

**FEDERAL GOVERNMENT OF SOMALIA**



**MINISTRY OF LABOUR AND SOCIAL AFFAIRS**

**PROJECT:**

**BUILDING OPPORTUNITIES AND OUTCOMES IN SOCIAL  
PROTECTION AND YOUTH EMPLOYMENT IN SOMALIA (BOOST-  
YOU) PROJECT (P507443)**

**LABOR MANAGEMENT PROCEDURES (LMP)**

**DECEMBER 2025**

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## Abbreviations and Acronyms

CoC	Code of Conduct
ESF	Environmental and Social Framework
ESS	Environmental and Social Standards
ESS	Environmental and Social Standard
ESCP	Environmental and Social Commitment Plan
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
HR	Human Resources
ILO	International Labour Organization
LMP	Labour Management Procedures
MoECHE	Ministry of Education, Culture and Higher Education
MoLSA	Ministry of Labour and Social Affairs
MoH	Ministry of Health
M&E	Monitoring and Evaluation
OHS	Occupational Health and Safety
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SMP	Social Management Plan
SRAMP	Security Risk Assessment and Management Plan
ToR	Terms of Reference
Union	Workers' Union (collective labour organization)

## 1.0 INTRODUCTION

The Labour Management Procedures (LMP) has been developed to manage labour-related risks under the BOOST YOU Project, implemented by MOLSA, and funded by the World Bank. The LMP outlines the project's approach to aligning with Somalia's national labour requirements and the World Bank's Environmental and Social Framework (ESF) objectives. Specifically, it addresses the requirements of Environmental and Social Standard 2 (ESS2): Labour and Working Conditions, and Environmental and Social Standard 4 (ESS4): Community Health and Safety. The LMP complements the project's Social Management Plan (SMP) by providing detailed procedures for managing labour-related issues identified in the SMP. It has been developed following international best practices to ensure the project addresses labour-related risks and promotes the well-being of workers throughout its implementation.

The BOOST YOU project aims to support the poor and most vulnerable of the population by providing targeted interventions to improve their resilience for better jobs tomorrow and provide job opportunities now by addressing key barriers to better income-generating opportunities. The components are (i) connecting youths and women to better jobs today (ii) investing in people for better jobs tomorrow and (iii) Adaptive Social Protection Systems and Project Management. The proposed project will build on the results achieved and lessons learned from the design and implementation experience of the Shock Responsive Safety Net for Human Capital Project.

### 1.1 Project Components

The BOOST-YOU project components include.

#### 1.1.1 Component 1: Connecting Youth and Women to Better Jobs Today

This component supports approximately **168,000 urban youth** (at least 60% women and 5% persons with disabilities) with wage employment placements and entrepreneurship support. It includes two pathways: (a) **Wage Employment**, facilitating on-the-job apprenticeships with master crafts persons in high-demand trades, along with life-skills training and job placement support; and (b) **Self-Employment**, providing business skills training, startup grants, mentorship, and financial literacy support to help vulnerable entrepreneurs launch or expand small enterprises. Women's economic inclusion is a core focus – tailored packages (training, grants, mentoring, and financial literacy support) address the gender gap in employment, as female labor force participation is as low as 14% in Somalia's urban areas. The total allocation for Component 1 is US\$ 28.5 million, covering all activities and reaching the targeted beneficiaries. Gender inclusion is central to the component's design. Targeted interventions such as tailored training, access to finance, financial literacy programs, and dedicated mentoring seek to address structural barriers that limit women's participation in the labor force. This approach aligns with the **World Bank's**

Gender Strategy (FY23–30), emphasizing economic empowerment and closing gender gaps in access to jobs and productive assets.

### 1.1.2 Component 2: Investing in People for Better Jobs Tomorrow

This component enhances the human capital and climate resilience of poor and vulnerable households through targeted cash transfers, laying the foundation for a more productive and resilient future workforce. It is aligned with the World Bank Social Protection and Jobs (SPJ) Global Practice and the Climate Change Action Plan (2021–2025), emphasizing adaptive social protection and inclusive human capital development. It has three subcomponents: (2.1) Unconditional Cash Transfers to chronically poor and climate-vulnerable households to support basic needs and prevent negative coping (with priority to female-headed households for receiving the cash); (2.2) Human Capital Co-Responsibility Cash Transfers, providing cash to 30,000 pregnant women and mothers of young children conditional on utilization of health services, plus a pilot supporting 5,000 children's primary education with attendance requirements; and (2.3) Shock Responsive Cash Transfers, an emergency fund to scale up assistance in response to droughts, floods, or other shocks, helping families avoid harmful coping strategies during crises. These transfers are geographically concentrated around schools and health centers in areas of high climate vulnerability, linking social assistance with improvements in health, nutrition, and education outcomes. Beneficiaries of cash transfers will also be linked to skills training opportunities under complementary programs to reinforce long-term employability.

The component comprises three subcomponents:

**Subcomponent 2.1- Unconditional Cash Transfers** for chronically poor and climate-vulnerable households to meet basic consumption needs and reduce negative coping strategies, with priority given to female-headed households.

**Subcomponent 2.2 Human Capital Co-Responsibility Cash Transfers**, providing support to 30,000 pregnant women and mothers of young children conditioned on the use of essential health and nutrition services, and piloting education-linked transfers for 5,000 primary school children tied to school attendance.

**Subcomponent 2.3 Shock-Responsive Cash Transfers**, an emergency window designed to scale up assistance during climate-induced crises such as droughts or floods, enabling rapid and adaptive responses to shocks.

All transfers are digitally delivered using biometric systems to promote transparency, reduce leakage, and safeguard beneficiary data. Implementation will adhere to World Bank Environmental and Social Standards (ESS1, ESS2, and ESS10), ensuring inclusive targeting, equitable access, and stakeholder participation. Beneficiaries will also be linked to skills development and livelihood programs to reinforce long-term employability and income stability.

Continuous monitoring and evaluation (M&E) will assess progress on income security, education, nutrition, and climate resilience indicators. A functional Grievance Redress Mechanism (GRM) will ensure accountability, timely feedback, and transparent resolution of complaints

### 1.1.3 Component 3: Adaptive Social Protection Systems and Project Management

Component 3 of the BOOST-YOU Project focuses on strengthening Somalia's institutional systems, policies, and capacities for effective and sustainable social protection delivery. Aligned with the World Bank's Environmental and Social Framework (ESS1 and ESS10), it emphasizes transparency, inclusion, and accountability. Key priorities include establishing a Unified Social Registry for efficient targeting, developing adaptive mechanisms for crisis response, and conducting a National Socio-Economic Survey to inform data-driven policy. The component also reinforces institutional capacity at both federal and state levels, ensuring robust fiduciary management, evidence-based monitoring, and social accountability mechanisms such as grievance redress systems and participatory monitoring.

BOOST-YOU targets unemployed and underemployed youth (especially women), as well as poor and vulnerable households including IDPs, minority clans, persons with disabilities, and female-headed families to ensure equitable access to benefits. The Ministry of Labour and Social Affairs (MoLSA) leads project implementation, coordinating with Federal Member States, UNICEF, WFP, and national NGOs to deliver cash transfers, manage grievances, and build institutional capacity. Through these partnerships, the project promotes community participation, transparency, and resilience in Somalia's evolving social protection system.

## 1.2 Purpose and Scope of the LMP

The Labour Management Procedures (LMP) is designed to identify, assess, and manage labour-related risks throughout the project lifecycle, ensuring compliance with national legislation and World Bank Environmental and Social Framework (ESF) standards. The LMP provides clear guidance on the recruitment, engagement, and management of workers; specifies working conditions; establishes occupational health and safety (OHS) measures; sets up accessible and safe grievance redress mechanisms; and details procedures to prevent sexual exploitation and abuse/sexual harassment (SEA/SH), child labour, forced labour, and other forms of workplace abuse.

The LMP applies to the following category of workers:

- **Direct workers:** Project staff and consultants engaged by the PIU.
- **Contracted workers:** Employees of contractors and sub-contractors.
- **Primary supplier workers:** Personnel employed by suppliers providing goods or services under project contracts.

Community workers do not apply. As a living document, the LMP will be updated periodically to reflect evolving project activities, emerging risks, regulatory changes, and lessons learned, ensuring ongoing compliance with ESF standards and continuous protection of workers' rights, health, and safety.

## 2.0 OVERVIEW OF LABOUR USE ON THE PROJECT

### 2.1 Categories of Workers

The LMP applies to all Project workers, whether full-time, part-time, temporary, or migrant. The World Bank's ESF ESS 2 defined the project workers as:

1. **Direct workers:** Staff employed or appointed by the Project Implementation Unit (PIU) and other government agencies to manage and oversee the project. These include project managers, financial management specialists, procurement officers, engineers, IT technicians, social and gender specialists, OHS officers, grievance redress officers and monitoring and evaluation (M&E) specialists. Some direct workers may be civil servants seconded to the project.
2. **Contracted workers:** Personnel engaged by contractors, sub-contractors and NGOs to perform core functions such as cash transfer delivery, training, civil works, construction of facilities, ICT services, logistics, security or auditing. Contracted workers also include technical consultants and implementing partners engaged through service contracts.
3. **Primary supply workers:** Workers employed by suppliers of goods and materials required for the project (e.g., office equipment, medical supplies, construction materials). Suppliers must demonstrate that they do not use child or forced labour and adhere to occupational safety standards.

