground locations, transport arrangements, muster points, accountability checks, night-shift procedures, emergency lighting, support for workers with disabilities or limited mobility, communication with CPA and local disaster management authorities, and requirements to suspend access to flooded or unstable areas until inspected and cleared.
- **Marine operations during monsoon:** Marine method statements shall define monsoon operating controls for dredging, tug operations, towing, vessel movement, lifting from floating platforms, diving, breakwater works, crew transfers, and work over or near water. Controls shall include daily weather and sea-state checks, safe wind, wave, current, tide, visibility, rainfall, and lightning thresholds, shift-level go/no-go decisions, vessel stability checks, safe anchoring and mooring, rescue boat readiness, communication with vessel traffic or harbor authorities, fatigue controls, and documented suspension and restart approvals.
- **Lightning protection:** Outdoor, elevated, marine, jetty, crane, lifting, dredging, diving support, electrical, fueling, and open-water activities shall be suspended during lightning alerts or observed lightning within the defined exclusion radius in the OHS Plan. Workers shall move to designated safe shelters or protected vessels, cranes and lifting operations shall be made safe, electrical work shall be isolated where required, and work shall not restart until the all-clear period and inspection requirements specified in the OHS Plan have been met.
- **Heat stress management:** Contractors shall implement heat stress controls using wet-bulb globe temperature or an equivalent heat-risk monitoring method, with defined work-rest cycles, shaded rest areas, cool drinking water, electrolyte access, acclimatization for new or returning workers, modified work schedules during high-heat periods, buddy systems, heat illness recognition training, first aid and medical referral arrangements, and additional controls for workers wearing heavy PPE, performing lifting, marine, confined-space, or night-shift work, or working in poorly ventilated areas.
- **Extreme-weather suspension and restart thresholds:** Contractor OHS Plans shall specify measurable thresholds and decision-making authority for suspension, evacuation, and restart of work during cyclones, tidal surges, high winds, unsafe sea states, heavy rainfall, poor visibility, lightning, extreme heat, flooding,

unstable ground or temporary works, navigation restrictions, or emergency vessel movement restrictions. High-risk activities shall not proceed when thresholds are exceeded. Restart shall require documented inspection of work fronts, vessels, lifting equipment, electrical systems, temporary works, access routes, accommodation, emergency equipment, and communication systems; confirmation that workers have been briefed; and written clearance by the contractor OHS lead with supervision consultant verification where required.

The PIU and supervision consultant shall verify implementation of these protocols through review of approved OHS Plans, emergency response plans, work permits, weather and sea-state logs, training and drill records, daily pre-start briefings, work suspension and restart records, inspection reports, incident and near-miss records, and worker interviews. Non-compliance with climate-responsive OHS protocols, including proceeding with work after suspension thresholds are exceeded or restarting work without required inspection and clearance, shall be treated as serious OHS non-compliance and may result in immediate suspension of the relevant activity, removal of responsible personnel, withholding of payments, or other contractual remedies.

3.5 Risk of Engaging Child Labor

Although the Bangladesh Labor Act 2006 permits limited forms of non-hazardous work for adolescents under specific conditions, this project adopts a stricter project standard: no person under 18 years of age shall be employed, engaged, or permitted to work in any project activity, whether by the PIU, contractors, subcontractors, labor suppliers, or primary suppliers. Contractors shall verify age before recruitment using legally recognized documents such as a National Identification Card, birth certificate, passport, or other acceptable official documentation. If a worker under 18 is identified, the contractor shall immediately remove the worker from project activities, notify the PIU, ensure that the worker is not penalized, facilitate appropriate referral or remediation, review recruitment controls, and apply sanctions to responsible subcontractors or labor suppliers where relevant.

3.6 Risk of Engaging Forced Labor

Forced employment of laborers, especially of local laborer's, is a serious offence and must be prohibited. Sudden and random inspection of the site and primary suppliers by the MoLGRD&C, MoWR and MoA need to be done on a regular basis to ensure compliance. Bid documents for contractors/sub-contractors and primary suppliers will include strict provisions against forced labor.

4. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

This section summarizes the key aspects of national labor legislation relevant to terms and conditions of employment and identifies project measures needed to meet ESS2 where national law, implementation practice, or institutional capacity does not fully address project-specific labor risks. It is agreed that where there are discrepancies, the more stringent standard should be applied.

Standards for Labor and Working Conditions are defined in Bangladesh Labor Act, 2006 (amendments in 2013 and 2018) and Bangladesh Labor Rules 2015 and Occupational Health and Safety Policies 2013. Bangladesh Labor Act, 2006 is a comprehensive legislation. The Act addresses three areas: (i) Conditions of service and employment including wages and payment, establishment of Wages Boards, employment of young people, maternity benefits, working hours and leave; (ii) health, safety, hygiene, and welfare, and compensation for injury; and (iii) trade unions and industrial relations. The health and safety issues relevant to COVID-19 should be addressed with reference to ILO Occupational Safety and Health Convention, 1981 (No. 155), ILO Occupational Health Services Convention, 1985 (No. 161), ILO Safety and Health in Construction Convention, 1988 (No. 167), WHO International Health Regulations, 2005, WHO Emergency Response Framework, 2017.

Applicable Bangladesh legal and institutional instruments. In addition to ESS2 and the Bangladesh Labor Act 2006, as amended, the LMP shall be implemented with explicit reference to the Bangladesh Labour Rules 2015; applicable provisions of the Chittagong Port Authority legal and regulatory framework; dock worker and port labor requirements where relevant; merchant shipping and marine safety requirements; laws and rules administered by the Department of Inspection for Factories and Establishments; the Bangladesh National Building Code for worker accommodation and facilities where applicable; fire prevention and firefighting requirements administered by the Fire Service and Civil Defence; environmental requirements administered by the Department of Environment; and any project-specific permit, license, inspection, or certification conditions applicable to marine works, dredging, port construction, worker accommodation, emergency preparedness, and OHS. Contractors shall cross-reference these requirements in site-specific plans rather than relying only on generic ESS2 provisions.

Specific legal instruments to be reflected in contractor plans. The LMP, contractor Labor Management Plans, OHS Plans, Workers' Camp Management Plans, and relevant method statements shall specifically reference and operationalize the following instruments (as well as any relevant ones to the activities carried out), as applicable to the Bay Terminal works:

- **The Bangladesh Labour Act, 2006, as amended in 2018:** establishes the core legal framework for employment conditions, wages, working hours, leave, welfare, compensation, trade unions, industrial relations, child and adolescent labor, forced labor, and workplace health and safety.
- **Bangladesh Labour Rules, 2015:** provide implementing rules under the Labour Act, including requirements on employment records, occupational safety, welfare facilities, outsourcing or labor supply arrangements, accident reporting, worker welfare, and inspection-related compliance.
- **The Chittagong Port Authority Ordinance and related CPA requirements:** provide the institutional and operational basis for port management, access control, marine safety, port operations, navigation, emergency response, and coordination with CPA for works within or affecting port jurisdiction.
- **Dock Workers (Regulation of Employment) framework, where relevant:** shall be considered for any stevedoring, loading, unloading, dock labor, cargo handling, or port labor activities, including worker registration, deployment, safety, welfare, and employment arrangements applicable to dock workers.

- **Bangladesh merchant shipping and marine safety laws:** shall be applied to project activities involving vessels, dredgers, barges, tugs, pilotage, marine equipment, navigation, crew safety, marine traffic, pollution prevention, emergency response, and offshore or nearshore construction logistics.
- **DIFE occupational safety provisions:** requirements administered by the Department of Inspection for Factories and Establishments shall guide inspection readiness, accident reporting, workplace safety controls, welfare facilities, machinery safety, competent-person certification where applicable, and compliance monitoring by contractors and subcontractors.
- **Bangladesh National Building Code safety criteria:** shall apply, where relevant, to the design, construction, operation, and safety of worker accommodation, site offices, temporary facilities, storage areas, workshops, emergency exits, electrical systems, structural stability, sanitation, and fire-life-safety measures.
- **Fire Prevention and Fire Fighting Act and related Fire Service and Civil Defence requirements:** shall guide fire prevention, fire detection and suppression, emergency access, evacuation routes, drills, fire safety certification where required, storage of fuel and hazardous materials, hot-work controls, and coordination with fire authorities.

Bangladesh's labor legislation reforms have undergone significant revisions to align more closely with the Environmental and Social Standard 2 (ESS2), aiming to promote worker rights, enhance gender equality, and build resilience against environmental risks. The reforms include a reduction in the union formation threshold, improvements in wage policies, enhanced gender-sensitive governance frameworks, and adaptive mechanisms to protect workers from climate-induced hazards.

For this project, the legal review must also consider other applicable regulatory instruments and institutional mandates relevant to port and marine works, including Bangladesh port authority requirements, merchant shipping and marine safety requirements, dock worker safety requirements, construction safety requirements, environmental conservation legislation, DIFE inspection requirements, and any applicable requirements for special economic, port, or customs-controlled areas. Where these requirements are more specific than general labor provisions, contractors shall incorporate them into site-specific Labor Management Plans, OHS Plans, emergency response plans, and worker accommodation plans.

4.1 Child and Forced Labor

Bangladesh's Children Act 2013 identifies anyone under the age of 18 as a child, while the Bangladesh Labor Act 2006 prohibits employment of children under 14 and permits limited light work for adolescents under prescribed conditions. For this project, the higher and more protective project standard will apply: no workers under 18 years of age will be engaged in any project activity. This requirement applies to direct workers, contracted workers, subcontracted workers, labor supplied through intermediaries, migrant workers, and primary supply workers. Age verification shall be completed before recruitment using legally recognized documents such as a National Identification Card, birth certificate, passport, or other acceptable official documentation. Contractors shall conduct awareness sessions for communities, labor suppliers, subcontractors, and recruitment personnel on the prohibition and negative impacts of child and forced labor.

4.2 Health and Safety Offences in Bangladesh

There are five offences in the Bangladesh Labor Act, 2006 specifically relating to health, safety and welfare – the selling of unguarded machinery (Section 208), failure to give notice of an accident (Section 290), a breach causing

death (Section 309a), a breach causing grievous bodily harm (Section 309b) and a breach causing any harm (Section 309c).

In addition, there is a 'catch-all' offence that allows prosecutions against "whoever contravenes of fails to comply with any provisions of the Code, or any rules of scheme made under it" – which is punishable by up to 3 (three) months imprisonment or with a fine of up to BDT 1,000 (One thousand) or both (Section 307). This offence would, for example, apply to any breach of the obligations involving health, safety and welfare, not already covered by the offences above. A repeat conviction for the same offence can result in double the fine or sentence of imprisonment (Section 308).

When there has been a breach of a duty imposed upon an employer, any one of individuals defined as an employer can be prosecuted. In addition, when a company is prosecuted, "every director, partner, shareholder or manager or secretary or any other officer or representative directly involved in [its] administration" shall be deemed guilty unless he can prove the offence has been committed without his knowledge.

4.3 Bangladesh Labor Act 2006

Bangladesh Labor Act 2006 is specific to labor and working conditions. This act focuses on the protection of the basic rights of workers, fostering constructive worker-management relationships, as well as promoting fair treatment and the provision of a safe and healthy workplace.

While Bangladesh has made significant strides in updating its labor legislation, gaps remain in fully integrating the ESS2 guidelines into domestic law. A closer measure of alignment with social safeguard principles is seen through the national debate on trade union participation levels and wage adjustments. For example, the reduction of union membership requirements facilitates easier formation of unions but may also risk diluting collective bargaining power if not properly balanced by other supportive measures[5] . Meanwhile, the pronounced wage increase for lower-grade workers—a 76.7 percent rise—signals progress towards compensatory reforms; however, these gains need to be reinforced by improved occupational health and safety (OSH) standards.

Aligning with international standards could potentially reduce workplace injuries by a significant margin and improve overall productivity, although precise percentages require further in-depth studies. This quantitative evidence suggests that investment in comprehensive safety regulations could yield substantial returns in terms of reduced healthcare costs and improved labor market outcomes.

In addition to the general legislative improvements, gender equity remains a critical dimension of labor policy reform in Bangladesh. Women's economic empowerment is an essential component of social sustainability, and studies have shown that gender-sensitive labor policies contribute to more inclusive and equitable economic growth. Internal analyses indicate that improvements in labor legislation have begun to address disparities, such as ensuring equal pay for work of equal value. Moreover, evidenced by various interventions aimed at enhancing workplace safety and dignity in sectors with high female employment—like the shrimp and prawn industry—there are actionable pathways to advance gender parity. While reforms have increased women's participation in the

[5] https://worldbankgroup.sharepoint.com/sites/IBArchive/Shared%20Documents/Forms/AllItems.aspx?id=%2Fsites%2FIBArchive%2FShared%20Documents%2F2021%2FOfficialUseOnly%2FBetter%20Work%20Bangladesh%20Gender%20Strategy%202020%2D2022%2Epdf&parent=%2Fsites%2FIBArchive%2FShared%20Documents%2F2021%2FOfficialUseOnly%2F

workforce, continued efforts are necessary to create environments where female workers are equally protected under both labor and environmental standards[6].