### 2.2 Number of Project Workers

During the project's life cycle, the PIU may employ up to 50 direct workers across MoLSA and regional offices. Contracted workers may number in the hundreds depending on the scale of cash distribution, training programmes and construction work. Community labour demand will vary by location; for example, 200–300 community members may be engaged during youth employment public works. Primary suppliers may have a small workforce, but due diligence must ensure compliance with labour standards. Detailed staffing plans will be finalized in annual work plans and procurement documents.

**Table 1: Description of Project Direct Workers**

S/N	Category	Estimated Number	Responsibility of Worker
1	<b>Project Implementing Unit (PIU)</b>	25	Directly responsible for implementation of components and Overall project management
2	<b>Operations Team</b>	5	The Operations Team is responsible for the delivery of the Baxnaano programme on the

S/N	Category	Estimated Number	Responsibility of Worker
			ground and supervises the work of the SLDSTs and District Coordination Officers.
3	<b>USR and Systems Team</b>	4	The USR and Systems Teams are responsible for the management of the Unified Social Registry. Its responsibilities include data governance and management, including data protection, security and privacy for the social registry.
			The Systems Team is also responsible for managing the programs IT systems and management information system. This team is responsible for the Somalia Social Protection Delivery systems including continued development on an ongoing basis to ensure availability of support to build new modules and updates as needed.
5	<b>Safeguards Team</b>	3	The Safeguards Team is responsible for ensuring compliance on social, environment, gender and security safeguards. The team works closely with the Operations Team to ensure all safeguard instruments including the grievance redress, citizen engagement and compliance with safeguard standards are ensured.
6	<b>Fiduciary Team</b>	4	The Fiduciary Team is led by the Program Manager and is responsible for ensuring effective procurement and financial management across the Program.

## 3.0 ASSESSMENT OF KEY POTENTIAL LABOUR RISKS

The primary labor risks associated with the project are assessed to involve potentially hazardous work or the use of hazardous materials at construction sites, as well as the risk of accidents. Additional activities will include conducting assessments and providing capacity training for PIU and beneficiaries. Consequently, there is a probable risk and impact on health, including exposure to infections and the transmission of sexually transmitted diseases due to an increase in commercial sex transactions, particularly around project sites and surrounding areas. All project workers (direct, contracted and primary suppliers) are potentially at risk of being engaged under inadequate working conditions that do not comply with national labor laws and Environmental and Social Standard 2 (ESS2): Labor and Working Conditions requirements.

### 3.1 Key Labour Risks

- **Child and forced labour:** Somalia's labour code prohibits employing children under 15 and requires employers to verify the age and fitness of young workers. Given the prevalence of child labour in the informal sector, the project will strictly verify age documents and monitor contractors and suppliers for compliance. Forced or bonded labour in any form is prohibited.
- **Gender-based violence and SEA/SH:** There is a risk of sexual exploitation and harassment during recruitment, in worker accommodations and in interactions with beneficiaries. The project will implement a zero-tolerance policy, enforce a Code of Conduct, provide mandatory SEA/SH training and establish confidential reporting and referral mechanisms.
- **Occupational health and safety:** The anticipated project workers will include direct workers (Secretariat staff, other relevant government staff), contracted workers, and primary supplier workers. The workers may be exposed to OHS hazards associated with work travels, enumeration work, administration of vaccines, standard office work and insecurity risks.
- **Discrimination and unequal treatment:** Risks include gender, clan or disability-based discrimination in recruitment, promotion, remuneration or termination. The LMP commits to non-discrimination and equal opportunities.
- **Security risks:** Somalia's security environment includes threats of violence, kidnapping, theft and armed conflict. Workers may be exposed during travel or field assignments. The project will implement a security risk management plan.
- **Labour disputes and grievances:** Workers may raise complaints about wages, overtime, contract terms, or safety concerns. Without a formal mechanism, disputes may disrupt

operations. The project establishes a grievance redress mechanism to address such issues swiftly and transparently.

## 3.2 Mitigation Measures

### 1. Child and Forced Labour:

- Somalia's labour code prohibits employment of children under 15 and requires verification of age and fitness for young workers.
- Given the prevalence of child labour in the informal sector, the project will strictly verify age documentation, monitor contractors and suppliers for compliance, and prohibit all forms of forced or bonded labour.

### 2. Gender-Based Violence and SEA/SIH:

- Workers may face risks of sexual exploitation and harassment during recruitment, in accommodation, or in interactions with beneficiaries.
- A **zero-tolerance policy** will be enforced, supported by mandatory SEA/SIH training, the Code of Conduct, and confidential reporting and referral mechanisms, in alignment with ESS2 and ESS4.

### 3. Occupational Health and Safety (OHS):

- Workers may encounter risks from exposure to hazardous materials in hospitals, poor ergonomics, insecurity, and traffic accidents.
- The project will conduct OHS risk assessments, provide PPE, ensure sanitary facilities and first aid, and deliver safety training and supervision.

### 4. Discrimination and Unequal Treatment:

- Risks include discrimination based on gender, clan, disability, or other factors in recruitment, promotion, remuneration, or termination.
- The LMP commits to non-discrimination, equal opportunity, and fair treatment for all workers, consistent with ESS2.

### 5. Security Risks:

- Somalia's security environment includes threats of violence, kidnapping, theft, and armed conflict.
- Workers may be exposed during travel or field assignments.
- A security risk management plan (see Section 15) will implement mitigation measures, including risk assessments, security protocols, and training.

### 6. Labour Disputes and Grievances:

- Workers may raise complaints about wages, overtime, contract terms, or safety concerns.
- A formal grievance redress mechanism (GRM) will address these issues promptly and transparently, ensuring ESF-compliant protection of workers' rights and reducing operational disruption.

## 4.0 BRIEF OVERVIEW OF LABOUR LEGISLATION

This section outlines the key aspects of national labor legislation concerning terms and conditions of work and explains how national laws apply to different categories of workers, with a particular emphasis on legislation related to employment terms and conditions.

### 4.1 Relevant laws

Somalia's labour laws are mainly derived from the Labour Code (2024) and the Provisional Constitution. Key provisions include:

- **Employment contracts:** Written contracts must state the worker's identity, job description, wages, hours, benefits and termination conditions. Notice periods for termination are 10 days for manual labourers and 30 days for other workers.
- **Working hours:** Standard working hours are eight per day and 48 per week. Overtime is voluntary, capped at 12 hours per week and paid at a premium.
- **Leave and benefits:** Employees earn at least 15 days of paid annual leave after one year of service; women receive 14 weeks of maternity leave on partial pay; all workers are entitled to weekly rest days and public holidays.
- **Minimum age and prohibition of child labour:** Children under 15 cannot be employed. Young workers aged 15–18 may only do light work that does not jeopardize health or education. Regular medical checks are required for young workers.
- **Gender equality and non-discrimination:** The constitution mandates equal rights and protection from sexual abuse and segregation. Employers cannot dismiss women due to pregnancy or discriminate based on union membership.
- **Freedom of association:** Workers have the right to form and join trade unions and bargain collectively.
- **Occupational health and safety:** Employers must maintain workplaces free of hazards, provide PPE, sanitary facilities and drinking water, and ensure first aid and emergency evacuation.
- **Grievance and dispute resolution:** The labour code provides for conciliation through district labour inspectors. The labour courts adjudicate unresolved disputes.

Somalia has also ratified ILO's fundamental Conventions including.

- Forced Labour (ILO C29 and C105)
- Freedom of Association and Protection of the Right to Organize (ILO C87 and C98)
- Equal Remuneration (ILO C100)
- Discrimination in Employment and Occupation (ILO C111)
- Minimum Age for Employment (ILO C138)

The fundamental requirements of employment laws are largely consistent with ESS2 and ESS4. The national labor directives cover aspects such as working hours, benefits (if any), job descriptions, leave entitlements, wage protection, termination of employment, grievance procedures, and codes of conduct, as well as the prohibition of child or young person labor. Additionally, the legislation specifies occupational health and safety standards, categories of workers (including protected, non-protected, and casual workers), and provisions for national health coverage.

The PIU will ensure that national Labour legislation together with ESS2 and ESS4 requirements are followed to guide the project and protect both the workers and employers. Below is a summary of the guiding laws.

S/N	Legislation	Description	Project Activity
1	Somalia Labour Code (2024)	Primary legal framework governing employment relations, working conditions, and labour rights in Somalia.	Applies to all project workers engaged under the PIU, contractors, and service providers. Guides fair labour practices and ensures compliance with ESS2.
2	Occupational Health and Safety (OHS) Regulations (under Labour Code 2024)	Establishes employer obligations to ensure safe and healthy working environments.	Ensures that contractors implement OHS plans and conduct regular safety briefings for project workers and field staff.