A major challenge lies in the enforcement of the updated standards. Despite the clear legislative revisions, there remains a significant enforcement gap driven partly by resource constraints. Internal assessments reveal that many labor-intensive sectors suffer from inadequate institutional capacity and technical expertise to ensure effective compliance. Another key obstacle is the persistent policy gap between the regulatory provisions and their actual field-level implementation. Institutional coordination presents an additional layer of complexity. Internal reports point to limited inter-agency collaboration in enforcing labor laws, especially within sectors that require technical oversight.

The structure of Bangladesh's economy further compounds these challenges. With a large share of economic activity in labor-intensive industries and a workforce that is often underpaid, there is constant pressure on employers to cut costs, sometimes at the expense of worker rights. Internal studies suggest that insufficient investment in technological and operational upgrades inhibits the enforcement of labor standards, while external assessments underscore that sustainable improvement will require both upward pressure from international buyers and proactive domestic policy measures

Alignment of Bangladesh Legislation with the requirements of ESS2[7]

ESS2 requirements	Support	Provisions in the Labour Act	Measures to be implemented by the project or to fill any Gaps
Procedural and documentary requirements			
Assessment of risks and impacts related to labor and working conditions for proposed projects, plans, and programs	Not supported	The labor laws do not require that labor risks and issues be considered in the EIA or project planning and vetting.	A project specific Labor Management Procedure will be developed and implemented throughout the project lifecycle and incorporated into bidding and contract documents / POM
Labor-management procedures and plans submitted and vetted during project planning	Not supported	The labor laws do not apply to project planning and vetting. Hence, no labor planning document is required.	The PIU shall prepare, disclose, and implement this LMP before project implementation and require contractors to prepare site-specific Labor Management Plans, OHS Plans, Labor Influx Management Plans, Workers' Camp Management Plans where applicable, SEA/SH Action Plans, worker GRM procedures, and Codes of Conduct for PIU review and approval before mobilization.
Key elements of ESS2			

[6] https://worldbankgroup.sharepoint.com/sites/DNRINT/Shared%20Documents/Forms/AllItems.aspx?id=%2Fsites%2FDNRINT%2FShared%20Documents%2FIDU%2De1905823%2Da9ea%2D4d57%2D9779%2D3fb81100d14a%2Epdf&parent=%2Fsites%2FDNRINT%2FShared%20Documents

[7] Reference the World Bank Overview Assessment for Bangladesh Labor and Working Conditions

ESS2 requirements	Support	Provisions in the Labour Act	Measures to be implemented by the project or to fill any Gaps
Prohibition on use of child labor	Fully supported	Adolescents ages 14–18 must secure a certificate of fitness to work in a factory but only on non-dangerous tasks. Children ages 12–14 may work on light tasks during working hours that do not interfere with schooling. Children below 12 are not allowed to work.	No workers under the age of 18 will be allowed to work on the project.
Prohibition on use of forced labor (that is, compulsory labor such as indentured labor, bonded labor, or similar labor-contracting arrangements).	Fully supported		No forced or child labor will be tolerated. No trafficked persons will be employed in connection with the project. Systems will be in place to monitor and immediately respond to incidences identified.
Equal opportunity and nondiscrimination in recruitment and hiring; compensation (including wages and benefits); working conditions and terms of employment; access to training, job assignments, and promotions; termination of employment or retirement; or disciplinary practices	Partially supported	The law contains important provisions prohibiting discrimination based on sex and disability, including equal wages for equal work. However, there is no mention of prohibition of discrimination against ethnicity or religion.	The project will apply a non-discrimination and equal opportunity policy covering sex, disability, ethnicity, religion, nationality, migrant status, language, age where legally relevant, and other personal characteristics. Requirements will be included in contracts, Codes of Conduct, recruitment procedures, training, supervision, and worker GRM arrangements. Statistics on diversity arrangements will be reported as part of the project KPI.
Zero tolerance of SEA/SH at workplace	Partially supported	The law and rules contain an important provision on creating a harassment-free environment in the workplace. There is elaboration regarding what SH is and a mechanism is set up to ensure implementation.	Detailed monitoring and reporting on any SEA/SH incidents to the Bank. Reference should be made to the project SEA-SH Action Plan.
Basic worker rights			
Terms and conditions of employment are clear	Fully supported		All project workers shall receive written employment particulars or contracts in a language they

ESS2 requirements	Support	Provisions in the Labour Act	Measures to be implemented by the project or to fill any Gaps
			understand, including job title, wage rate, payment interval, working hours, overtime, leave, benefits, deductions, notice, disciplinary rules, Code of Conduct, GRM access, and OHS obligations before deployment.
Project workers will be paid on a regular basis	Fully supported	Wages must be paid before the expiry of the 7th working day after the last day of the wage period.	Contractors shall pay wages on time through documented payroll, signed pay slips, or verifiable electronic payment systems. The PIU may withhold contractor payments where wage arrears, unlawful deductions, recruitment fees, or non-payment of overtime are identified until corrective action is completed.
Adequate periods of rest per week; annual holiday, sick, maternity, and family leave	Fully supported	48 hours per week extendable up to 60 hours with 12 hours overtime.	Contractors shall comply with national requirements and ESS2 on working hours, overtime, rest periods, weekly rest, annual leave, sick leave, maternity leave, and other statutory benefits. Working hours and overtime shall be recorded, monitored, and reported monthly, with fatigue controls for marine, port, shift, and night work.
Project workers will receive written notice of termination of employment and details of severance payments in a timely manner	Fully supported		Contracts shall require written notice of termination, payment of all outstanding wages and benefits, and severance or other entitlements in accordance with national law and employment terms. Demobilization records shall be maintained and made available to the PIU and supervision consultant.
Access to facilities (including women-friendly facilities such as separate toilets and better lighting)	Fully supported		Contractors shall provide safe, accessible, gender-separated, well-lit, hygienic, and adequately maintained toilets, washing areas, drinking water points, rest areas, changing facilities, and accommodation facilities where applicable, including privacy and security measures for women

ESS2 requirements	Support	Provisions in the Labour Act	Measures to be implemented by the project or to fill any Gaps
			workers and persons with disabilities where feasible.
Protection of workers			
OSH with EHSG and GIIP	Partially supported	OSH will be influenced by GIIP and the WB EHSG	Implementation of the WBG EHSG in all project activities.
Appropriate measures of protection and assistance to address project workers' vulnerabilities			
Protection of minors at work	Fully supported	Adolescents (ages 14–18) shall be assigned only light work and not be assigned to dangerous tasks.	No workers under the age of 18 will be allowed to work on the project.
Protection of women and provision of needs	Fully supported	Eight weeks paid maternity leave for expectant mothers is mandatory.	The project shall ensure maternity protections, non-discrimination in hiring and employment, safe transport and facilities where relevant, gender-separated sanitation and accommodation, SEA/SH prevention measures, confidential reporting channels, and access to survivor-centered referral services.
Protection of persons with disabilities (PWD) and provision of needs	Supported	Rights and Protection of Persons with Disability Act 2013 provides for right to discrimination-free employment opportunities.	The project shall apply non-discrimination in recruitment and employment, provide reasonable accommodation where feasible, ensure accessible grievance channels and facilities where practicable, and require contractors to consider safe task allocation and workplace adjustments for workers with disabilities.
Safe working conditions and vulnerabilities of women workers		Labour Act and Labour Rules mandate that workplaces be free of sexual abuse and harassment.	Contractors shall implement SEA/SH Action Plans, Codes of Conduct, worker induction and refresher training, confidential complaint handling, survivor-centered referral pathways, safe transport and accommodation arrangements, separate sanitation facilities, adequate lighting, and supervision of worker-community interactions.

ESS2 requirements	Support	Provisions in the Labour Act	Measures to be implemented by the project or to fill any Gaps
Migrant workers	Not supported	Labour Act does not have any special provisions for migrant workers.	Contractors shall ensure lawful recruitment and employment of domestic migrant and foreign workers, work permits where required, no worker-paid recruitment fees, no retention of identity documents, employment terms in languages workers understand, safe accommodation, equal treatment, and access to worker GRM and OHS training.
Applicability to types of projects workers			
Direct workers – workers directly engaged by the project	Partially supported	Labour Act does not apply to (a) government offices; (b) security printing press and ordnance factories; (c) charitable establishments like hospitals, old age homes, orphanages, asylums, and so forth; (d) shops or stalls set up for any public or charitable purpose; (e) educational, training, and research institutions; (f) nonprofit hostels and messes; and (g) small agricultural farms and small establishments run solely by family members and domestic hands (Labour Act, Section I(4)).	Government officials working on the project will remain subject to their existing public employment terms, but ESS2 requirements on OHS, SEA/SH prevention, non-discrimination, and access to project grievance channels will apply where relevant. Consultants and PIU-hired staff shall receive written terms consistent with the LMP.
Contracted workers – workers hired by third parties	Fully supported	Labour Act covers workers hired through a contractor (Labour Act Section 2(65)), except for establishments mentioned in Section I(4). The law requires that all contracting agencies supplying workers be formally registered, and workers should first be the responsibility of the contracting agency.	All contracts shall require contractor and subcontractor compliance with the LMP, ESS2, national law, OHS Plans, Codes of Conduct, SEA/SH provisions, worker GRM, wage and working-hour requirements, labor supplier controls, and monthly labor reporting. Subcontractors and labor suppliers shall be disclosed and monitored.

ESS2 requirements	Support	Provisions in the Labour Act	Measures to be implemented by the project or to fill any Gaps
Special consideration for community workers	Not supported	Labour Act does not recognize community workers as defined in ESS2. Hence, the act does not provide any special considerations for such contracting arrangements.	The project is not expected to use community workers. If community workers are later engaged, the PIU shall update the LMP to include ESS2 requirements on voluntary participation, terms of engagement, OHS, child and forced labor prohibition, non-discrimination, and grievance access before engagement.
Primary supply workers	Not supported	Workers provided by a supplier are the responsibility of the supplier.	Primary supply workers will be covered by the relevant terms and conditions of this LMP. Reporting on primary supply workers should be included as part of the regular reporting requirements.
Other rights			
Worker representation, grievance access, and labor-management engagement.	Partially supported	National law recognizes freedom of association, but subcontracted and temporary workers may face practical barriers to representation and grievance raising.	Contractors shall facilitate worker information sessions, confidential grievance channels, non-retaliation commitments, worker-management meetings, and selection or election of worker representatives where appropriate, including representation for subcontracted workers, migrant workers, women workers, and camp residents. Awareness materials shall be provided in local language and other languages understood by workers.
Freedom of association and collective bargaining	Fully supported	Employees are allowed to form unions with at least 20 percent of employees participating, but the government does not permit any unionization in the export processing zones.	The project shall respect workers' rights to form and join workers' organizations and bargain collectively in accordance with national law. Contractors shall not discriminate or retaliate against workers for lawful organizing, representation, or grievance-related activities. These arrangements shall include transparent elections or selection processes for worker

ESS2 requirements	Support	Provisions in the Labour Act	Measures to be implemented by the project or to fill any Gaps
			representatives, with participation open to different worker categories, work shifts, women workers, migrant workers, subcontracted workers, and workers in accommodation facilities, without interference by contractors or labor suppliers. • Elections for worker representatives: Contractors shall facilitate transparent, inclusive, and documented elections or selection of worker representatives at each major work site, camp, marine work front, and shift arrangement. Representatives shall be selected by workers themselves and shall be able to raise labor, OHS, accommodation, discrimination, SEA/SH-related procedural concerns, and welfare issues without interference. • Private channels for grievances: The worker GRM shall include confidential and private channels, including options for direct submission to the contractor GRM focal point, PIU or supervision consultant focal point, sealed complaint boxes, telephone or digital channels where feasible, and separate confidential handling for SEA/SH-related complaints. Workers shall not be required to submit grievances through supervisors, labor suppliers,

ESS2 requirements	Support	Provisions in the Labour Act	Measures to be implemented by the project or to fill any Gaps
			or worker representatives if they prefer another channel. • Protection against reprisals: Retaliation, intimidation, dismissal, demotion, wage withholding, blacklisting, threats, harassment, or adverse work assignment against any worker who raises a concern, participates in a grievance process, serves as a worker representative, cooperates with an audit, or reports unsafe conditions shall be prohibited and treated as serious non-compliance. • Multilingual awareness programs: Contractors shall provide induction, refresher training, toolbox talks, posters, worker handbooks, and camp briefings in languages and formats understood by the workforce, including Bangla and other relevant languages for migrant or foreign workers. Awareness shall cover employment terms, wages, working hours, OHS, Code of Conduct, SEA/SH prevention, worker GRM, freedom from retaliation, worker representative roles, and emergency procedures. • Regular labor-management meetings: Contractors shall hold regular labor-management meetings with worker representatives, labor and OHS focal points, camp managers where relevant,

ESS2 requirements	Support	Provisions in the Labour Act	Measures to be implemented by the project or to fill any Gaps
			subcontractors, and worker groups. Meetings shall be held at least monthly during construction and more frequently for high-risk marine works, peak labor periods, accommodation-related concerns, serious incidents, or repeated grievances. Minutes, attendance, issues raised, agreed actions, responsibilities, and timelines shall be recorded and shared with the PIU and supervision consultant.
Access to grievance redress mechanism	Fully supported	Employees can seek direct civil law redress from the labor courts for complaints regarding terms and conditions of employment and wages. Health, safety, maternity welfare, and child-labor offenses are subject to criminal prosecution.	The project shall establish a worker GRM for direct, contracted, subcontracted, migrant, and primary supply workers. The mechanism shall be accessible, confidential, non-retaliatory, communicated in languages workers understand, linked to SEA/SH survivor-centered referral procedures, and reported monthly to the PIU.
Ensure appropriate implementation	Partially supported	No provisions in the law that require development projects to consider, as part of project planning and design, labor-management issues or risks of noncompliance with labor-management standards. Thus, there is no organizational mechanism, financial resource, or trained human resource. The existing regulations set the standard. However, the standard cannot be fully implemented	The PIU shall designate qualified environmental, social, labor, OHS, and SEA/SH focal points and allocate resources for LMP implementation. Contractors shall appoint labor, OHS, camp management, SEA/SH, and community liaison focal points, submit monthly reports, and implement corrective action plans under PIU and supervision consultant oversight.

ESS2 requirements	Support	Provisions in the Labour Act	Measures to be implemented by the project or to fill any Gaps
		because of the lack of such a mechanism or resource.	
Ensure interagency collaboration	Not supported	MOLE, with its relevant directorate and department, does not have any official linkage to the other related agencies (such as the DOE) to coordinate and/or collaborate. For example, in issues related to child labor or SEA/SH, there is no linkage between the MOLE and the Ministry of Women and Children's Affairs (MOW&CA).	The PIU shall establish coordination arrangements with Chittagong Port Authority (CPA), DIFE, Ministry of Labour and Employment, Department of Environment, Coast Guard, Navy, Fire Service and Civil Defence, local government, law enforcement, health providers, and SEA/SH service providers, including referral pathways, emergency drills, and incident reporting protocols. These arrangements shall be operationalized through the Institutional Coordination and Emergency Response Matrix in Section 5.

In summary, while legislative reforms demonstrate progress toward aligning Bangladesh's labor policies with ESS2, significant challenges remain. Without substantial capacity building, regular monitoring, independent verification, and enhanced inter-agency coordination, reforms may not lead to the expected improvements in labor conditions. The Institutional Coordination and Emergency Response Matrix in Section 5 provides the project-level mechanism for clarifying roles, escalation pathways, response timelines, and corrective action responsibilities.

5. Institutional Coordination and Emergency Response Matrix

The PIU shall maintain an institutional coordination and emergency response matrix to clarify lead responsibility, reporting hierarchy, communication protocols, response timelines, and coordination arrangements for labor, OHS, marine, climate, accommodation, SEA/SH, and contractor compliance matters. The matrix shall be reviewed and updated as part of the contractor contracts and finalized before contractor mobilization, after any major incident, and at least annually during implementation. References to CPA in this matrix mean the Chittagong Port Authority.

Coordination / Emergency Area	**Responsible Party / Function**	**Supporting Parties / Functions**	**Key Responsibilities and Communication Protocol**	**Indicative Response Timeline / Output**
Overall LMP implementation and contractor oversight	PIU / Chittagong Port Authority (CPA) Project Director and designated labor, social, and OHS focal points	Supervision consultant, contractors, subcontractors.	Maintain LMP implementation arrangements; approve contractor labor, OHS, accommodation, influx, SEA/SH, and emergency plans; convene monthly coordination meetings; review contractor reports, audits, grievances, incidents, and corrective actions.	Monthly coordination minutes; approved plans before mobilization; corrective action register updated monthly.
Serious labor incident, fatality, major injury, forced labor, child labor, wage non-payment, or retaliation	PIU / Chittagong Port Authority (CPA) Project Director and designated labor, social, and OHS focal points	Contractor. Supervision consultant, DIFE, labor supplier, subcontractor, medical provider, law enforcement where legally required	Secure the site, provide medical assistance, prevent retaliation, notify PIU, preserve evidence, begin root-cause review, report to relevant authorities as required, and implement corrective and preventive actions.	Immediate verbal notice; written initial report within 24 hours; investigation and corrective action plan within 7 days or as required by PIU.
Marine emergency, collision, drowning, diving incident, dredging accident, or unsafe sea condition	PIU / Chittagong Port Authority (CPA) Project Director and designated-focal point	Contractor - marine works area (if available) Coast Guard, Navy where relevant, port control / VTMS, rescue providers, medical providers, supervision consultant	Activate marine emergency plan; suspend affected works; initiate rescue and medical response; coordinate vessel movement restrictions; secure diving operations; communicate with CPA and emergency authorities; inspect before restart.	Immediate emergency activation; restart only after documented inspection, clearance, and corrective actions.

Coordination / Emergency Area	Responsible Party / Function	Supporting Parties / Functions	Key Responsibilities and Communication Protocol	Indicative Response Timeline / Output
Cyclone, tidal surge, monsoon marine conditions, lightning, extreme heat, or other severe weather event	PIU / Chittagong Port Authority (CPA) Project Director/PD's representative and Contractor	Local disaster management authorities, Fire Service and Civil Defence, Coast Guard, health providers, supervision consultant	Monitor warnings and heat-risk thresholds; suspend high-risk work; evacuate workers where required; secure equipment, vessels, camps, and materials; communicate instructions to workers in languages understood; verify safe restart.	Action according to warning level and approved thresholds; post-event inspection before restart; drill records at least annually and before cyclone season.
Fire, explosion, hazardous materials release, or camp emergency	PIU / Chittagong Port Authority (CPA) Project Director/PD's representative and Contractor	Fire Service and Civil Defence, local health providers, Department of Environment where relevant, supervision consultant	Activate emergency response and evacuation plan; account for workers; provide first aid and medical referral; notify authorities; control hazardous materials; secure site and prevent re-entry until cleared.	Immediate response; authority notification as legally required; evacuation drill records and inspection certificates maintained.
Worker accommodation, health, sanitation, wastewater, solid waste, and vector control	PIU / Chittagong Port Authority (CPA) Project Director /PD's representative and social/OHS focal points	Contractor; Local health authorities, Fire Service and Civil Defence, Department of Environment, local government, supervision consultant	Maintain camp management plan; obtain inspections and certifications where applicable; monitor water, sanitation, food safety, fire safety, wastewater, solid waste, vector control, gender-sensitive facilities, and camp grievances.	Camp inspection before occupancy and monthly thereafter; corrective actions tracked until closure.
SEA/SH complaint, referral, or protection concern	PIU SEA/SH focal point and trained contractor SEA/SH focal point	Qualified SEA/SH service providers, worker GRM operator, health and psychosocial referral services, law enforcement only with survivor consent or legal requirement	Apply survivor-centered, confidential procedures; do not investigate beyond agreed protocols; provide referral information; protect against retaliation; record only non-identifying information for reporting.	Immediate referral information; confidential non-identifying reporting according to project SEA/SH Action Plan.

Coordination / Emergency Area	Responsible Party / Function	Supporting Parties / Functions	Key Responsibilities and Communication Protocol	Indicative Response Timeline / Output
Independent monitoring, audits, inspections, and contractor performance enforcement	PIU and supervision consultant	Independent labor/OHS auditor where required, DIFE, contractors, subcontractors, labor suppliers	Review KPIs, audit findings, worker interviews, payroll records, supplier records, OHS performance, grievances, accommodation inspections, and corrective actions; apply contractual remedies for persistent non-compliance.	Monthly KPI review; independent audit frequency based on risk; corrective action closure verified before payment or mobilization milestones where applicable.

5. BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

This section sets out the key aspects of national labor legislation and good international industry practice relevant to occupational health and safety, with particular emphasis on marine construction, dredging, underwater works, port operations, heavy lifting, hazardous materials, worker accommodation, emergency preparedness, and climate-related worker safety risks.

5.1 Key OHS legislation

The special provision related to OHS and working condition has been stipulated in the Bangladesh Labor Act 2006, ESS 2 and ESS 4and The IFC General EHS Guidelines 2007. The provisions are made to protect the labor and concerned people at the workplace against hazards to safety and health arising in connection with the activities. This act entrusts the employer with the obligation to ensure the safety and health of all its employees, and also to mitigate risks of exposure to any hazards in the workplace.

There are basically two additional components of OHS that relates to the adjacent community. One is the physical safety of project communities who are exposed to the project activities during construction and operation, including risks of accidents and risks of violence due to increase in crimes and cultural conflict between locals and migrant population. The other pertains to the exposure and/or increased risks of diseases by the community due to influx of people during construction and operation and due to the changes in the project area, including pollution and ecological change. The legal obligations on OHS, applicable to LMP of project, are listed below:

- Provision to demonstrate OHS policy at workplace
- Provision of OHS risk for the waste management workers
- Responsibility of employers towards worker such as information, facility, personal protective equipment and training on all kinds of OHS related training
- Provision regarding the protection of non-labors such as visitors and others
- Fundamental provision on Occupational Health and Safety (OHS) including role and responsibility of manufacturer, importer and suppliers for assurance of OHS for their goods and services
- Provision of non-discrimination based on caste/ethnicity, gender, religion, language, origin and ideology

- Provision responsibility towards employee such as information, facility, personal protective equipment and training on OHS and responsibility of laborers for work and use of safety gears
- Provision for appointment responsible person (OHS Officer) at the workplace for OHS implementation. Under this there will be joint safety and health committee comprising of supervisor and workers at the worksite
- Provision for immediate shutdown of work and machineries in case of severe COVID-19 concern.
- Special provision for OHS for eye protection, protection against harmful chemicals, operation of pressurized machine/vessel, machine guarding, handling/lifting of load, fire protection, provision against fatigue
- Provision for treatment and prevention of communicable diseases
- Provision of onsite first aid and primary health care
- Provision of accident investigation, inventory of work-related diseases and compensation
- In the Bangladesh Labor Law health and hygiene related provisions are mentioned at section 51 to 60 and safety of workers related provisions are mentioned at section 61 to 78.

Cleanliness: As per section 51, every establishment shall be kept clean and free from effluvia arising from any drain, privy or other nuisance. The floors of every workroom shall be cleaned regularly, effective means of drainage shall be provided and maintained, the factory shall be re-painted or re varnished at least once in every three years and be cleaned at least once in every fourteenth months, finally the date on which the processes are carried out shall be entered in the prescribed register.

Ventilation and temperature: Section 52 of the law states that, in every workroom and in every establishment, adequate ventilation by the circulation of fresh air and comfortable temperature shall be maintained to prevent workers' injury to health.

Dust and fume: As per the section 53 of the law, in every establishment effective exhaust appliance shall be applied as near as possible to the point of origin of the dust, fume or other impurity, which are likely to be injurious to the workers and such point shall be enclosed so far as possible.

Disposal of wastes and effluents: According to Section 54, effective arrangements shall be made in every establishment for disposal of wastes and effluents due to the manufacturing process carried on therein.

Overcrowding: As per Section 56 of the Act, to prevent injury to the health of the workers, overcrowding of every workroom in any establishment shall be prevented and at least 9.5 cubic meter of space for every worker employed in a workroom in the establishment shall be provided.

Lighting: As per section 57 of the Act, in every part of an establishment where workers are working or passing, there shall be provided and maintained sufficient and suitable lighting, natural or artificial, or both and all glazed windows and skylights used for the lighting of the work-room shall be kept clean on both the outer and inner surfaces and free from obstruction as far as possible.

Drinking water: As per section 58 of the act, effective arrangement of sufficient supply of wholesome drinking water for all workers employed in every establishment shall be provided and maintained at a suitable point conveniently situated therein.

Latrines and urinals: As per section 59 of the act, in every establishment sufficient latrine and urinal, separately for male and female workers, adequately lighted, ventilated, conveniently situated and accessible to workers at all times while they are in the establishment shall be provided and maintained in a clean and sanitary condition at all times with suitable detergents and disinfectants.

Dustbin and spittoon: As per section 60 of the act, in every establishment there shall be provided, at convenient places, a sufficient number of dustbins and spittoons which shall be maintained in a clean and hygienic condition. No person shall throw any dirt or spit within the premises of an establishment except in the dustbins and spittoons provided for the purpose.