#### **World Bank instruments (ESS2 & ESS4) relevant to the BOOST YOU Project:**

World Instrument	Bank Objective	Provisions
<b>World Bank ESS2: Labour and Working Conditions</b>	To ensure fair treatment, non-discrimination, and safe working conditions.	Guides preparation and implementation of LMP and OHS Plans for all project activities and contractors.
<b>World Bank ESS4: Community Health and Safety</b>	Aims to anticipate and mitigate community exposure to project-related risks.	Ensures community safety during field activities, data collection, and cash delivery operations

## 4.2 Applicability of the laws

No.	Legislation	Provisions of the Act Relevant to the Project	Applicability to the Project
2	<b>Labour Code, Law No. 36 of 2024</b>	<ul style="list-style-type: none"> <li>Expands definitions of “worker” to include informal and community workers.</li> <li>Strengthens provisions on occupational safety, accident reporting, and compensation.</li> <li>Aligns national law with ILO Conventions C155 (OHS) and C187 (Promotional Framework).</li> </ul>	BOOST YOU activities — including skills development and service delivery — should be aligned with this new framework to demonstrate good-practice compliance and anticipate full adoption.
3	<b>National Policy on Occupational Safety and Health.</b>	<ul style="list-style-type: none"> <li>Establishes a national framework for OHS management, hazard identification, prevention, and response.</li> <li>Promotes workplace risk assessments, health surveillance, and training programs.</li> <li>Encourages establishment of OHS committees and reporting mechanisms.</li> </ul>	BOOST YOU is a large-scale youth employment; this policy provides guidance for operationalizing OHS at field level, especially during public works, training, and facility-based activities.
4	<b>World Bank Environmental and Social Standard 2 (ESS2)</b>	<ul style="list-style-type: none"> <li>Requires projects to protect workers’ rights, promote safe and healthy working conditions, and prevent accidents or injuries.</li> <li>Mandates preparation and implementation of Labour Management Procedures (LMP) and Occupational Health &amp; Safety Plans (OHSP).</li> </ul>	This is a binding safeguard requirement for the BOOST YOU Project. It supplements national law and ensures compliance with international OHS standards for all categories of workers.

## 5.0 OCCUPATIONAL HEALTH AND SAFETY (OHS)

The BOOST YOU Project is committed to ensuring the highest standards of Occupational Health and Safety (OHS) for all categories of workers—direct, contracted and primary supply. The Project recognizes that a safe and healthy working environment is fundamental to worker well-being, operational efficiency, and compliance with the Somalia Labour Code (2024) and the World Bank Environmental and Social Standard 2 (ESS2).

All workers have a shared responsibility to safeguard their own health and safety, as well as that of their colleagues and communities affected by project activities. Workers must strictly adhere to all OHS procedures, utilize provided personal protective equipment (PPE) correctly, and promptly report any hazards, unsafe conditions, or near-miss incidents to their supervisors or designated OHS focal persons.

OHS is a core component of the Labour Management Procedures. Some of the OHS measures to be considered are:

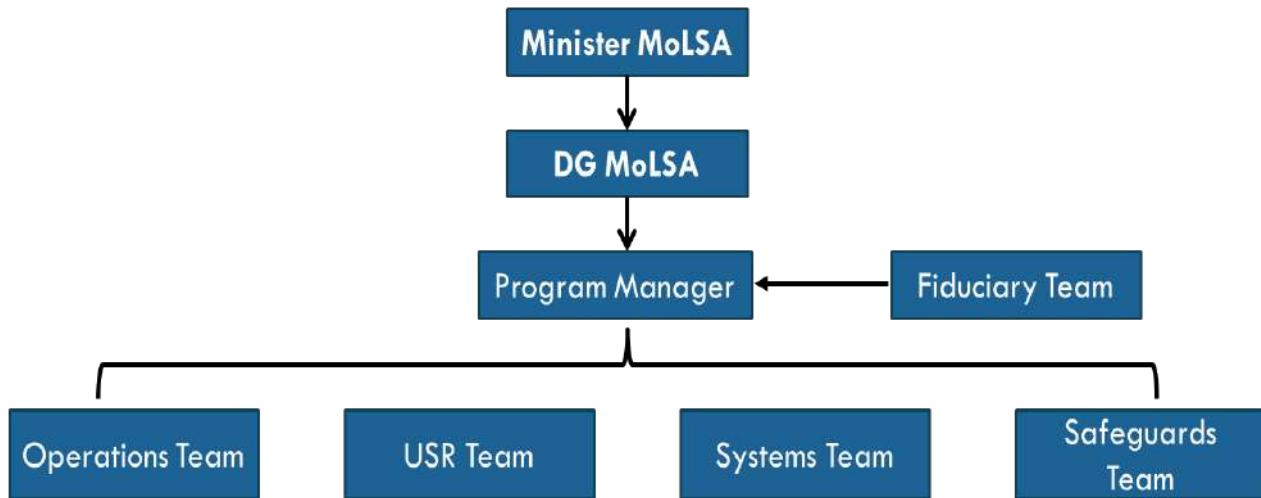
- Undertake risk assessments to identify and analyze potential OHS hazards to workers; before commencing various project activities. For civil works related activities, further OHS measures shall be defined in the respective ESMPs.
- Provide appropriate sanitation facilities at the workplace and appropriate PPE for all workers including women and persons with disability, as needed;
- Training of workers on hazard/risk identification and mitigation measures before being allowed to start activities that generate the risks and refresher trainings shall be provided. The PIU to maintain records of all the worker trainings done;
- Ensure documentation and timely reporting of OHS accidents and incidents;
- All workers shall be sensitized on the Security Management Plan (SecMP) and expected to adhere to it throughout including in their journey plans.
- Ensuring project drivers are duly qualified and trained in defensive driving. Only designated drivers shall be allowed to operate project vehicles and suitable journey plans shall be maintained.
- Ensure project vehicles are maintained through regular servicing as per manufacturers specification and records maintained. The government of Somalia vehicle fleet management policy shall be applied. All project vehicles shall be insured, and maintained throughout the project implementation.
- Develop and operate safety protocols to reduce the risk of exposure to infectious diseases such as HIV/AIDS.
- In the event of a fatality or serious injury, the PIU shall report to the Bank no later than 48 hours after learning of the incident or accident (ESIRT, March 2023) and inform the government authorities (where available) in accordance with national reporting

requirements (Labor Code Article 102). Corrective actions shall be implemented in response to project-related incidents or accidents. The PIU Environmental Specialist together with Social/GBV specialists will conduct a root cause analysis for designing and implementing further corrective actions.

## 6.0 INSTITUTIONAL ARRANGEMENTS AND RESPONSIBILITIES

### 6.1 Organogram

The organogram outlined here is preliminary and, as experience is built in the delivery of the program, additional roles may be added while responsibilities are modified.



This framework ensures clear accountability, adherence to ESF standards, and protection of workers' rights, safety, and wellbeing across all project activities.

### 6.2 Implementation arrangements

#### 6.2.1 Project Implementation Unit (PIU)

- Housed within the Ministry of Labour and Social Affairs (MoLSA), the PIU is responsible for coordinating all labour management activities.
- Responsibilities include ensuring labour clauses are incorporated in procurement documents, reviewing monthly labour reports from contractors, conducting site inspections, managing the grievance mechanism, monitoring compliance, and liaising with MoLSA on labour policy.

#### 6.2.2 Ministry of Labour and Social Affairs (MoLSA)

- Sets national labour policy, enforces the labour code, and supports labour inspections.
- MoLSA staff will provide guidance on contracts, handle appeals, participate in inspections, and coordinate with regional/state labour authorities.
- MoLSA ensures project practices align with national laws and ESF standards.

#### 6.2.3 Contractors and Sub-contractors:

- Must prepare Labour Management Plans consistent with the project LMP.
- Ensure workers are trained in OHS, SEA/SW prevention, and the Code of Conduct; provide PPE and safe working conditions; pay wages and benefits on time; and maintain grievance logs.
- Sub-contractors are required to comply with the same standards and are subject to PIU monitoring and audits.

#### 6.2.4 Primary Suppliers

- Must certify that no child or forced labour is used, that workers are treated fairly, and that occupational safety standards are met.
- The PIU will conduct due diligence and periodic audits to verify compliance with the LMP and ESS2/ESS4 requirements.

#### 6.2.6 Independent Auditors and External Specialists

- External consultants may be engaged to evaluate labour practices, OHS compliance, SEA/SW risk management, and adherence to ESF standards.
- Their findings will inform corrective actions, updates to the LMP, and ongoing risk mitigation.