Fire safety: Section 62 of the act states that every establishment shall be provided with at least one alternative connection stairway with each floor and such means of escape in case of fire and for carrying fire-fighting apparatus. In every establishment the doors providing an exit from any room shall not be locked or fastened so that they can be easily and immediately opened from inside while work is being carried on in the room. In every establishment, every window or other exit affording means of escape in case of fire shall be distinctively marked in red Bangla letters of adequate and clearly understandable size. A free passageway giving access to each means of escape in case of fire shall be maintained for the use of all workers in every room of the establishment.

Fencing of machinery: Section 63 of the act states that, in every establishment all dangerous machinery must be securely fenced; e.g., every moving part of a prime mover and every fly wheel connected to a prime mover, the head-race and tail-race of every water wheel and water turbine, every part of an electric generator, every part of transmission machinery and every dangerous part of any machinery.

Work on or near machinery in motion: Section 64 of the act states that, work on or near machinery in motion shall be carried out only by a specially trained adult male worker wearing tight-fitting clothing whose name has been recorded in the register prescribed in this behalf and while engaged he shall not handle a belt at a moving pulley unless the belt is less than fifteen centimeters in width and unless the belt-joint is either laced or flush with the belt.

Cranes and other lifting machinery: Section 68 of the act states that, every part of cranes and other lifting machinery, including the working gear, whether fixed or movable, ropes and chains and anchoring and fixing appliances shall be of good construction, sound material and adequate strength, properly maintained, thoroughly examined by a competent person at least once in every period of twelve months and a register shall be kept containing the prescribed particulars of every such examination.

Hoists and lifts: Section 69 of the act states that, in every establishment every hoist and lift shall be of good mechanical construction, sound material and adequate strength, properly maintained, shall be thoroughly examined by competent person at least once in every period of six months, a register shall be kept containing the prescribed particulars of every such examination, every hoist way and lift way shall be sufficiently protected by an enclosure fitted with gates, and the hoist or sift and every such enclosure shall be so constructed as to prevent any person or thing from being trapped between any part of the hoist or lift and any fixed structure or moving part, every gate shall be fitted with interlocking or other efficient device to secure that the gate cannot be opened except when the cage is at the landing and that the cage cannot be moved unless the gate is closed.

Excessive weights: Section 74 of the act states that, no person shall be employed in any establishment to lift, carry or move any load so heavy as to be likely to cause him injury.

6. RESPONSIBLE STAFF

This section identifies the institutional responsibilities for engagement and management of project workers, management of contractors and subcontractors, OHS, worker training, worker accommodation, SEA/SH prevention, grievance redress, emergency response, and monitoring and reporting.

The PIU will have overall responsibility for implementation of this LMP and for ensuring implement this LMP on this project and ensure the focal point for environmental, social, labor, OHS, and SEA/SH . Contractors shall appoint qualified labor, OHS, community liaison, camp management, and SEA/SH focal points before mobilization. The PIUs or the designated personnel of PIU will coordinate, as required, with Chittagong Port Authority, DIFE, Ministry of Labor and Employment, Department of Environment, Coast Guard, Navy, Fire Service and Civil Defence, local government, law enforcement, and relevant emergency response agencies. Coordination arrangements shall be documented in the contractor's site-specific plans and tested through periodic drills.

The PIU shall ensure that labor influx risks and mitigation measures are included in stakeholder engagement activities. Community engagement shall begin before worker mobilization and continue throughout construction. Consultations shall include women, men, youth, vulnerable groups, local service providers, community leaders, local government, health providers, law enforcement, and civil society organizations, using separate consultations where needed to enable women and vulnerable groups to participate safely and meaningfully. The PIU and contractors shall appoint community liaison focal points to receive feedback, disclose information on labor influx risks and mitigation measures, and coordinate timely responses to community concerns.

Summary of Risks, Mitigation Measures and Responsible Parties

Potential Impacts/Risks	Mitigation Measures	Responsibility
Engagement of child and forced labor	• Verify NID cards and/or birth certificate • Sessions on awareness raising within the local community and contractors • Prepare and implement code of conduct • Engagement of labor expert/focal point	**Implementation:** Contractors/sub-contractors **Supervision:** PIUs will supervise construction activities at the Bay Terminal marine and port work sites, including contractor yards, labor accommodation, access routes, dredging support areas, and primary supply interfaces.
Risk of potential transmission of infectious diseases	• Conducting pre-employment health check • Controlling entry and exit from site/workplace • Adequate and designed accommodation arrangements to reduce contact with the community • Reviewing contract durations, to reduce the frequency of workers entering/exiting the site	Same as above

Potential Impacts/Risks	Mitigation Measures	Responsibility
	• Rearranging work tasks or reducing numbers on the worksite to allow social/physical distancing, or rotating workers through a 24-hour schedule • Providing appropriate forms of PPE • Putting in place alternatives to direct contact, like tele-medicine appointments and live stream of instructions	
Risk of labor Influx	• Development of a management plan for social and environmental impacts in consultation with affected communities • Implementation of appropriate mitigation and monitoring programs, which includes development and implementation of a stakeholder engagement program • Establishment of a grievance redress mechanism (GRM) for workers and community; and • Monitoring and supervision, and, as needed, adaptive management actions	Same as above
Sexual harassment of women and girls, exploitative sexual relations, and illicit sexual relations with minors from the local community	• The risk of SEA/SH and discrimination will be mitigated implementing a code of conduct, contract before employing any labor in the work and ensuring necessary training • The Contractor's monthly training program will also cover topics related to Code of Conduct such as discrimination, sexual harassment, particularly towards women and children, violence, including sexual and/or gender-based violence and respectful attitude while interacting with the local community • Contractor engaged Labor Expert will be responsible to ensure the mitigation measure	Same as above
Hazardous work and process	• The risk will be mitigated by Contractor, providing PPE for workers, such as safety shoes, helmets, safety vests, masks, gloves, protective clothing, goggles, full-face eye shields and ear protection based on the work requirements • Workers shall maintain the PPE properly by cleaning dirty ones and replacing damaged ones • Contractors must engage a minimum of one Occupational Health and Safety representative who will be responsible to ensure the mitigation measure	Same as above
Accidents or emergencies: exposure to unsafe machineries, flammable chemicals/fuel, construction materials,	• The risk will be mitigated by Contractor hiring trained operators for the safe operation of specialized vehicles such as forklifts, including safe loading and unloading. Moving equipment with restricted rear visibility shall be outfitted with audible back-up alarms. • Flagman will be provided to each moving equipment operator to guide the movement of equipment. • The contractor shall mark all energized electrical devices and lines with warning signs.	Same as above

Potential Impacts/Risks	Mitigation Measures	Responsibility
landslide at workplace	• Contractors shall mark the fire escape routes and train the workers on emergency evacuation from the terminal in case of fire. • Emergency drills shall be conducted on a regular basis. • Contractor engaged Occupational Health and Safety representative will be responsible to ensure the mitigation measure.	

7. POLICIES AND PROCEDURES

Project policies and procedures shall include OHS, labor terms and conditions, worker accommodation, recruitment and labor broker management, prohibition of child and forced labor, SEA/SH prevention, worker GRM, emergency preparedness, contractor reporting, and monitoring requirements. Separate plans as outlined in this document shall be developed to address each of the identified risks and the Monitoring systems will be established as part of the project's regular monitoring practices.

8. AGE OF EMPLOYMENT

As per Bangladesh Labor Act, 2006, no one below the age of 14 (minimum age) will be employed as a labor. A child over the minimum age (14) and under the age of 18 may be employed or engaged in connection with the project only if the work is not likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development; an appropriate risk assessment is conducted prior to the work commencing.

For the purposes of this project, no workers below 18 years will be employed or engaged in the project.

A certificate of Age and Fitness will be completed and submitted by a licensed medical practitioner (sample in Annex 2) which will include a copy of a legally recognizable form of identification that stipulates the employee's age. The ages of workers will be verified by checking ID and contractor bidding documents and the contract agreement will include a clause about restrictions on the use of child and forced labor

If an underage worker is found, the contractor shall immediately remove the worker from project activities, notify the PIU, assess the circumstances of recruitment, ensure that the worker is not penalized, and facilitate appropriate referral or remediation in line with ESS2 and national law. The PIU and the contractor shall review recruitment records, strengthen age-verification.

cation procedures, and apply sanctions to responsible labor suppliers or subcontractors where non-compliance is identified.

9. TERMS AND CONDITIONS

The Labor Act governs employment terms and conditions. The Act requires employers to provide employees with a copy of the written employment particulars signed by both parties. Contractors will be required to provide written employment to all of their employees for this Project. Contractors will also be required to follow the most recent wage regulation issued by the government and reviewed on a regular basis. The order specifies minimum wages,

working hours, overtime pay, leave entitlements, travel and subsistence allowances, and the provision of protective clothing. Annex 3 has a list of minimum details required in the contractual agreements for each worker.

According to the Act, before a contractor is awarded a public contract, he must certify in writing that the wages, hours, and working conditions or persons to be employed by him on the contract are not less favorable than those contained in the most recent wage regulation issued. If a contractor fails to comply with this requirement, the contract with the contractor may be canceled as an approved contractor. To ensure full compliance with the law in this regard, contractors will be required to provide the project with copies of all of their workforce's Written Particulars of Employment or contracts. Contractors will not be permitted to deploy any employee to work on the Project unless a copy of that employee's employment contract is provided to PIU.

As a monitoring mechanism, the contractor shall be ineligible for payment unless he has filed, along with his claim for payment, the following certificate: - a) stating whether any wages owed to employees are past due; b) stating that all employment conditions of the contract are being met. It will be a material term of the contract for this Project to allow the project to withhold payment from the contractor if the contractor fails to meet their payment obligations to their workers.

Contractors shall prohibit worker-paid recruitment fees and shall disclose all labor suppliers, brokers, and intermediaries used for recruitment. Wage payments shall be documented through payroll records, signed pay slips, or verifiable electronic payment systems. Contractors shall maintain records of working hours, overtime, rest days, leave, deductions, training, grievances, disciplinary action, incidents, accommodation inspections, and worker demobilization. These records shall be available for PIU and supervision consultant review.

The country has ratified numerous ILO Conventions designed to ensure that member countries protect the concept of collective bargaining. The Labor Act was enacted, among other things, to give effect to collective bargaining. The Act allows for collective bargaining of employment terms and conditions. Among other rights, employees the right to join and form a labor organization for the purpose of negotiating favorable terms and conditions for their members.

10. GRIEVANCE MECHANISM

This section describes the worker grievance mechanism for direct, contracted, subcontracted, migrant, and primary supply workers, and explains how workers will be informed of the mechanism in languages and formats they understand.

Section 33 of Bangladesh Labor Act, 2006 explicitly states that every employer, including contractors, to have a Formal Grievance Procedure which should be known and explained to the employee.

(1) Any worker including a worker who has been laid-off, retrenched, discharged, dismissed, removed, or otherwise terminated from employment, who has any complaint in respect of anything and intends to get redress thereof, shall send his complaint in writing to his employer, by registered post within 30 (thirty) days of being informed of the cause of such complaint: Provided that if the appointing authority accepts the complaint directly and acknowledges the receipt thereof in writing, such complaint shall not be required to be sent by registered post.

(2) The employer shall within 30 (thirty) days of receipt of the complaint, make enquiry into the complaint and shall after giving the concerned worker an opportunity of being heard, communicate with him in writing his decision thereon.

(3) If the employer fails to give any decision, or if the concerned worker is dissatisfied with such decision, he may submit a complaint in writing, to the Labor Court within 30 (thirty) days from the date of expiry or, as the case may be, within 30 (thirty) days from the date of the decision of the employer.
(4) The Labor Court shall, on receipt of the complaint, give notice to both the parties and hear their statement on the complaint, and considering the circumstances of the case shall pass such order as it may deem just.
(5) The Labor Court may amongst other reliefs, direct for reinstatement of the complainant in service, with or without arrear wages and convert the order of dismissal, removal or discharge to any minor punishment specified in section 23(2).
(6) Any person aggrieved by an order of the Labor Court, may, within thirty days of the order, prefer an appeal to the Tribunal, and the decision of the Tribunal on such appeal shall be final.
(7) No Court-fee shall be payable for making any complaint or preferring an appeal.
(8) No complaint shall amount to a criminal prosecution under this Act.
(9) No complaint shall lie against an order of termination of employment, unless such order is alleged to have been made for his welfare society activities or passed with an ill motive or unless the worker concerned has been deprived of the benefits specified in that section.

Management of Gender and SEA/SH Related Complaints: Gender based discrimination is to be strictly prohibited and monitored by the PIUs of the Project. The PIUs with support from E&S specialists/consultants, identify issues of SEA/SH associated with the investments. In case the PIUs, the implementation partners, service providers and the contractors are not equipped to handle complaints or provide relevant services to survivors of SEA/SH, they will refer them to SEA/SH service providers (could be local NGOs having such program and services) who will in turn use health facilities, law enforcement's gender unit or others, and other services for management of the issue. Grievances related to SEA/SH should also be channeled through the related service provider, if employed, else keeping the complainants' confidentiality.

In accordance with the SEA-SH Action Plan, the PIU and contractors will prepare a Code of Conduct (CoC) which will introduce specific behavioral requirements and prohibitions for the workers. All workers will be trained on this particular issue and will have to sign the CoC before deployment. This will specify a set of measures to prevent SEA/SH in the project and attend incidents of SEA/SH. Borrowers will plan to incorporate sensitization and/or training on SEA/SH as appropriate for different parties, including project actors, project-affected people and others involved in service delivery. Training is not a one-time requirement; rather, it is a continuing process throughout project implementation that is informed by the project activities and context. The Borrower will also identify a quality GBV service provider or mapping services, and the Bank will provide technical support when necessary.

The PIUs will keep records of all resolved and unresolved complaints and grievances (one file for each case record) and make them available for review as and when asked for by the Bank. The PIUs will also prepare periodic reports on the grievance resolution process and publish these on their respective official websites as admissible under the centralized national Grievance Redress System (GRS) of the Government of Bangladesh. SEA/SH related complaints and incidents will be recorded and handled with full confidentiality as per the consent of the complainants.

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

Communication & Awareness Raising on GRM.

The final processes and procedures for the GRM will be translated into local language (i.e., Bangla) and disseminated at all sub-project locations. These shall be made available (in both leaflet and poster format) to all sub-project locations with the staff on site and in Villages, Upazila, District and Municipality offices.

The worker GRM shall include indicators for number of grievances received, type of grievance, average resolution time, unresolved cases, SEA/SH-related referrals handled confidentially, retaliation allegations, and corrective actions. Contractors shall report grievance statistics monthly to the PIU while preserving confidentiality and survivor-centered handling of SEA/SH cases in line with the SEA/SH Action Plan.

11. CONTRACTOR MANAGEMENT

This section sets out contractor selection, contract provisions, and monitoring requirements for labor management, OHS, SEA/SH prevention, worker accommodation, subcontractor oversight, primary supplier screening, and corrective action.

11.1 Provision of LMP in Bidding Document

This LMP will be included in the general specification of the bidding documents. The preparation and implementation of site-specific Labor Management Plan by the contractor will be incorporated in the Bill of Quantities (BoQ) as a component of the general items of bidding document. Moreover, the LMP can be incorporated in the "Scope of Works and Particular Requirement" under the section "Work Requirements" along with Environmental.

Bidding documents and contracts shall make labor influx mitigation measures contractually binding and budgeted. Contractors shall not commence relevant civil works until the site-specific C-ESMP, Labor Influx Management Plan, Workers' Camp Management Plan where applicable, OHS Plan, Traffic Management Plan, SEA/SH Action Plan, Code of Conduct, worker GRM, and community liaison arrangements have been reviewed and approved by the PIU and supervision consultant. Contracts shall include remedies for non-compliance, including corrective action notices, withholding of payments, removal of personnel, use of performance securities where applicable, suspension of activities, or contract termination for serious or repeated non-compliance.

11.2 Monitoring and Evaluation

There is a need to monitor contractor and subcontractor performance through monthly inspections, document reviews, worker interviews, camp inspections, OHS audits, incident investigations, community consultations, GRM review, and corrective action tracking. For high-risk marine works, inspections may be more frequent and shall include dredging operations, diving activities, vessel movements, lifting operations, emergency preparedness, worker accommodation, transport arrangements, and worker-community interaction controls. Contractors shall submit monthly labor and OHS reports covering workforce numbers, worker categories, workers recruited locally and from outside the project area, planned worker influx and demobilization, subcontractors, training, worker grievances, community grievances related to labor influx, SEA/SH training and CoC signing, incidents and near misses, lost time injuries, PPE compliance, toolbox talks, labor inspections, wage payment status, accommodation conditions, recruitment channels, public service pressures, traffic incidents, and corrective actions. Key performance indicators shall include LTIFR, TRIR, near-miss reporting, PPE compliance, training completion, toolbox talk frequency, labor inspection frequency, grievance resolution time, SEA/SH referral functionality, local recruitment share, camp inspection results, communicable disease prevention activities, traffic incidents, and closure of corrective actions. These should all be documented as part of the requirements in the ESMP.

For labor influx risk, the PIU will supplement supervision consultant oversight with independent environmental and social monitoring or third-party monitoring. Monitoring results shall be used for adaptive management, including revision of the C-ESMP, Labor Influx Management Plan, Workers' Camp Management Plan, traffic measures, community engagement approach, or contractor corrective action plan where new or recurring risks are identified. A sample monitoring framework can be found in Annex 4 of this document.

12. PRIMARY SUPPLY WORKERS

Primary suppliers providing core materials and equipment for the project, including stone/boulders, sand, cement, steel, fuel, marine equipment, dredging support materials, and other critical inputs, shall be screened for risks related to child labor, forced labor, serious safety incidents, wage non-payment, recruitment fees, and unsafe working conditions. Contractors shall maintain a register of primary suppliers and provide the PIU with evidence of supplier due diligence, including licenses, labor compliance records where available, OHS performance, and corrective action status. If significant risks or non-compliance are identified, the PIU shall require corrective actions, increased monitoring, suspension of procurement from the supplier, or replacement of the supplier where necessary.

ANNEX I: Sample Labor Code of Conduct (CoC) covering the SEA/SH related risks

Introduction

The Code of Conduct defines labor standards that aim to achieve decent and humane working conditions. The Code's standards are based on national law and accepted good labor practices. Firms/contractors affiliated with the installation project are expected to comply with all relevant and applicable laws and regulations of the country in which workers are employed and to implement the Workplace Code in their applicable facilities. When differences or conflicts in standards arise, affiliated companies are expected to apply the highest standard. The CoC should be easily understood and shall be written in local language that the workers can read (generally Bangla) signed by each worker to indicate that they have:

- Received a copy of the CoC as part of their contract;
- Had the CoC explained to them as part of the induction process;
- Acknowledged that adherence to this CoC is a mandatory condition of employment;
- Understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.
- A copy of the CoC shall be displayed in a location easily accessible to the community and project-affected people. It shall be provided in Bangla.

The PIU monitors compliance with the Workplace Code by carefully examining adherence to the Compliance Benchmarks and the Principles of Monitoring. Compliance Benchmarks identify specific requirements for meeting each Code standard, while the Principles of Monitoring guide the assessment of compliance. The PIU requires affiliated companies/contractors/subcontractors/suppliers engaged in the Project require to develop/improve Code standards and to develop sustainable mechanisms to ensure ongoing compliance. The PIU provides a model of collaboration, accountability, and transparency and serves as a catalyst for positive change in workplace conditions. As an organization that promotes continuous improvement, the PIU strives to establish best practices for respectful and ethical treatment of workers, and in promoting sustainable conditions through which workers earn fair wages in safe and healthy workplaces and issues related to gender-based violence, sexual exploitation and abuse, and sexual harassment are penalized.

Employment Relationship

Employers shall adopt and adhere to rules and conditions of employment that respect workers and at a minimum, safeguard their rights under national and international labor and social security laws and regulations.

Non-discrimination

No person shall be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination, or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group, or ethnic origin.

Harassment or Abuse

Every worker shall be treated with respect and dignity. No worker shall be subject to any physical, sexual, psychological, or verbal harassment or abuse.

Forced Labor

There shall be no use of forced labor, including bonded labor or other forms of forced labor.

Child Labor

No person shall be employed under the age of 18.

Health, Safety and Environment

Employers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employers' facilities. Employers shall adopt responsible measures to mitigate the negative impacts that the workplace has on the environment.

Hours of Work

Employers shall not require workers to work more than the regular and overtime hours allowed by the law of the country. The regular workweek shall not exceed 48 hours. Employers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Employers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 72 hours.

Compensation

Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income. Employers shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. Increases in minimum wages—as seen in Grade 7 workers, whose wage increased from Tk 3000 (approximately US$38) to Tk 5300 (approximately US$68), representing a 76.7 percent rise—highlight ongoing efforts to improve worker welfare. Where compensation does not meet workers' basic needs and provides some discretionary income, each employer shall work with the PIU to take appropriate actions that seek to progressively realize a level of compensation that does.

Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)

While all forms of violence against a community resident or a co-worker are forbidden, this code of conduct is particularly concerned with the prevention and reporting of sexual exploitation and abuse (SEA) and sexual harassment which constitute gross misconduct, are grounds for termination or other consequences related to employment and employment status[1]:

Definitions

Sexual Exploitation and Abuse (SEA): Is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

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

Sexual Harassment: Unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of sexual nature.

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

Consent is the choice behind a person's voluntary decision to do something. Consent for any sexual activity must be freely given, ok to withdraw, made with as much knowledge as possible, and specific to the situation. If agreement is obtained using threats, lies, coercion, or exploitation of power imbalance, it is not consent. Under this Code of Conduct consent cannot be given by anyone under the age of 18, regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of the child is not a defense.

There is no consent when agreement is obtained through:

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

While all forms of violence against a community resident or a co-worker are forbidden, this code of conduct is particularly concerned with the prevention and reporting of sexual exploitation and abuse (SEA) and sexual harassment which constitute gross misconduct, are grounds for termination or other consequences related to employment and employment status:

Individual signed commitment (to be translated in a language understood by the person signing):

I, _____, acknowledge that sexual exploitation and abuse (SEA) and sexual harassment, are prohibited. As an (employee/contractor) of (contracted agency / sub-contracted agency) in (country), I acknowledge that SEA and SH activities on the work site, the work site surroundings, at workers' camps, or the surrounding community constitute a violation of this Code of Conduct. I understand SEA and SH activities are grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit SEA and SH may be pursued if appropriate.

I agree that while working on the project I will:

- Treat all persons, including children (persons under the age of 18), with respect regardless of sex, race, color, language, religion, political or other opinion, national, ethnic or social origin, gender identity, sexual orientation, property, disability, birth or other status.
- Commit to creating an environment which prevents SEA and SH and promotes this code of conduct. In particular, I will seek to support the systems which maintain this environment.
- Not participate in SEA and SH as defined by this Code of Conduct and as defined under (country) law (and other local law, where applicable).
- Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.

- Not participate in sexual contact or activity with anyone under the age of 18. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense. I will not participate in actions intended to build a relationship with a minor that will lead to sexual activity.
- Not solicit/engage in sexual favors in exchange for anything as described above.
- Unless there is the full consent by all parties involved, recognizing that a child is unable to give consent and a child is anyone under the age of 18, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered "non-consensual" under this Code.

I commit to:

Adhere to the provisions of this code of conduct both on and off the project site.

Attend and actively partake in training courses related to preventing SEA and SH as requested by my employer.

If I am aware of or suspect SEA and SH, at the project site or surrounding community, I understand that I am encouraged to report it to the Grievance Reporting Mechanism (GRM) or to my manager. The safety, consent, and consequences for the person who has suffered the abuse will be part of my consideration when reporting. I understand that I will be expected to maintain confidentiality on any matters related to the incident to protect the privacy and security of all those involved.

Sanctions: I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action which could include:

- Informal warning or formal warning
- Additional training
- Loss of salary
- Suspension of employment (with or without payment of salary)
- Termination of employment
- Report to the police or other authorities as warranted

I understand that it is my responsibility to adhere to this code of conduct. That I will avoid actions or behaviors that could be construed as SEA and SH. Any such actions will be a breach of this Individual Code of Conduct. I acknowledge that I have read the Individual Code of Conduct, do agree to comply with the standards contained in this document, and understand my roles and responsibilities to prevent and potentially report SEA and SHA issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

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

- A project worker makes inappropriate sexual remarks or threats to a fellow female project worker
- A project worker initiates unwanted physical touch towards a fellow female project worker
- A project worker tells women in the community that he can get them jobs related to the work site (cooking and cleaning) in exchange for sex.
- A worker that is connecting electricity input to households says that he can connect women-headed households to the grid in exchange for sex.
- A project worker gets drunk and rapes a local woman.
- A project worker denies passage of a woman through the site that he is working on unless she performs a sexual favor.
- A manager tells a woman applying for a job that he will only hire her if she has sex with him.
- A worker begins a friendship with a 17-year-old girl who walks to and from school on the road where Project-related work is taking place. He gives her rides to school. He tells her that he loves her. They have sex.