## 7.0 TRAINING FOR WORKERS

To strengthen institutional capacity, ensure compliance with ESF standards, and promote sustainability of labour management practices, the project will implement the following training and capacity-building measures:

1. **Induction Training:** All project workers direct, contracted, and community-based will receive initial training covering labour rights, occupational health and safety (OHS), sexual exploitation and abuse/sexual harassment (SEA/SH) prevention, grievance mechanisms, security protocols, and the project Code of Conduct. Training will be delivered in accessible formats and local languages with the support of translators to ensure full understanding.
2. **Refresher Courses:** Annual refresher training will be provided to reinforce knowledge and adapt to emerging risks. Supervisors and senior management will receive additional modules on leadership, conflict resolution, diversity, equity, and inclusion to strengthen responsible oversight and management of teams.
3. **Specialized Training:** The E&S team will undergo specialized training on:
  - **OHS:** Hazard identification, incidents and accidents investigation, emergency response, employee training and compliance monitoring.
  - **SEA/SH:** Survivor-centered care, reporting protocols, and prevention strategies.
  - **GRM:** Effective listening, record-keeping, mediation, and follow-up.
  - **Security:** Human rights, GBV prevention, appropriate use of force, and community engagement.
4. **Peer Learning and Mentorship:** Peer-to-peer learning and mentorship programs will be promoted among project staff and contractors, allowing experienced personnel to guide new staff. Opportunities for learning exchanges with other projects or countries will be encouraged to share best practices and lessons learned.
5. **Community Awareness Sessions:** Community leaders, youth groups, and local stakeholders will be trained to raise awareness about labour rights, safety, SEA/SH prevention, and grievance mechanisms. These sessions will emphasize the community's role in monitoring labour practices, reporting abuses, and supporting safe and respectful work environments.

These capacity-building measures will enhance project compliance with ESS2 and ESS4, foster a culture of accountability and safety, and ensure sustainable labour management practices beyond the project lifecycle.

## 8.0 POLICIES AND PROCEDURES

The BOOST-YOU project is dedicated in guaranteeing that all decisions regarding the employment and treatment of project workers are made without any form of discrimination. Employment within the project will strictly follow the principles of equal opportunity and fair treatment, ensuring there is no discrimination in recruitment, hiring, compensation working conditions, access to training, promotion, or disciplinary practices. This section details the core policies and procedures to be adhered to throughout the project's implementation. These procedures are not exhaustive and may be revised as necessary.

The following minimum requirements will guide the recruitment and management of project workers under BOOST YOU.

1. **Transparent Recruitment:** Recruitment will be based on merit and competence, with preference given to qualified women and persons with disabilities. Advertisements must be public and non-discriminatory. Age verification and reference checks are mandatory.
2. **Equal Opportunity and Non-Discrimination:** The project will ensure equal access to employment and training opportunities. Any form of discrimination—based on gender, clan, ethnicity, disability or union membership—is prohibited.
3. **Prohibition of Child and Forced Labour:** Workers must be at least 18 years old for hazardous work and 15 years for non-hazardous tasks. Forced or bonded labour is strictly forbidden, and contracts must be voluntary.
4. **Written Contracts:** All workers receive written contracts or appointment letters describing duties, compensation, benefits, working hours, entitlement leave, grievance procedures and termination conditions. Contracts must be understood in a language by the worker.
5. **Language and Clarity:** Terms and conditions of employment will be communicated in a language understood by both the employer and the employee
6. **No Hiring Fees:** Workers will not be required to pay hiring fees; if such fees are incurred, the employer (i.e., the contractor) will cover them.
7. **Confidentiality and Data Protection:** Personnel records, grievances and SEA/SH reports will be kept confidential. Only authorised staff can access them, and personal data will be anonymised for reporting.
8. **Record-Keeping and Reporting:** Contractors must keep records of workers' identities, contracts, wages, working hours, leave, OHS training, accidents and grievances. These records will be submitted monthly to the PIU for review.
9. **Worker Code of Conduct:** Contractors must develop a Code of Conduct for all workers, which BOOST-YOU will review to ensure alignment with project standards.

### **8.1 Prohibition of forced and Child Labor**

BOOST YOU strictly prohibits forced and child labor. Contractors, suppliers, and service providers will ensure no worker is forced to work under any form of duress, coercion, or limitation of freedom. Contractors ensure workers' rights to terminate their employment freely within the legal framework.

### **8.2 Occupational Health and Safety Compliance**

BOOST YOU is committed to:

1. Abide by national legislation, World Bank standards, and the World Bank Group Environmental, Health, and Safety (EHS) guidelines.
2. Promote active participation in OSH risk mitigation through skills training and awareness.
3. Strive to improve OSH management and performance continually.
4. Regular communication ensures that all workers know OSH's responsibilities.
5. Make this OSH policy available to all parties at BOOST YOU facilities and sites.

BOOST YOU will ensure that all its contractors designate a Safety, Health, and Environmental Representative at each workplace. This representative is responsible for:

- Identifying potential OHS hazards and provide appropriate corrective actions.
- Ensuring all workers undergo an induction training prior to commencement of works
- Investigating accidents in collaboration with the employer.
- Inspecting workplaces to ensure employee safety and health.
- Making safety and health recommendations to the employer or safety committee.
- Accompanying inspectors during workplace inspections.

### **8.3 Occupational Health and Safety for Contractors**

To prevent workplace accidents and injuries, contractors will:

- Have an OHS Policy to be signed by top management of the organization as part of the SMP
- Employ workers with relevant and adequate training for specialized roles
- Provide OHS Training: Offer safety training to all employees involved in project activities.
- Supply PPE: Ensure all workers can access PPE, such as masks, helmets, gloves, safety boots, and goggles.
- Safety Equipment: Equip high-noise areas with ear protection and ensure the availability of first aid kits.
- Provide appropriate work equipment including safe machinery and hand tools
- Access to Facilities: Provide access to toilets, potable water, and other necessary facilities.

- Implement Waste Management: Follow proper waste disposal and pollution prevention protocols.
- No PPE, No Pay Policy: Contractors must enforce PPE use through a strict "No PPE, No Pay" policy.

#### **8.4 Risk and Incident Reporting**

Contractors are required to:

- Conduct site risk assessments for all tasks prior to commencement of works and fill in the site risks assessment form with corrective actions.
- Prepare safe systems of work and method statements.
- Put in place incident reporting procedures including incident registers for recording of all incidents
- Report all incidents including near misses and minor incidents to Project Management Unit monthly.
- Report serious incidents or fatalities within 24 hours to BOOST YOU and the World Bank.
- Log all incidents and accidents, incorporating them into regular monitoring and evaluation.

## 9.0 GENDER BASED VIOLENCE, SEXUAL EXPLOITATION AND ABUSE AND SEXUAL EXPLOITATION

To address the risk of sexual exploitation, abuse and harassment, the project will implement the following measures:

1. Code of Conduct: All workers—including contractors and security staff—must sign a Code of Conduct that prohibits SEA/SH, harassment, child labour and trafficking. The code clearly defines unacceptable behaviour, outlines disciplinary measures and requires reporting of violations.
2. Training: Mandatory SEA/SH training will be provided at induction, with refresher sessions at least annually. Training covers definitions of SEA/SH, power dynamics, consent, bystander intervention and reporting procedures.
3. Risk Mapping: Identify locations and activities with heightened SEA/SH risk (e.g., worker accommodation, remote worksites). Implement mitigation measures such as gender-balanced teams, separate accommodations for men and women and additional supervision.
4. Reporting and Response: Ensure multiple, confidential channels for SEA/SH reporting. Designate a SEA/SH focal point to receive and handle complaints, ensure survivor-centred referrals, and liaise with specialised service providers. Serious allegations will be investigated promptly, and perpetrators will face disciplinary action and legal consequences.
5. Awareness-Raising: Conduct regular outreach to communities and beneficiaries on SEA/SH prevention, rights and reporting. Involve local leaders, women's groups and youth networks to disseminate information.

### 9.1 Sexual Exploitation, Abuse, and Harassment (SEA/SH) Prevention and Response Plan

To prevent and respond to SEA/SH risks, the project will implement the following measures:

1. **Code of Conduct:**
  - All project workers including direct staff, contractors, sub-contractors, and security personnel must sign a Code of Conduct.
  - The code explicitly prohibits SEA/SH, harassment, child labour, trafficking, and exploitation.
  - It clearly defines unacceptable behaviours, reporting obligations, and disciplinary measures, in accordance with national law and ESF requirements.
2. **Mandatory Training:**
  - Provide induction SEA/SH training for all workers, with annual refresher sessions.
  - Training covers definitions of SEA/SH, power dynamics, consent, bystander intervention, reporting procedures, and worker responsibilities.

- Supervisors and security personnel receive additional role-specific modules on prevention and response.

**3. Risk Mapping and Mitigation:**

- Conduct site-specific SEA/SH risk assessments for worksites, worker accommodations, and project activities.
- Implement mitigation measures, including gender-balanced teams, separate accommodations for men and women, adequate supervision, safe transport, and restricted access to high-risk areas.

**4. Reporting and Response Mechanisms:**

- Provide multiple, confidential reporting channels (hotlines, email, SMS, in-person reporting).
- Designate a trained SEA/SH focal point to receive complaints, ensure survivor-centered support, and coordinate with specialized service providers.
- All allegations are investigated promptly, confidentially, and impartially.
- Perpetrators are subject to disciplinary measures and legal action in accordance with national law.
- Ensure non-retaliation and protection for complainants and witnesses.

**5. Community Awareness and Engagement:**

- Conduct regular awareness-raising campaigns for communities, beneficiaries, and project workers on SEA/SH risks, prevention, and reporting channels.
- Engage local leaders, women's groups, youth networks, and community-based organizations to disseminate information effectively.