ANNEX 1: SAMPLE CODE OF CONDUCT (IN BENGALI)

আচরণবিধি

মুখবন্ধ

এই আচরণবিধির মূল উদ্দেশ্য হলো শ্রমের মানদণ্ড নির্ধারণের মাধ্যমে একটি উপযুক্ত ও মানসম্মত কর্মপরিবেশ প্রতিষ্ঠা করা। দেশের প্রচলিত শ্রম আইন এবং সর্বোত্তম শ্রমচর্চার ওপর ভিত্তি করে এই মানদণ্ডসমূহ প্রণয়ন করা হয়েছে। প্রকল্পের কাজ বা বাস্তবায়নের সাথে সম্পৃক্ত সকল সংস্থা ও ঠিকাদার প্রতিষ্ঠান দেশের প্রযোজ্য সকল আইন ও প্রবিধান মেনে চলতে বাধ্য থাকবে। পাশাপাশি, তাদের অধীনস্থ কর্মীরা যেন প্রযোজ্য সুবিধাদি লাভ করতে পারেন, সে অনুযায়ী কর্মক্ষেত্রের নিয়মাবলী প্রয়োগ করবে। নির্ধারিত মানদণ্ডে কোনো তফাত বা দ্বন্দ্ব দেখা দিলে সংশ্লিষ্ট প্রতিষ্ঠানসমূহ সর্বোত্তম মানটি প্রয়োগ করবে বলে প্রত্যাশা করা হচ্ছে।

বাস্তবায়নকারী সংস্থা তাদের কমপ্লায়েন্স বেঞ্চমার্ক এবং পরিবীক্ষণ নীতিমালার প্রতি আনুগত্য পরীক্ষার মাধ্যমে কর্মক্ষেত্রের নিয়মাবলী অনুসরণ পর্যবেক্ষণ করে থাকে। কমপ্লায়েন্স বেঞ্চমার্ক প্রতিটি নিয়মের মান পূরণের জন্য সুনির্দিষ্ট শর্তাবলী চিহ্নিত করে এবং পরিবীক্ষণ নীতিমালা অনুযায়ী তা মূল্যায়ন করা হয়। ক্রমাগত কমপ্লায়েন্স নিশ্চিতকরণ, নীতিমালার উন্নয়ন এবং একটি টেকসই পদ্ধতি গড়ার জন্য প্রকল্প বাস্তবায়ন ইউনিটের (PIU) সাথে সম্পৃক্ত সকল ঠিকাদার, উপ-ঠিকাদার ও সরবরাহকারীদের সক্রিয় ভূমিকা প্রয়োজন। প্রকল্প বাস্তবায়ন ইউনিট সহযোগিতা, জবাবদিহিতা ও স্বচ্ছতার একটি দৃষ্টান্ত স্থাপন করে, যা কর্মক্ষেত্রে ইতিবাচক পরিবর্তনের সহায়ক হিসেবে কাজ করে। একটি দায়িত্বশীল সংস্থা হিসেবে ধারাবাহিক সমৃদ্ধি নিশ্চিত করতে এবং সর্বোত্তম শ্রমচর্চা প্রতিষ্ঠায় প্রকল্প বাস্তবায়ন ইউনিট সর্বদা সচেষ্ট। এর মূল লক্ষ্য হলো কর্মীদের সাথে সম্মানজনক ও নৈতিক আচরণ বজায় রাখা, যাতে নিরাপদ ও স্বাস্থ্যকর পরিবেশে তারা ন্যায্য মজুরি লাভ করতে পারেন।

চাকরির শর্তাবলী নিয়োগকর্তারা কর্মীদের জন্য মর্যাদাপূর্ণ নিয়ম ও শর্তাবলী প্রয়োগ করবেন। এছাড়া, জাতীয় ও আন্তর্জাতিক শ্রম আইন এবং সামাজিক নিরাপত্তা নীতিমালার অধীনে কর্মীদের ন্যূনতম অধিকার রক্ষার ব্যবস্থা নিশ্চিত করতে হবে।

বৈষম্যহীনতা কর্মক্ষেত্রে নিয়োগ, ক্ষতিপূরণ, পদোন্নতি, শৃঙ্খলা রক্ষা, পদত্যাগ বা অবসরসহ কোনো ক্ষেত্রেই লিঙ্গ, জাতি, ধর্ম, বয়স, শারীরিক অক্ষমতা, যৌন পরিচিতি, জাতীয়তা, রাজনৈতিক মতামত, সামাজিক গোষ্ঠী বা জাতিগত পরিচয়ের ভিত্তিতে কোনো ধরনের বৈষম্য করা যাবে না।

হয়রানি ও নির্যাতন প্রতিরোধ প্রত্যেক শ্রমিককে পূর্ণ সম্মান ও মর্যাদার সাথে বিবেচনা করতে হবে। কোনো শ্রমিকের ওপর শারীরিক, যৌন, মনস্তাত্ত্বিক বা মৌখিক হয়রানি ও নির্যাতন সম্পূর্ণ নিষিদ্ধ।

জোরপূর্বক শ্রম নিষেধ কোনো প্রকার বন্ডেড শ্রম বা অন্যান্য বাধ্যতামূলক শ্রমসহ কোনো রূপ জোরপূর্বক শ্রম প্রয়োগ করা যাবে না।

শিশুশ্রম নিষেধ ১৮ বছর বয়সের নিচে কোনো ব্যক্তিকে কোনো ঝুকিপুর্ন কাজে নিযুক্ত করা যাবে না।

স্বাস্থ্য, নিরাপত্তা ও পরিবেশ প্রতিষ্ঠানের গাফিলতিজনিত দুর্ঘটনা এবং স্বাস্থ্যহানি প্রতিরোধে নিয়োগকর্তারা একটি নিরাপদ ও স্বাস্থ্যকর কর্মপরিবেশ নিশ্চিত করবেন। কর্মক্ষেত্রের দ্বারা পরিবেশের ওপর যাতে কোনো নেতিবাচক প্রভাব না পড়ে, সে জন্য দায়িত্বশীল ব্যবস্থা গ্রহণ করতে হবে।

কর্মঘণ্টা নিয়মিত কর্মঘণ্টা এবং প্রচলিত আইনের অতিরিক্ত কর্মঘণ্টার (ওভারটাইম) বাইরে কর্মীদের দিয়ে কাজ করানো যাবে না। সাপ্তাহিক নিয়মিত কর্মঘণ্টা কোনোভাবেই ৪৮ ঘণ্টার বেশি হবে না। প্রতি সাত দিনে কর্মীদের টানা ২৪ ঘণ্টার বিশ্রাম প্রদান করতে হবে। সকল অতিরিক্ত কাজ কর্মীদের স্বেচ্ছাসম্মতির ভিত্তিতে হতে হবে। নিয়োগকর্তারা অযৌক্তিকভাবে অতিরিক্ত সময় কাজের অনুরোধ করবেন না এবং অতিরিক্ত কর্মঘণ্টার মজুরি সাধারণ মজুরির দ্বিগুণের হারে প্রদান করতে হবে। জরুরি পরিস্থিতি ব্যতিরেকে, সপ্তাহে নিয়মিত ও অতিরিক্ত কর্মঘণ্টা মিলিয়ে মোট কাজ ৭২ ঘণ্টার বেশি হবে না।

ক্ষতিপূরণ ও মজুরি সাপ্তাহিক কাজের জন্য প্রতিটি শ্রমিকের উপযুক্ত ক্ষতিপূরণ বা মজুরি পাওয়ার অধিকার রয়েছে, যা তার মৌলিক চাহিদা মেটাতে এবং সঞ্চয়ের সুযোগ প্রদানে সক্ষম। নিয়োগকর্তাদের প্রচলিত আইন অনুযায়ী ন্যূনতম মজুরি বা উপযুক্ত প্রচলিত মজুরির মধ্যে যা সর্বোচ্চ, তা প্রদান করতে হবে। যেখানে বিদ্যমান মজুরি দিয়ে শ্রমিকের মৌলিক চাহিদা পূরণ হয় না, সেখানে নিয়োগকর্তাগণ পিআইইউ-এর (PIU) সাথে সমন্বয় করে ক্রমান্বয়ে মজুরির মান উন্নয়নের ব্যবস্থা নেবেন।

যৌন শোষণ, অপব্যবহার ও যৌন হয়রানি (SEAH) স্থানীয় বাসিন্দা বা সহকর্মীদের বিরুদ্ধে যেকোনো ধরনের সহিংসতা কঠোরভাবে নিষিদ্ধ। এই আচরণবিধি লঙ্ঘন করে যৌন শোষণ, অপব্যবহার বা যৌন হয়রানি করলে চাকরিচ্যুতকরণসহ অন্যান্য আইনি ব্যবস্থা গ্রহণ করা হবে।

ব্যক্তি/প্রতিষ্ঠান কর্তৃক স্বাক্ষরিত অঙ্গীকারনামা

আমি, ..., এই মর্মে অঙ্গীকার করছি যে, আমি যৌন শোষণ, অপব্যবহার এবং যৌন হয়রানি সম্পূর্ণ নিষিদ্ধ করার নীতিকে সমর্থন করি।

আমি (দেশের নাম: .....)-এ কার্যরত (ঠিকাদারি/উপ-ঠিকাদারি প্রতিষ্ঠানের নাম: .....)-এর একজন (শ্রমিক/ঠিকাদার) হিসেবে স্বীকার করছি যে—কর্মস্থলে, তার আশেপাশে, শ্রমিকদের আবাসে (ক্যাম্পে) কিংবা স্থানীয় জনগোষ্ঠীর মধ্যে যেকোনো ধরনের যৌন শোষণ, অপব্যবহার ও যৌন হয়রানিমূলক আচরণ এই আচরণবিধির স্পষ্ট লঙ্ঘন। আমি অবগত আছি যে, এসব কর্মকাণ্ডে জড়ালে কাজ থেকে বরখাস্ত, জরিমানা বা চাকরিচ্যুতি হতে পারে। ক্ষেত্রবিশেষে সংশ্লিষ্ট ব্যক্তিকে প্রচলিত আইনের আওতায় এনে বিচার ও শাস্তির মুখোমুখি করা হবে।

প্রকল্পে কর্মরত থাকাকালে আমি নিম্নে বর্ণিত বিষয়সমূহ মেনে চলতে সম্মত হচ্ছি:

- শিশুসহ সকল ব্যক্তির প্রতি (তাদের লিঙ্গ, জাতি, বর্ণ, ভাষা, ধর্ম, রাজনৈতিক বা অন্যান্য মতামত, সামাজিক পরিচয়, যৌন পরিচিতি বা সম্পত্তি নির্বিশেষে) সর্বদা সম্মানজনক আচরণ করব।
- যৌন শোষণ, অপব্যবহার ও যৌন হয়রানি প্রতিরোধে একটি সুরক্ষিত কর্মপরিবেশ গড়ে তুলতে সচেষ্ট থাকব এবং এই সংক্রান্ত বিধিমালা প্রচারে ভূমিকা রাখব।
- প্রচলিত আইন বা এই বিধিতে নিষিদ্ধ এমন কোনো যৌন শোষণ, অপব্যবহার ও যৌন হয়রানিমূলক কর্মকাণ্ডে লিপ্ত হব না।
- নারী, শিশু বা পুরুষদের প্রতি অসংবেদনশীল, অপমানজনক, অবমাননাকর, হয়রানিমূলক বা সামাজিকভাবে অনুপযুক্ত ভাষা ও আচরণ ব্যবহার থেকে বিরত থাকব।
- ১৮ বছরের কম বয়সী কোনো ব্যক্তির সাথে কোনো ধরনের যৌন কর্মকাণ্ডে লিপ্ত হব না। এ ক্ষেত্রে বয়সের ভুল ধারণা বা নাবালকের সম্মতিকে কোনো যুক্তি হিসেবে বিবেচনা করা হবে না।
- কোনো আর্থিক বা অনার্থিক সুবিধার বিনিময়ে যৌন সুবিধা গ্রহণের চেষ্টা করব না।
- সম্মতি থাকুক বা না থাকুক, ১৮ বছরের কম বয়সী কোনো স্থানীয় শিশুর সাথে কোনোরূপ যৌন সম্পর্কে লিপ্ত হব না। সুবিধা প্রদানের প্রতিশ্রুতি দিয়ে গঠিত যেকোনো সম্পর্ক আইনত অসম্পন্ন ও অবৈধ বলে গণ্য হবে।

আমি আরও অঙ্গীকার করছি যে:

- প্রকল্প এলাকা এবং এর বাইরে সর্বদা এই আচরণবিধির সকল ধারা মেনে চলব।
- নিয়োগকর্তার আহ্বানে যৌন শোষণ, অপব্যবহার ও যৌন হয়রানি প্রতিরোধ বিষয়ক প্রশিক্ষণসমূহে সক্রিয়ভাবে অংশ নেব।

প্রকল্প এলাকা বা আশেপাশে কোনো যৌন শোষণ, অপব্যবহার বা হয়রানির ঘটনা ঘটে থাকলে বা সেরূপ কোনো সন্দেহ হলে, তা অবিলম্বের 'অভিযোগ প্রতিকার ব্যবস্থা' (GRM) বা দায়িত্বপ্রাপ্ত ব্যবস্থাপকের নিকট রিপোর্ট করব। ভুক্তভোগীর সুরক্ষা, সম্মতি ও গোপনীয়তা রক্ষা করা আমার দায়িত্বের অংশ হবে। আমি আরও নিশ্চিত করছি যে, সংশ্লিষ্ট ঘটনার সাথে যুক্ত সকল তথ্যের গোপনীয়তা রক্ষা করব।

শাস্তিমূলক ব্যবস্থা: আমি অবগত আছি যে, আচরণবিধি লঙ্ঘন করলে আমার নিয়োগকর্তা নিম্নে বর্ণিত শাস্তিমূলক ব্যবস্থা গ্রহণ করতে পারেন:

- মৌখিক বা লিখিত সতর্কতা জারীকরণ
- অতিরিক্ত প্রশিক্ষণে প্রেরণ
- বেতন কর্তন বা স্থগিতকরণ
- সাময়িক বা স্থায়ী বরখাস্তকরণ (বেতনসহ/বেতন ছাড়া)
- আইন প্রয়োগকারী সংস্থার নিকট হস্তান্তর

আমি স্বীকার করছি যে, আমি এই আচরণবিধিটি পড়েছি, বুঝেছি এবং এতে বর্ণিত শর্তাবলী মেনে চলতে প্রতিশ্রুতিবদ্ধ।

স্বাক্ষর: _____

নাম: _____

পদবী: _____

তারিখ: _____

ANNEX 2: Certificate of Age and Fitness

Part-A of the Registered Medical Practitioner

<table>
<tr><td colspan="2">Certificate of Age and Fitness</td><td colspan="2">Certificate of Age and Fitness</td></tr>
<tr><td colspan="2">Serial No:</td><td colspan="2">Serial No:</td></tr>
<tr><td colspan="2">Date:</td><td colspan="2">Date:</td></tr>
<tr><td colspan="2">Name:</td><td colspan="2"></td></tr>
<tr><td colspan="2">Father’s Name:</td><td colspan="2" rowspan="8">It is being certified that (Name).....,

Father…… Mother……
Address…… has been examined by me. His identifying mark is.....He is willing to be employed in establishment, and it has been found in my examination that his age is…… and he is fit to be employed in establishment as an adult/adolescent worker.</td></tr>
<tr><td colspan="2">Mother’s Name:</td></tr>
<tr><td colspan="2">Sex:</td></tr>
<tr><td colspan="2">Permanent Address:</td></tr>
<tr><td colspan="2">Temporary/Mailing Address:</td></tr>
<tr><td colspan="2">Date of Birth according to Birth Certificate/ School Certificate:</td></tr>
<tr><td colspan="2">Physical Fitness:</td></tr>
<tr><td colspan="2">Identifying Marks:</td></tr>
<tr><td>Signature/Thumb Impression of the Concerned Person</td><td></td><td>Signature/Thumb Impression of the Concerned Person</td><td></td></tr>
<tr><td>Signature of the Registered Practitioner</td><td></td><td>Signature of the Registered Practitioner</td><td></td></tr>
</table>

ANNEX 3: WRITTEN PARTICULARS OF EMPLOYMENT

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

Notes:

(a) An employee is free to join a trade union or staff association, which is recognized by the undertaking. The address of the Trade Union or Staff Association is: …….

(b) The grievance procedure and disciplinary procedure in this undertaking are required to be followed when a grievance arises or disciplinary action needs to be taken……

(c) When any heading is inapplicable enter NIL.

……	……
Employer's signature	Witness
……	……
Employee's signature	Witness
……..	……
Date	Date

ANNEX 4: MONITORING FRAMEWORK FOR LMP IMPLEMENTATION

This monitoring framework provides the minimum arrangements for tracking implementation of the Labor Management Procedure throughout project preparation, construction, commissioning, and early operation. It is intended to support compliance with ESS2, national labor legislation, the project ESMP, contractor C-ESMPs, OHS Plans, Labor Influx Management Plans, Workers' Camp Management Plans, SEA/SH Action Plans, worker grievance mechanisms, and primary supplier due diligence requirements.

A4.1 Objectives and Scope

The objectives of the monitoring framework are to: (i) verify that labor and working conditions are managed in accordance with the LMP and contractual requirements; (ii) identify emerging risks early, including labor influx, OHS, SEA/SH, wage payment, recruitment, accommodation, and primary supplier risks; (iii) track implementation of corrective actions; and (iv) provide regular information to the PIU, supervision consultant, contractors, and the World Bank to support adaptive management.

The PIU has responsibility for the overall oversight of LMP implementation; review and approval of contractor plans; review of monthly reports; escalation of serious incidents; coordination with relevant authorities and service providers. Regular reporting should be carried out in line with the requirements of the ESCP which should include Quarterly LMP implementation summary; incident notifications; corrective action tracker.

In some cases, an Independent or third-party monitor, may be utilized to provide independent verification of high-risk labor influx, accommodation, OHS, SEA/SH referral functionality, primary supplier risk, and corrective action implementation.

A4.2 PIU Monitoring Matrix

Monitoring Area	Indicators	Source / Method	Frequency
Workforce composition and mobilization	Number of workers by category, sex, origin, skill level, contractor/subcontractor, and work location; planned mobilization and demobilization.	Worker registers, site access records, contractor reports.	Monthly; weekly during peak mobilization.
Employment terms, wages, and recruitment	Percentage of workers with written particulars; wage payment timeliness; overtime records; deductions; recruitment fee complaints; labor supplier disclosure.	Contracts, payroll, pay slips, worker interviews, labor supplier agreements.	Monthly.
Child labor and forced labor prevention	Age verification completed; no workers under 18; no document retention; no forced overtime; no debt bondage; no worker-paid recruitment fees.	NID or birth records, recruitment files, worker interviews, spot checks.	Before deployment; monthly; ad hoc spot checks.
Primarily ESMP related -	LTIFR, TRIR, fatalities, serious incidents, near misses, PPE compliance, toolbox talks, OHS	OHS logs, incident reports, inspection records, permits	Daily contractor checks; weekly inspections;

Monitoring Area	Indicators	Source / Method	Frequency
Occupational health and safety	training, lifting permits, diving permits, marine rescue readiness, emergency drills, climate-related OHS controls.	to work, drill reports, site observations.	monthly reporting; immediate incident reporting.
Labor influx and community interface	Local recruitment share; number of non-local workers; community complaints; pressure on services; traffic incidents; public communication on hiring; unmanaged job seeker risks.	Labor influx plan, community liaison logs, GRM records, traffic logs, stakeholder engagement records.	Monthly; more frequently during peak mobilization.
Worker accommodation	Occupancy levels; water, sanitation, lighting, ventilation, fire safety, security, food safety, waste management, gender-separated facilities, camp grievances, inspection findings.	Camp inspection checklists, water quality tests, grievance records, accommodation manager reports.	Weekly contractor checks; monthly PIU/supervision consultant inspection.
SEA/SH prevention and response	Code of Conduct signing; SEA/SH induction and refresher training; availability of confidential reporting channels; referral pathway functionality; SEA/SH-related grievances handled confidentially.	Training records, CoC register, SEA/SH action plan reports, confidential GRM logs without personal identifiers.	Monthly; immediate escalation for serious incidents under agreed protocol.
Worker grievance mechanism	Number and type of grievances; average resolution time; unresolved cases; retaliation allegations; worker awareness of GRM; corrective actions taken.	GRM database, worker interviews, notice boards, induction records.	Monthly.
Labor market screening	Bangladesh/Chattogram labor market screening completed before mobilization	Contractor labor market screening report; PIU/consultant review	Before mobilization; update if labor sourcing changes
Recruitment and labor suppliers	Labor supplier licenses/registration verified; no gate hiring; no worker-paid recruitment fees	Supplier licenses/registration records; recruitment records; worker interviews; contractor HR files	Before supplier engagement and worker onboarding; periodic spot checks
Worker identity and age	100% age verification completed before recruitment; no workers under 18	Worker roster; national ID or age-verification documents; onboarding records	Before recruitment and at each new intake
Contracts and wage payment	Percentage of workers with written contracts; wages paid on time; electronic or documented payroll maintained	Employment contracts; payroll records; bank/mobile payment records; worker interviews	Monthly

Monitoring Area	Indicators	Source / Method	Frequency
OHS Plan	OHS Plan approved before mobilization; monthly OHS performance reporting completed	Approved OHS Plan; contractor monthly OHS reports; supervision consultant review	Before mobilization; monthly reporting
Marine and climate OHS	Cyclone, tidal surge, monsoon, lightning, heat-stress, sea-state, and work-suspension thresholds monitored	Weather and sea-state logs; work-permit records; toolbox talks; suspension/resumption records	Daily during relevant works; before and during high-risk activities
Incident indicators	LTIFR, TRIR, near misses, serious incidents, fatalities, and corrective actions tracked	Incident register; investigation reports; corrective action records; monthly OHS reports	Monthly; immediately for serious incidents and fatalities
Worker accommodation	Camp inspections completed; Fire Service/local health approvals obtained where relevant; wastewater and vector-control checks conducted	Camp inspection checklists; approval certificates; wastewater/vector-control records; photos/site verification	Before occupancy; monthly inspections
SEA/SH	CoC signed by workers; SEA/SH training completed; confidential referral tracking maintained using non-identifying data	Signed Codes of Conduct; training attendance sheets; SEA/SH service provider/referral logs using non-identifying data	At induction; refresher training periodically; referral tracking ongoing
Worker representation	Worker-management meetings held; worker representatives identified; non-retaliation monitored	Meeting minutes; worker representative records; worker interviews; grievance/retaliation monitoring records	Monthly
GRM	Number and type of grievances recorded; resolution time tracked; unresolved cases and retaliation allegations monitored	GRM register; grievance resolution records; worker interviews; escalation logs	Monthly
Institutional coordination	Section 5 matrix updated; drills conducted; agencies contacted; response timelines tested	Updated coordination matrix; drill records; agency correspondence; response-time logs	Monthly update; drills as scheduled or after coordination changes
Independent monitoring	Independent labor/OHS audits and surprise inspections conducted for high-risk works	Independent audit reports; surprise inspection notes; corrective action follow-up records	Semi-annually or risk-based; surprise inspections for high-risk works
Corrective action	Corrective action register updated monthly; overdue actions escalated	Corrective action register; evidence of closure; escalation emails/minutes	Monthly; overdue actions escalated as needed

Monitoring Area	Indicators	Source / Method	Frequency
Primary suppliers	Supplier register; screening completed; child labor, forced labor, serious OHS, wage payment, recruitment fee, and labor compliance risks; corrective action status.	Supplier due diligence records, licenses, audits, site visits, contractor procurement records.	Before procurement; quarterly; ad hoc for high-risk suppliers.

A4.3 Corrective Action Tracking

All non-compliances shall be recorded in a corrective action tracker that identifies the issue, risk level, responsible party, agreed action, deadline, verification method, status, and closure date. Repeated or serious non-compliance may trigger contractual remedies, including written warnings, corrective action notices, withholding of payments, suspension of works, removal of personnel, replacement of subcontractors or suppliers, or contract termination in accordance with contract provisions.

Mandatory PIU monitoring requirements for labor compliance. The PIU Monitoring Matrix shall require systematic verification of LMP implementation through unbiased labor audits, unannounced inspections, DIFE involvement where relevant, reviews of third-party labor compliance, contractor performance monitoring against labor and OHS KPIs, and defined repercussions for persistent non-compliance. The TOR and review of independent audit reports must receive a no objection from the World Bank prior to finalization. All reporting on labor compliance will be submitted to the World Bank as part of the agreed regular reporting. These requirements shall apply to contractors, subcontractors, labor suppliers, worker accommodation providers, and primary suppliers where labor risks are material.