**6. Monitoring, Review, and Continuous Improvement:**

- Regularly monitor SEA/SH incidents, complaints, and responses to identify trends.
- Use findings to update risk mitigation measures, training materials, and Codes of Conduct.
- Integrate SEA/SH lessons learned into project design and operational procedures.

## 9.2 Security Risk Management

The PIU will develop and implement a Security Risk Assessment and Management Plan (SRAMP) to protect workers, assets, and project operations. Core components include:

**1. Context Analysis and Risk Assessment:**

- Identify and assess security threats in each project area, including armed conflict, terrorism, banditry, kidnapping, and other localized risks.
- Rate locations by **risk level** and update assessments regularly.
- Integrate security risk data with OHS, SEA/SH, and community risk considerations.

**2. Security Personnel and Conduct:**

- Contract licensed, vetted, and trained private security providers or collaborate with government security forces as needed.
- Security personnel will receive training in human rights, SEA/SI prevention, conflict sensitivity, and the project Code of Conduct.
- Personnel must use minimum necessary force, respect worker and community rights, and avoid actions that may exacerbate risks.

**3. Travel and Field Protocols:**

- Establish procedures for travel approval, itinerary reporting, vehicle readiness, communications equipment, and convoy protocols.
- Implement safe travel practices, including travel in pairs or groups and avoidance of high-risk areas and times.
- Include emergency evacuation procedures and contingency plans for high-risk locations.

**4. Incident Reporting and Response:**

- Develop a clear reporting chain for security incidents, including threats, attacks, or breaches.
- Provide immediate support to affected staff, including medical care, psychosocial services, and legal assistance.
- Review incidents systematically to improve security protocols, training, and preventive measures.

**5. Coordination and Communication:**

- Liaise with local authorities, police, community leaders, and international security networks to enhance situational awareness.
- Share security updates and alerts promptly with project teams, contractors, and relevant partners while respecting confidentiality and privacy.

**6. Monitoring and Continuous Improvement:**

- Regularly monitor security conditions, incidents, and effectiveness of mitigation measures.
- Integrate lessons learned into project planning, worker training, and risk management procedures.
- Ensure security practices align with ESS2, ESS4, and national laws, and respect worker rights, community safety, and SEA/SI prevention measures.

## **10.0 AGE OF EMPLOYMENT**

With respect to age and employment, the following provisions shall apply.

- The project strictly prohibits the employment of children under 15 years of age.
- For hazardous, night, or physically demanding work, the minimum employment age is 18 years, in line with national law, ESS2, and ILO conventions.
- During recruitment, applicants must provide official age documentation, such as national ID cards, birth certificates, or other government-issued records.
- Where official documentation is unavailable, the project may accept medical assessments or sworn declarations, following a transparent verification process.
- The project will not engage family-run or community labour for heavy, hazardous, or high-risk tasks.
- Workers aged 15–18 years may only be assigned light, non-hazardous work.
- Their working hours will not interfere with schooling, vocational training, or essential rest periods.

## 11.0 TERMS AND CONDITIONS OF EMPLOYMENT

The BOOST YOU Project will be implemented as a government-led initiative, under the supervision of the Ministry of Labour and Social Affairs (MOLSA), funded by the World Bank. As indicated previously, the project will engage:

- Direct workers (existing civil/public service employees in Somalia)
- Contracted workers (via service/consultancy contracts)
- Primary supply workers (workers engaged by suppliers of goods/services)

The project will ensure that all terms and conditions of employment for all categories of workers comply with the minimum employment standards set out in national employment laws (including the new Somali Labour Code) and align with ESS2 and ESS4.

### 11.1 General employment conditions

- The Project will observe national employment law through entitlements such as non-discrimination and equal opportunity in recruitment and employment, and freedom of association and collective bargaining, in accordance with national law and ESS2. In the absence of any approved law for minimum wage scale, PIU shall device an SOP which shall be adopted for the project employees.
- Normal working hours shall be seven (7) hours per day, 6 days per week (Saturday to Thursday), including a one-hour lunch break.
- Workers will be entitled to a minimum of one full day of rest per week, preferably Friday, to ensure adequate recovery and work-life balance, consistent with national labour law and ESF requirements.
- Overtime work may be required during peak periods or exceptional circumstances but shall not exceed 12 hours per week. Overtime must be voluntary and cannot be imposed without the worker's prior consent. Overtime will be compensated at a premium rate of no less than **25% above the normal hourly wage**, in line with national labour law and ESS2 standards.
- Leave entitlements (annual leave, sick leave, maternity/paternity leave, special leave, etc.) will be granted in accordance with national law and Project policy (for example, 15 days paid annual leave after one year of continuous service).
- Employment contracts (for direct and contracted workers) shall clearly stipulate the nature/duration of contract, duties, working hours, wage/benefits, leave entitlements, and termination provisions, in accordance with the Somali Labor Code.
- The Project shall ensure compliance with all applicable provisions of the Somali Labor Code regarding prohibition of forced labor, child labor, trafficking, discrimination, and harassment, including sexual exploitation and abuse/sexual harassment (SEA/SH) and gender-based violence (GBV) in the workplace, in line with ESS2 and ESS4.

## **11.2 Terms & Conditions for Direct Workers**

- The terms and conditions for direct workers (those employed within the Project Implementation Unit (PIU), consultants, and staff at project-supported facilities) will be governed by national labour laws (Somali Labour Code and related regulations) and public service regulations.
- For workers on short-term/assignment-based contracts (e.g., consultants or fixed-term staff), terms will reflect the specific assignment: duration, deliverables, pay rate (per day or per assignment), and applicable benefits. Such short-term contracts may not include full entitlements (such as full maternity or annual leave) if national law and policy allow. These terms will be clearly discussed and agreed at recruitment.
- The Project will confirm that direct workers benefit at minimum from the rights guaranteed under the Somali Labour Code, including non-discrimination, safe working conditions, freedom of association, and the right to a grievance mechanism.

## **11.3 Terms & Conditions for Contracted Workers**

- Contracted workers (engaged via service/consulting contracts) shall have employment terms consistent with the provisions of the Somali Labour Code and public service regulations where relevant.
- Service providers/contractors engaged by the Project must comply with national labour law (including working hours, wages, leave, rest periods) and with ESS2 requirements (e.g., no discrimination, no child/forced labour, safe working conditions).
- Contractors/supervisors shall track working hours, ensure compliance with rest periods, monitor overtime, ensure payment of overtime premiums where required, and report any deviations to the Project Implementation Unit (PIU) for corrective action.

## **11.4 Monitoring & Compliance**

- Standard working hours for all workers engaged under the Project shall not exceed 8 hours per day or 48 hours per week, consistent with national law and ESS2.
- Workers must have at least one full day of rest per week.
- Overtime shall be voluntary, properly authorized, and compensated at premium rates ( $\geq$  25% above normal wage) and shall not exceed 12 hours per week for any worker.
- Contractors/supervisors must maintain accurate records of working hours, overtime hours, rest periods and leave taken. These records will be subject to monitoring by the Project.
- The PIU will conduct periodic audits of labour compliance (working hours, overtime, leave, rest periods, wage payments) and will report on any violations. Corrective actions will be defined and implemented as required.
- The Project will ensure that grievance mechanism arrangements are accessible to all workers (direct, contracted, community) to raise issues regarding terms and conditions,

discrimination, harassment, safety, labour rights, SEA/SH, GBV and other concerns. This aligns with ESS2 and ESS4.

- The Project will include labour-related performance indicators (e.g., compliance with hours/leave/overtime, number of grievances raised/resolved, non-discrimination metrics) and will monitor and report on these in quarterly progress and reporting cycles.

## 11.5 Wages and Benefits

### 11.5.1 Compliance with Laws and Standards

- Wages and benefits shall comply with Somalia's Labour Code (2024), contractual agreements, and relevant industry benchmarks.
- In the absence of a formally established minimum wage, fair compensation will be determined by benchmarking against comparable projects and prevailing market rates in Somalia to ensure equity and consistency with ESS2.
- The Project will prohibit any form of wage discrimination based on gender, ethnicity, disability, or other status.

### 11.5.2 Payment Methods and Documentation

- All workers will be paid monthly, through secure methods such as electronic bank transfers or verified cash payments, in line with transparency and accountability requirements.
- **Pay slips** will be provided to each worker, itemizing gross wages, allowances, overtime, deductions, and net pay.
- **Deductions** are permissible only for lawful purposes (e.g., income tax, pension, social contributions, or court-ordered obligations).
- Contractors and supervisors must maintain accurate payroll records, subject to audit by the Project Implementation Unit (PIU).

### 11.5.3 Leave and Allowances

- Workers are entitled to paid annual leave, sick leave, maternity and paternity leave, and other statutory leave in line with national law and ESS2.
- When workers are deployed away from their usual residence, reasonable allowances (for accommodation, meals, or transportation) will be provided.
- No worker shall be required to forfeit leave entitlements as a condition of continued employment.

#### 11.5.4 Death and Emergency Benefits

- In the unfortunate event of a worker's death, the Project shall provide not less than 15 days of wages or equivalent financial support to assist with funeral or emergency expenses for the worker's immediate family.

#### 11.5.5 Monitoring and Compliance

- The PIU, in collaboration with contractors, will ensure timely wage payments, compliance with national and ESF standards, and verification through worker feedback, audits, and monitoring reports.