Monitoring Area	Indicators	Source / Method	Frequency / Responsibility
Independent and unbiased labor audits	Independent audit completed; audit covers employment terms, wages, working hours, recruitment fees, age verification, forced labor, worker GRM, accommodation, subcontractors, labor suppliers, and primary suppliers; corrective actions recorded and closed.	Third-party labor audit reports; worker interviews; payroll, roster, contract, grievance, and training records; accommodation inspection records.	At least annually and more frequently for high-risk contractors; PIU to commission or require audits with supervision consultant follow-up.
Unannounced inspections	Unannounced site and accommodation inspections conducted; high-risk work fronts checked; non-compliance notices issued where needed; immediate risks corrected before work continues.	Spot inspections; worker and supervisor interviews; site observations; PPE, OHS, wage, worker register, and accommodation checks.	Monthly at minimum during peak works and whenever serious risks, grievances, incidents, or repeated non-compliance are identified; PIU and supervision consultant.
DIFE involvement and	DIFE engaged for relevant labor and OHS compliance matters; inspection	DIFE correspondence, inspection reports,	As required by law, following serious incidents, and

regulatory coordination	findings tracked; accident reporting and inspection-readiness requirements met; regulatory corrective actions implemented.	meeting minutes, accident notifications, contractor compliance evidence, and corrective action tracker.	periodically for high-risk work areas; PIU to coordinate with DIFE and contractor.
Third-party labor compliance reviews	Subcontractors, labor suppliers, accommodation providers, and primary suppliers screened and monitored; licenses, registrations, contracts, worker records, wage practices, recruitment channels, and OHS compliance verified.	Supplier and subcontractor due diligence records; labor supplier documentation; payroll samples; worker interviews; site and accommodation inspections.	Before approval or mobilization, quarterly thereafter, and whenever a new subcontractor, labor supplier, or high-risk primary supplier is introduced; contractor with PIU and supervision consultant oversight.
Contractor performance against labor and OHS KPIs	KPI dashboard maintained, including wage payment timeliness, worker contract coverage, training completion, Code of Conduct signing, GRM accessibility and resolution, SEA/SH training, incident rates, LTIFR/TRIR, PPE compliance, accommodation inspection scores, labor supplier compliance, certification validity for specialized workers, and closure of corrective actions.	Monthly contractor reports; KPI dashboard; supervision consultant verification; audits; site inspection records; GRM and incident logs.	Monthly reporting and quarterly PIU performance review; more frequent review for high-risk contractors or poor performers.
Repercussions for persistent non-compliance	Persistent, repeated, willful, or high-risk non-compliance escalated; contractual remedies applied; contractor ratings affected; unresolved issues linked to payment, mobilization, and continuation of works.	Non-compliance notices; corrective action tracker; payment certificates; contract management records; incident and audit findings; PIU decision records.	Triggered by overdue corrective actions, repeated findings, serious incidents, falsified records, worker rights violations, or unsafe deployment; PIU to enforce with supervision consultant recommendation.

These should cover the following issues to ensure adequate implementation of this LMP. No ESS2 gap-filling measure shall be treated as informational only; each shall be translated into a monitorable action with a defined indicator, evidence source, monitoring method, frequency, responsible party, reporting requirement, corrective action trigger, and closure verification requirement.

The PIU shall maintain an ESS2 commitments register that cross-references each gap-filling measure to the relevant LMP section, bidding or contract clause, contractor plan, monitoring matrix row, evidence source, responsible party, deadline, status, and corrective action record. The supervision consultant shall verify the completeness of this

mapping before bid finalization, before contractor mobilization, during monthly supervision, and during quarterly PIU management reviews. Any gap-filling measure not reflected in the PIU Monitoring Matrix shall be treated as an implementation gap requiring immediate update of Annex 4 and the corrective action tracker. At minimum, the PIU shall explicitly track and report separately on the following:

Monitoring Area	**Indicators**	**Source / Method**	**Frequency / Responsibility**
LMP preparation, disclosure, implementation, and updating	Project-specific LMP prepared, disclosed, included in the POM, bidding documents, technical specifications, BOQs where applicable, and contracts; LMP reviewed and updated when project scope, labor risks, contractor arrangements, or applicable requirements change.	Approved LMP; disclosure records; POM; bidding and contract documents; PIU ESS2 commitments register; supervision consultant review; Bank clearance records where applicable.	Before project implementation and bid finalization; before contractor mobilization; updated as needed and reviewed quarterly. PIU responsible, with supervision consultant verification.
Contractor Labor Management Plans and pre-mobilization approvals	Contractors prepare site-specific Labor Management Plans, OHS Plans, Labor Influx Management Plans, Workers' Camp Management Plans where applicable, SEA/SH Action Plans, worker GRM procedures, and Codes of Conduct; plans approved before mobilization and implemented on site.	Contractor submissions; PIU and supervision consultant approval records; mobilization checklist; site inspection reports; training and induction records; corrective action tracker.	Before mobilization; monthly implementation monitoring; updated after material changes, incidents, audits, or recurring non-compliance. Contractor prepares; PIU and supervision consultant approve and monitor.
Child labor prohibition and age verification	No worker under 18 engaged by the project, contractors, subcontractors, labor suppliers, or primary suppliers; age verification completed before hiring and records maintained; suspected child labor cases immediately removed from work and addressed through a corrective action process.	Worker registry; age documents; HR files; induction records; labor supplier records; site inspections; worker interviews; audit findings; corrective action records.	Before hiring and site access; verified monthly and during unannounced inspections. Contractor and labor suppliers responsible; PIU and supervision consultant verify.
Forced labor, trafficking, recruitment fee, and	No forced labor, trafficked persons, bonded labor, retention of identity documents, worker-paid	Employment contracts; recruitment records; labor supplier due diligence; payment and deduction	Before engagement of labor suppliers and workers; monthly monitoring; immediate review after

Monitoring Area	Indicators	Source / Method	Frequency / Responsibility
document-retention controls	recruitment fees, coercive deductions, or restrictions on worker movement; recruitment and employment practices documented and corrective actions implemented where risks are identified.	records; passport or identity document checks; worker interviews; grievance logs; audit reports.	grievances, audits, or suspected cases. Contractor responsible; PIU and supervision consultant monitor and escalate serious cases.
Non-discrimination and equal opportunity	Recruitment, assignment, training, wages, benefits, promotion, discipline, termination, and grievance access are free from discrimination based on sex, disability, ethnicity, religion, nationality, migrant status, language, age where legally relevant, or other personal characteristics; diversity and equal opportunity measures reported as project KPIs.	Recruitment and HR records; wage and benefits records; training attendance; worker interviews; grievance records; contractor KPI reports; audit findings.	Monthly contractor reporting and quarterly PIU review; verified during site inspections and labor audits. Contractor responsible; PIU and supervision consultant verify.
SEA/SH prevention and confidential response	SEA/SH Action Plan implemented; Codes of Conduct signed and explained; workers trained; confidential reporting channels and survivor-centered referral pathways operational; SEA/SH incidents reported in line with project procedures while maintaining confidentiality.	SEA/SH Action Plan; signed Codes of Conduct; induction and refresher training records; referral pathway records; confidential GRM logs; service provider coordination records; supervision reports.	Before mobilization; induction before deployment; refresher training at least quarterly and after incidents; monthly reporting. Contractor implements; PIU SEA/SH focal point and supervision consultant monitor.
Written employment terms	All project workers receive written employment particulars or contracts in a language they understand before deployment, covering job title, wage rate, payment interval, working hours, overtime, leave, benefits, deductions, notice, disciplinary rules, Code of	Signed contracts or written employment particulars; worker acknowledgments; HR files; worker interviews; induction records; labor supplier records.	Before worker deployment and whenever employment terms change; verified monthly. Contractor and labor suppliers responsible; PIU and supervision consultant verify.

Monitoring Area	Indicators	Source / Method	Frequency / Responsibility
	Conduct, GRM access, and OHS obligations.		
Wage payment, pay slips, deductions, and overtime controls	Wages paid on time and documented; pay slips or verifiable electronic payments issued; overtime recorded and paid; unlawful deductions, wage arrears, and recruitment fee recovery prohibited; contractor payments may be withheld until corrective action is completed.	Payroll records; pay slips; bank or mobile payment records; timesheets; overtime approvals; worker interviews; grievance logs; payment certificates; corrective action tracker.	Monthly payroll review; immediate review following wage-related grievances or audit findings. Contractor responsible; PIU and supervision consultant verify before payment certification where relevant.
Working hours, rest, leave, and fatigue management	Working hours, overtime, weekly rest, annual leave, sick leave, maternity leave, and statutory benefits comply with national law and ESS2; fatigue controls applied for marine, port, shift, night, and peak-period work.	Timesheets; shift rosters; leave records; overtime records; fatigue management procedures; OHS reports; worker interviews; incident records.	Monthly monitoring and more frequent checks during peak labor, marine, shift, or night work. Contractor responsible; supervision consultant and PIU verify.
Termination, demobilization, and severance compliance	Workers receive written notice of termination and all outstanding wages, benefits, severance, and other entitlements in accordance with national law and employment terms; demobilization records maintained.	Termination notices; final settlement records; payroll and benefits records; demobilization lists; worker acknowledgments; grievance logs; worker interviews.	At each demobilization or termination event; reviewed monthly during demobilization periods. Contractor responsible; PIU and supervision consultant verify.
Worker facilities, accommodation, sanitation, fire safety, and security	Safe, accessible, gender-separated, well-lit, hygienic, and maintained toilets, washing areas, drinking water points, rest areas, changing facilities, and accommodation are provided where applicable; privacy and security measures for women workers and	Site and camp inspection checklists; accommodation management plans; photos; maintenance logs; fire safety records; water and sanitation records; worker interviews; grievance logs.	Before occupation of facilities; weekly contractor checks; monthly PIU and supervision consultant inspections; immediate follow-up after complaints or incidents.

Monitoring Area	Indicators	Source / Method	Frequency / Responsibility
	workers with disabilities are in place.		
OHS compliance with WBG EHS Guidelines and GIIP	OHS Plans implemented in line with national law, WBG EHS Guidelines, GIIP, and project-specific coastal, marine, port, emergency, and high-risk work requirements; incidents reported, investigated, and corrective actions closed.	OHS Plans; job hazard analyses; permits to work; training records; PPE records; toolbox talks; inspection reports; incident and near-miss logs; emergency drill records; corrective action tracker.	Daily contractor supervision; weekly OHS inspections; monthly PIU and supervision consultant review; immediate reporting and investigation of incidents. Contractor responsible; PIU and supervision consultant monitor.
Protection of women workers and workers with disabilities	Maternity protections, non-discrimination, safe transport where relevant, gender-separated facilities, safe accommodation, SEA/SH prevention, confidential reporting, reasonable accommodation where feasible, accessible facilities and grievance channels, and safe task allocation are implemented.	HR records; facility inspection records; transport and accommodation records; SEA/SH training records; worker interviews; grievance logs; reasonable accommodation records where applicable.	Monthly monitoring and quarterly PIU review; immediate review after related grievances or site changes. Contractor responsible; PIU and supervision consultant verify.
Migrant and foreign worker protections	Domestic migrant and foreign workers are lawfully recruited and employed; work permits obtained where required; no worker-paid recruitment fees or document retention; employment terms, OHS training, GRM access, and awareness materials provided in languages workers understand.	Recruitment records; work permits where applicable; labor supplier due diligence; contracts; identity document checks; language-appropriate materials; training records; worker interviews; grievance logs.	Before recruitment and deployment; monthly monitoring; additional checks when new labor suppliers or migrant worker groups are engaged. Contractor and labor suppliers responsible; PIU and supervision consultant verify.
Contractor, subcontractor, labor supplier, and	All contractors, subcontractors, labor suppliers, and primary suppliers are disclosed, screened, contractually bound to applicable LMP and ESS2	Contractor and supplier registers; contracts and subcontracts; due diligence records; monthly labor reports; audit reports; site	Before contract award or engagement; monthly during implementation; quarterly PIU review. Contractor reports; PIU and

Monitoring Area	Indicators	Source / Method	Frequency / Responsibility
primary supplier compliance	requirements, and monitored; primary supply reporting included in regular project reporting.	inspections; supplier declarations; corrective action records.	supervision consultant verify and conduct due diligence.
Worker representation, grievance access, non-retaliation, multilingual awareness, and labor-management engagement	Worker representatives selected or elected transparently where appropriate; confidential and private grievance channels are available; retaliation is prohibited and addressed as serious non-compliance; multilingual awareness programs delivered; labor-management meetings held and actions tracked.	Representative election or selection records; GRM procedures and logs; sealed box, hotline, or digital channel records; non-retaliation commitments; awareness materials; training attendance; meeting minutes; worker interviews; corrective action tracker.	Representative arrangements established before peak construction and reviewed monthly; labor-management meetings at least monthly and more frequently for high-risk works, serious incidents, repeated grievances, or accommodation concerns. Contractor implements; PIU and supervision consultant verify.
Implementation capacity, interagency coordination, audits, and corrective action closure	PIU and contractors designate qualified labor, OHS, camp management, SEA/SH, and community liaison focal points; coordination arrangements with CPA, DIFE, MoLE, DoE, Coast Guard, Navy, Fire Service and Civil Defence, local government, law enforcement, health providers, and SEA/SH service providers are operational; audits, inspections, KPIs, and corrective actions are tracked to closure.	Organizational charts; focal point appointment letters; institutional coordination and emergency response matrix; meeting minutes; drill records; audit reports; unannounced inspection reports; KPI reports; non-compliance notices; corrective action tracker.	Capacity arrangements confirmed before implementation and mobilization; coordination reviewed quarterly; audits and unannounced inspections as planned or risk-based; corrective actions reviewed monthly until closure. PIU leads; supervision consultant verifies; contractors implement actions.

A4.4 Adaptive Management

Monitoring results shall be reviewed by the PIU and supervision consultant at least monthly during construction and quarterly during lower-risk periods. Where monitoring identifies new, repeated, or escalating risks, the PIU shall require updates to contractor plans, additional mitigation measures, enhanced supervision, targeted worker or community consultations, additional training, or third-party monitoring. The monitoring framework shall be updated as needed to reflect detailed design, contractor mobilization, changes in workforce profile, incident trends, or lessons learned during implementation.