### 11.6 Leave and Rest Periods

#### 11.6.1 Annual Leave

- All workers accrue a minimum of 1.25 days of paid annual leave per month, equivalent to 15 working days per year, consistent with the Somali Labour Code (2024).
- Annual leave is exclusive of public holidays, which are fully paid in accordance with official government declarations.
- Workers may take accrued leave with prior approval, and unused leave must not be unjustly withheld or forfeited.

#### 11.6.2 Maternity Leave and Nursing Provisions

- Female workers are entitled to 14 weeks of maternity leave, with at least six weeks taken after childbirth, in accordance with national law.
- During this period, workers shall receive no less than two-thirds of their regular pay or as defined by contract.
- Nursing mothers are entitled to two one-hour breaks per workday for breastfeeding or childcare for up to 12 months after childbirth, without loss of pay or benefits.

#### 11.6.3 Paternity Leave

- Male workers are entitled to paid paternity leave consistent with national law and Project policy, reinforcing the principles of gender equality and shared parental responsibility under ESS2.

#### 11.6.4 Sick Leave

- Workers are entitled to paid sick leave upon presentation of valid medical certification, in accordance with national labor regulations. However, in the absence of national

regulations, PIU team shall device the SOP for project staff which shall be implemented after the approval of MoLSA management.

- Prolonged or recurrent illness will be managed compassionately, ensuring no unlawful termination on health grounds.

#### 11.6.5 Rest Periods and Work–Life Balance

- Workers are entitled to daily rest breaks and a minimum of one full day of rest per week, preferably Friday, in line with national labour provisions and ESS2.
- Rest and leave provisions aim to safeguard mental and physical well-being and promote work–life balance.

#### 11.6.6 Monitoring and Compliance

- Contractors and the PIU must record and track leave accrual and utilization, maintain personnel files, and ensure compliance through regular reporting and audits.

### 11.7 Termination and Severance

#### 11.7.1 Notice of Termination

- Termination of employment must follow due process and comply with the Somali Labour Code (2024).
- Minimum notice periods shall be:
  - **10 days** for manual or short-term labourers;
  - **30 days** for other categories of workers.
- Immediate termination without notice is permissible only in cases of serious misconduct (e.g., SEA/SH, violence, theft, gross negligence) and must be supported by evidence and procedural fairness.

#### 11.7.2 Severance Pay

- Workers whose contracts are terminated for reasons other than misconduct or resignation are entitled to severance pay, calculated as stipulated in the Somali Labour Code (2024) or their employment contract.
- Severance payments shall be transparent, documented, and paid promptly, ensuring fairness and compliance with ESS2.

#### 11.7.3 Non-Discrimination

- No termination decision shall discriminate based on gender, marital status, disability, union membership, pregnancy, religion, or ethnicity.

- All termination decisions are subject to review through the Project's Grievance Redress Mechanism (GRM) or relevant labour dispute resolution bodies.

#### 11.7.4 Documentation and Compliance

- Termination notices, severance calculations, and related communications must be documented, signed, and stored confidentially.
- The PIU and contractors are accountable for ensuring full compliance with national labour laws, ESF standards, and this LMP.

### 11.8 Worker Rights and Responsibilities

#### 11.8.1 Workers' Rights

All workers engaged under the **BOOST YOU Project** are entitled to the following:

1. **Fair Compensation**
  - Receive timely and fair remuneration, including wages, allowances, and overtime pay, in accordance with national law and ESF standards.
2. **Safe and Healthy Work Environment**
  - Work in conditions that meet Occupational Health and Safety (OHS) standards, with access to PPE, sanitation facilities, clean water, and first aid.
3. **Freedom of Association and Collective Bargaining**
  - Form or join trade unions or worker associations and engage in collective bargaining without intimidation or discrimination.
4. **Non-Discrimination and Equality**
  - Be free from discrimination, harassment, or abuse based on gender, clan, ethnicity, disability, religion, or political affiliation.
5. **Maternity and Paternity Protection**
  - Access gender-sensitive benefits, including maternity and paternity leave, nursing breaks, and protection from pregnancy-related dismissal.
6. **Grievance Redress Access**
  - Access an independent and confidential grievance mechanism for resolving employment-related concerns fairly and promptly.

#### 11.8.2 Workers' Responsibilities

1. **Safety and Health Compliance**
  - Follow OHS protocols, properly use personal protective equipment (PPE), and promptly report hazards, unsafe conditions, or accidents.
2. **Respectful Conduct**

- Treat colleagues, beneficiaries, and community members with dignity and respect, avoiding discrimination, harassment, intimidation, or abuse.

### **3. Adherence to the Code of Conduct**

- Comply with the Project Code of Conduct, which strictly prohibits sexual exploitation and abuse (SEA/SH), corruption, fraud, and child or forced labour.

### **4. Participation and Cooperation**

- Engage in training, awareness sessions, and monitoring activities aimed at promoting safe, equitable, and compliant working practices.

#### **1. appliance**

- Follow OHS protocols, properly use personal protective equipment (PPE), and promptly report hazards, unsafe conditions, or accidents.

#### **2. Respectful Conduct**

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- Comply with the Project Code of Conduct, which strictly prohibits sexual exploitation and abuse (SEA/SH), corruption, fraud, and child or forced labour.

#### **4. Participation and Cooperation**

- Engage in training, awareness sessions, and monitoring activities aimed at promoting safe, equitable, and compliant working practices.

- beneficiaries, and community members with dignity and respect, avoiding discrimination, harassment, intimidation, or abuse.

#### **2. Adherence to the Code of Conduct**

- Comply with the Project Code of Conduct, which strictly prohibits sexual exploitation and abuse (SEA/SH), corruption, fraud, **and** child or forced labour.

#### **3. Participation and Cooperation**

- Engage in training, awareness sessions, and monitoring activities aimed at promoting safe, equitable, and compliant working practices.

- Hazards, unsafe conditions, or accidents.

#### **1. Respectful Conduct**

- Treat colleagues, beneficiaries, and community members with dignity and respect, avoiding discrimination, harassment, intimidation, or abuse.

#### **2. Adherence to the Code of Conduct**

- Comply with the Project Code of Conduct, which strictly prohibits sexual exploitation and abuse (SEA/SH), corruption, fraud, **and** child or forced labour.

#### **3. Participation and Cooperation**

- Engage in training, awareness sessions, and monitoring activities aimed at promoting safe, equitable, and compliant working practices.



## **12.0 GRIEVANCE REDRESS MECHANISM (GRM)**

### **12.1 Workers Grievance Mechanism**

Typical work-place grievances include fair and equal opportunity for employment; labor wages rates and delays in payment; disagreements over working conditions; and health and safety concerns in work environment. Therefore, in line with the ESS2 requirements, a separate Grievance Mechanism (GM) will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the GM at the time of recruitment and the measures put in place to protect them against any reprisal for its use.

Handling of grievances should be objective, prompt and responsive to the needs and concerns of the aggrieved workers enabling to prevent, mitigate, or resolve tensions and problems before they escalate into more serious issues that will require extra resources to address. The GM will also allow for anonymous complaints to be raised and addressed. Individuals who submit their grievances may request for confidentiality which needs to be safeguarded to ensure safety and freedom of workers that lodged complaints including ensuring whistle blower protection. The PIU will investigate any suspected breach of confidentiality where it has been requested

The GM will be designed to address concerns using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution. The GM may utilize existing grievance mechanisms, providing that they are properly designed and implemented, address concerns promptly, and are readily accessible to such project workers. Existing grievance mechanisms may be supplemented as needed with project-specific arrangements. The worker GM will not impede access to other judicial or administrative remedies that might be available under the law or through arbitration procedures or mechanisms provided through collective agreements.

Project staff will be encouraged to raise concerns with their immediate supervisor in the first instance. However if the concern relates to the project, the staff can also raise it via the social /GBV officer at the PIU level who will in turn forward to the Project Manager for resolution through the project GM.

GM for contractor workers: For all contractors, a workers GM will be required and included in bidding documents and contracts. If the contractor does not have a GM in place for contracted workers, the direct workers' GM will be made available to them.

### **12.2 Procedure of Management of Workers Grievance**

This section below outlines the procedure to be applied under BOOST-YOU in addressing grievances between project workers and their employees or amongst project employees before the

intervention of the formal court, except in cases where the grievance constitutes a criminal offense that requires notification of the law enforcement agencies.

- a. A code of conduct should be developed and translated into Somali. (Sample provided in Annex 3).
- b. All project workers should receive an orientation on the code of conduct and the workers GM and sign a code of conduct outlining their rights and responsibilities regarding OHS requirements (including security protocols and SH/SEA prevention). All records of induction shall be kept and made available for inspection by the PIU or the World Bank.
- c. In case of violation, the aggrieved employee must capture and present the details of the grievance to the immediate supervisor or the supervisor's superior in case of conflict of interest.
- d. The supervisor will verify the details and seek to address the matter within the shortest time up to 48 hours.
- e. If not resolved within 48 hours, the supervisor will escalate the matter until a resolution is found.
- f. Where no resolution is found, the employee can escalate the matter to the social /GBV officer at the PIU level who will in turn forward to the Project Manager for resolution through the project GM. The PIU, in this case, will facilitate a fair agreement between the worker and the employer.
- g. Where the formal courts are not accessible, do not exist in an area, or cannot render a judgment, the matter shall be reported to and handled through the Project GM. The PIU, in this case, will facilitate a fair agreement between the worker and the employer.
- h. The Contractor shall keep records of all proceedings of GM that are within its jurisdiction and furnish the PIU as part of the periodic progress reporting.
- i. All GBV SEA/SH related grievances should follow the GBV/SEA Prevention and Response Action Plan (GBV SEA/SH PRP) referral pathways and complaints resolution mechanism (more details are provided in the project (GBV SEA/SH PRP).
- j. In case of risk of retribution, the employee may immediately escalate to the court system or to the PIU as noted above.

### **12.3 Grievances related to Gender Based Violence (GBV)**

The assessment of the project-related GBV SEA and SH risk is substantial. This is because project activities will likely be implemented in districts/communities where SEA/SH and other forms of Gender-Based Violence (GBV), such as Intimate Partner Violence (IPV), are prevalent as a result of high insecurity, cultural norms, high levels of poverty and marginalization, severe spells of drought and famine, unemployment, low levels of literacy and project investments rolled out in a context of limited resources against widespread need.

The GBV Specialist with the support of the Social Specialist will be the main Focal Person responsible for ensuring GBV related complaints are addressed. Further, the project will provide various avenues for reporting GBV/SEA/SH cases. Such avenues include through the Project Coordinator and the Social and GBV specialists, staff handling the call centers, or through the GM Hotline (2668) or through [grm@baxnaano.so](mailto:grm@baxnaano.so). A dedicated labour GRM suggestion box is located at MOLSA labour GRM office in Mogadishu. Complaints relating to GBV SEA/SH will be addressed immediately by referring the GBV survivors to support services as per the GBV Referral Pathway.

In line with the survivor-centered approach, the grievance recipient to whom an allegation is disclosed will provide a safe, caring, and supportive environment. This means being non-judgmental, empathetic, and compassionate, and demonstrating emotional support to the survivor while clarifying relevant information. It also means respecting confidentiality and the wishes of the survivor. Once a case has been taken in by a GM operator or via the identified focal points, informed consent of the survivor is obtained to proceed with the case, the case file/information will be submitted to the PIU GBV Specialists with the support of the Social Specialist. The GBV Specialists will ensure that the survivor has been provided with all necessary GBV referral services and will ensure that the survivor is safe.

#### **12.4 World Bank Grievance Mechanisms**

If a complaint about the project or serious labor complaints (such as forced labor, child labor, or OHS incidents including SEAH) has been raised with the FGS PIU, and no satisfactory response has been received, complaints from workers can be raised with the World Bank Somalia office via email to [somaliaalert@worldbank.org](mailto:somaliaalert@worldbank.org).

## 13.0 CONTRACTOR AND SUB-CONTRACTOR MANAGEMENT

All contractors will be procured through a transparent and competitive process, consistent with the Project's established procurement guidelines. This process will include:

- **Competitive Bidding:** Conducted through open and transparent advertisement to ensure fairness and equal opportunity.
- **Shortlisting and Selection:** Based on clear evaluation criteria, including technical capacity, experience, and compliance with environmental and social safeguards.
- **Contractual Signing:** Formal agreements between the implementing agency and selected contractors, detailing obligations and accountability mechanisms.

To ensure compliance with labor and working condition requirements, the BOOST YOU Project will integrate Environmental and Social (E&S) provisions including labor management obligations into all contracts and bidding documents. Each contractor will be required to prepare a Contractor's Social Management Plan (SMP) and a Code of Conduct for all workers to sign and adhere to.

BOOST YOU will conduct regular monitoring and evaluation of contractor and sub-contractor performance, consistent with the Project's Monitoring and Evaluation Framework and Labor Management Procedures (LMP). The Project will also enhance workers' awareness of their rights, entitlements, and available grievance channels.

### 13.1 Contractor and Sub-contractor Obligations

All contractors and their sub-contractors are expected to uphold the highest standards of occupational safety, labor welfare, and ethical conduct. Specifically, they shall:

- **Monitor, Record, and Report:** Maintain comprehensive records and submit periodic reports on labor management, including worker contracts, induction and orientation, working hours, remuneration, overtime, and adherence to collective bargaining agreements where applicable.
- **Safety Management:** Record and investigate all occupational incidents and near misses; conduct root cause analyses; and report first aid cases, high-potential near misses, and other occupational health and safety (OHS) concerns. Job safety analyses must be reviewed regularly, and appropriate safety training provided when new procedures or equipment are introduced.
- **Worker Records and Demographics:** Keep detailed, up-to-date records of the workforce, including numbers, gender, age (ensuring strict prohibition of child labor), nationality (local or expatriate), and skill level (unskilled, skilled, supervisory, professional, or managerial).

- **Training and Capacity Building:** Maintain a comprehensive training register capturing training dates, attendance lists signed by participants, topics covered, and total number of trainees. Continuous capacity building shall be ensured to strengthen worker competencies and promote a safe and productive work environment.
- **Security and Risk Management:** Identify, assess, and manage security risks that may arise during project implementation, including those related to third-party interference or external threats, in alignment with the Project's **Security Management Framework**.
- **Worker Grievances:** Establish and maintain an accessible Worker Grievance Redress Mechanism (GRM) to receive, document, and resolve worker concerns in a timely and confidential manner. Records shall include dates of occurrence, nature of grievance, actions taken, resolution status, and follow-up measures. Regular summary reports will be submitted to the implementing agency for oversight and continuous improvement.

### 13.2 Monitoring and Enforcement

The BOOST YOU Project, through its Project Implementation Unit (PIU), will ensure that contractors and sub-contractors adhere strictly to the provisions of the Labor Management Procedures (LMP), Environmental and Social Framework (ESF), and applicable national labor laws. Regular audits, site inspections, and performance evaluations will be conducted to verify compliance, identify gaps, and recommend corrective actions where necessary.

### 13.3 Code of Conduct

The Code of Conduct developed by contractors will aim to prevent and mitigate social risks associated with project activities. This includes addressing risks of gender-based violence (GBV), sexual exploitation and abuse (SEA), sexual harassment (SH), child labor, forced labor, wage disputes, health risks (such as HIV/AIDS), and environmental issues. The BOOST YOU will require contractors to establish a safe working environment, and this Code of Conduct will serve as a legally binding document that sets behavioral standards for all workers. Annex 3 provides a Code of Conduct for every worker engaged by the contractor.

### 13.4 Incident Reporting

The PIU will report to the World Bank upon learning about the incident and trigger the Bank's Environmental and Social Incident Toolkit (ESIRT) in the event of:

- Fatality
- Lost Time Injury.
- Acts of Violence/Protest.
- Sexual Exploitations and Abuse/ Sexual Harassment
- Disease Outbreaks.
- Forced Labor, and

- Others such as an incident requiring hospitalization and resulting in major and multiple injuries.

The PIU shall report the incident within 24 hours of its occurrence, followed by a detailed report to be submitted within 10 days. Thereafter, PIU shall ensure that corrective actions are completed adequately.

## 14.0 PRIMARY SUPPLY WORKERS

The project will ensure that primary suppliers (e.g., suppliers of medical kits, ICT equipment, construction materials) meet labour and safety standards. Procurement documents will require suppliers to certify the absence of child labour, forced labour and serious safety risks. Due diligence will include checking supplier policies, on-site inspections and verifying training records. If violations are found, suppliers must implement corrective actions; continued non-compliance will result in contract termination and alternative suppliers will be sourced. Key measures include:

### 1. Contractual Requirements:

- Procurement documents must require suppliers to **certify compliance** with labour laws, including prohibition of child and forced labour, non-discrimination, and occupational health and safety (OHS) standards.
- Suppliers must adopt policies and procedures aligned with ESS2 and provide evidence of worker training and welfare practices.

### 2. Due Diligence:

- Conduct **pre-contract assessments**, including review of policies, procedures, and prior compliance records.
- Perform on-site inspections to verify working conditions, safety measures, and training implementation.
- Monitor **ongoing compliance** through periodic audits and reporting.

### 3. Corrective Actions and Enforcement:

- Suppliers found in violation must implement corrective action plans within a specified timeframe.
- Persistent non-compliance may result in contract termination, replacement of suppliers, and reporting to relevant authorities as required.

## Annexes

### Annex 1: Sample of Employment Contract

This contract, dated on the \_\_\_\_\_ day of \_\_\_\_\_ in the year 20\_\_\_\_, is made between [company name] and [employee name] of [city, state]. This document constitutes an employment agreement between these two parties and is governed by the laws of [state or district].

WHEREAS the Employer desires to retain the services of the Employee, and the Employee desires to render such services, these terms and conditions are set forth.

IN CONSIDERATION of this mutual understanding, the parties agree to the following terms and conditions:

#### 1. Employment

The Employee agrees that he or she will faithfully and to the best of their ability to carry out the duties and responsibilities communicated to them by the Employer. The Employee shall comply with all company policies, rules and procedures at all times.

#### 2. Position

As a [job title], it is the duty of the Employee to perform all essential job functions and duties. From time to time, the Employer may also add other duties within the reasonable scope of the Employee's work.

#### 3. Compensation

As compensation for the services provided, the Employee shall be paid a wage of \$/ZMW\_\_\_\_\_ [per hour/per annum] and will be subject to a(n) [quarterly/annual] performance review. All payments shall be subject to mandatory employment deductions (State & Federal Taxes, Social Security, Medicare).

#### 4. Benefits

The Employee has the right to participate in any benefits plans offered by the Employer. The employer currently offers [list benefits, if any]. Access to these benefits will only be possible after the probationary period has passed.

#### 5. Probationary Period

It is understood that the first [time frame] of employment constitutes a probationary period. During this time, the Employee is not eligible for paid time off or other benefits. During this time, the Employer also exercises the right to terminate employment at any time without advanced notice. Check the term and conditions.

## 6. Paid Time Off

Following the probationary period, the Employee shall be eligible for the following paid time off:

- [length of time for vacation]
- [length of time for sick/personal days]
- Bereavement leave may be granted if necessary.

The employer reserves the right to modify any paid time off policies.

## 7. Termination

It is the intention of both parties to form a long and mutually profitable relationship. However, this relationship may be terminated by either party at any time provided [length of time] written notice is delivered to the other party.

The Employee agrees to return any Employer property upon termination.

## 8. Non-Competition and Confidentiality

As an Employee, you will have access to confidential information that is the property of the Employer. You are not permitted to disclose this information outside of the Company.

During your time of Employment with the Employer, you may not engage in any work for another Employer that is related to or in competition with the Company. You will fully disclose to your Employer any other Employment relationships that you have and you will be permitted to seek other employment provided that (a.) it does not detract from your ability to fulfill your duties, and (b.) you are not assisting another organization in competing with the employer.

It is further acknowledged that upon termination of your employment, you will not solicit business from any of the Employer's clients for a period of at least [time frame].

## 9. Entirety

This contract represents the entire agreement between the two parties and supersedes any previous written or oral agreement. This agreement may be modified at any time, provided the written consent of both the Employer and the Employee.

## 10. Legal Authorization

The Employee agree that he or she is fully authorized to work in [community name] and can provide proof of this with legal documentation. This documentation will be obtained by the Employer for legal records.

## 11. Severability

The parties agree that if any portion of this contract is found to be void or unenforceable, it shall be struck from the record and the remaining provisions will retain their full force and effect.

## 12. Jurisdiction

This contract shall be governed, interpreted, and construed in accordance with the laws of [state, province or territory].

## Occupational Health and Safety (OHS) Clause

### 1. Definitions and Scope

For the purposes of this clause, "hazard" means any source of potential damage, harm, or adverse health effects on something or someone. "Risk" refers to the likelihood of the hazard causing harm. This clause applies to all activities, locations, and parties associated with the execution of this contract.

### 2. Responsibilities and Duties

The Contractor shall ensure a workplace free from recognized hazards and comply with applicable OHS laws and regulations. The Worker shall perform all tasks in a safe manner and adhere to the Contractor's safety policies. The Worker shall also report any unsafe conditions to the Contractor immediately.

### 3. Safety Standards and Regulations

Both the Contractor and the Worker shall comply with [Insert Relevant Safety Standards and Regulations], including but not limited to, the Occupational Health and Safety standards, industry-specific guidelines, and the Contractor's internal safety policies.

### 4. Training and Competency

The Contractor shall provide appropriate OHS training to the Worker prior to commencing work. This includes training on hazard identification, risk assessment, emergency procedures, and the use of personal protective equipment (PPE). The Contractor shall maintain records of all training provided, and the Worker shall participate in all required training sessions.

### 5. Incident Reporting and Investigation

All incidents, including near-misses, accidents, and occupational illnesses, must be reported to the Contractor within 24 hours. The Worker shall cooperate in the investigation of incidents and implement corrective actions as directed by the Contractor to prevent recurrence.

## 6. Monitoring and Auditing

The Contractor reserves the right to conduct regular audits and inspections to ensure compliance with this OHS clause. The Worker shall provide access to all relevant documentation and cooperate with the Contractor's audit team.

## 7. Penalties and Consequences

Failure to comply with this OHS clause may result in disciplinary actions, including termination of employment, financial penalties, or other remedial actions as deemed necessary by the Contractor. The Worker agrees to adhere to all safety protocols to ensure their own safety and the safety of others.

In witness and agreement whereof, the Employer has executed this contract with due process through the authorization of official company agents and with the consent of the Employee, given here in writing.

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Employee Signature

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Date

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Company Official Signature

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Date

## Annex 2: Sample Complaint Form

<b>BOOST YOU Project, GRIEVANCE/COMPLAINT FORM</b>	
<b>Section 1: Complaint</b>	
1.	What harm do you believe the BOOST YOU <b>Project</b> caused or is likely to cause to you or your community? Please describe in as much detail as possible.
2.	What location is concerned with your submission? (Please include Province/District name)
3.	Do you live in the project area?
4.	Have you previously reported your concerns to BOOST YOU ( <b>PIU</b> )? If yes, please provide the details about those communications and explain why you are not satisfied with the action in response.
5.	If known, please list the operational procedures you believe have been violated by the BOOST YOU <b>Project</b> .
6.	Do you expect any form of retaliation or threats for filing this complaint to the BOOST YOU <b>Project</b> ?

## Section 2: contact information

7. Are you filing an individual submission or representing a community?

Individual:  Representing a community:

8. Would you like your name and contact details to be kept confidential? (*BOOST YOU Project*) *will not disclose your identities to anyone without your prior consent.*) Yes   
No

9. Submitter's Name & contact information:

**Name:**

**Address:**

**Email:**

**Phone:**

Preferred Method of Contact:

10. I, the undersigned, request the BOOto investigate the issues described above.

11. Signature/Thumbprint

Name:

Date

NOTES:

- Please attach supporting documents, if available.

**Section 3: Official Use Only**

Grievance ID Number

Recorded by:

Date:

Place/Method grievance was received:

### **Annex 3: Individual CoC in case of contractor**

### **Implementing Environmental, Social Health and Safety (ESHS) and Occupational Health and Safety (OHS) Standards**

#### **Preventing Gender-Based Violence (GBV) and Violence Against Children (VAC)**

I, \_\_\_\_\_, acknowledge that adhering to environmental, social, health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing gender-based violence (GBV) and violence against children (VAC) is important. All forms of GBV or VAC are unacceptable, be it on the work site, the work site surroundings, at worker's camps, or the surrounding communities.

The company considers that failure to follow ESHS and OHS standards or to partake in GBV or VAC activities constitutes acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit GBV or VAC may be pursued if appropriate.

I agree that while working on the project, I will:

- Attend and actively partake in training courses related to ESHS, OHS, HIV/AIDS, GBV and VAC as requested by my employer.
- Shall wear my personal protective equipment (PPE), in the correct prescribed manner at all times when at work or in project-related activities.
- Take all practical steps to implement the contractor's environmental and social management plan (CESMP).
- Implement the OHS Management Plan.
- Adhere to a zero-alcohol policy during work activities and refrain from the use of illegal substances at all times.
- Consent to a police background check.
- Treat women, children (persons under 18), and men with respect regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.

- Not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not participate in sexual contact or activity with children—including grooming or contact through digital media. A mistaken belief regarding the age of a child is not a defence. Consent from the child is also not a defence or excuse.
- Not engage in sexual harassment—for instance, making unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature, including subtle acts of such behaviour, e.g., looking somebody up and down, kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts, making comments about somebody's sex life, etc.
- Not engage in sexual favours—for instance, making promises or favourable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behaviour.
- Unless there is full consent by all parties involved, I shall 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” within the scope of this Code.
- Consider reporting through the GRM (Grievance Redress Mechanism) or to my manager any suspected or actual GBV or VAC by a fellow worker, whether employed by my employer or not, or any breaches of this Code of Conduct.

With regard to children under the age of 18:

- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
- Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium (see also “Use of children's images for work related purposes” below).
- Refrain from physical punishment or discipline of children.
- Refrain from hiring children for domestic or other Labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
- Comply with all relevant local legislation, including Labour laws in relation to child Labour.

## **Use of children's images for work related purposes**

When photographing or filming a child for work related purposes, I must:

- Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
- Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film shall be used.
- Ensure photographs, films, and videos present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file labels do not reveal identifying information about a child when sending images electronically.

## **Sanctions**

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

- Informal warning.
- Formal warning.
- Additional Training.
- Loss of up to one week's salary.
- Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
- Termination of employment.
- Report to the police if wanted.

*I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I shall adhere to the occupational health and safety management plan. That I shall avoid actions or behaviours that could be construed as GBV or VAC. Any such actions shall be a breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein*

*and understand my roles and responsibilities to prevent and respond to ESHS, OHS, GBV and VAC issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to take action mandated by this **Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.***

Signature : \_\_\_\_\_

Printed Name : \_\_\_\_\_

Title : \_\_\_\_\_

Date : \_\_\_\_\_