



LABOUR MANAGEMENT PROCEDURE

for

**ADVANCING SUSTAINABILITY IN PERFORMANCE, INFRASTRUCTURE, AND RELIABILITY
OF THE ENERGY (ASPIRE) SECTOR IN THE WEST BANK AND GAZA**

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1. INTRODUCTION

The Labor Management Procedures (LMP) is developed by PENRA to facilitate planning and implementation as well as manage risks under the Advancing Sustainability in Performance, Infrastructure and Reliability of Energy Sector (ASPIRE), called hereinafter as (the Project), International Bank for Reconstruction and Development/International Development Association called hereinafter (the Association) has agreed to provide financing for the Project. The LMP sets out the Project's approach to meeting national requirements as well as the World Bank's Environmental and Social Framework, Labor and working conditions, ESS2 and Community Health and Safety (ESS4).

The Project's Environmental and Social Assessments including ESMF and Preliminary ESIA, for one of the subcomponents, identified key risks and impact associated with Project implementation, associated with workers as well as community health and safety, and the risk associated with labor impact. The rated environmental and social risk of the Project is **substantial** which indicate a substantial likelihood of adverse impacts associated with project implementation, including risks related to labor. The LMP addresses the labor related risks and provides mitigation measures to minimize those risks.

Project Management Unit (PMU), established at PENRA solely to implement the projects funded by the Association together with existing electricity companies, who will be involved with the implementation of the Projects subcomponents depending on the geographical location of these sub-components. The electricity companies involved includes: Palestinian Electricity Transmission Ltd. Company (PETL), and Distribution Companies (DISCOs), namely Jerusalem Distribution Company (JEDCO), Northern Distribution Company (NEDCO) and Tubas Distribution Company (TEDCO). These companies throughout the Project implementation will evaluate risks and impact and develop procedures to prevent any further risk.

The focus of the LMP is on workers engaged by PENRA, PETL, DISCOs, and contractors to works on the Project components mainly the medium voltage lines, connection points (CPs) and solar systems. Adhering to these procedures, PENRA prepare these specific procedures to be inserted in the contract as part of contractors' legal obligations. The approach will be assessed as part of the initial screening of environmental and social risk and impact carried out by PENRA Project Coordination Unit (PMU).

2. OVERVIEW OF LABOR USE ON THE PROJECT

PENRA was established in 1995, and while efforts to consolidate the sector into distribution companies (DISCOs) began as early as 1997, the Palestine Electricity Regulatory Commission (PERC) was created in 2009.

PETL was created in 2013, as 'single buyer and transmission system operator (TSO)' to bring cohesion in the sector. PETL is the first national government company overseeing the construction and operation of the system and the national transport of electric power, so that represents the only authority to purchase electricity and is transferred to the Palestinian market.

DISCOs' responsibilities include distribution of Palestinian's electricity and balancing electricity supply and demand in order to provide an uninterrupted and reliable power supply in the different geographical areas in the West Bank. DISCOs actively work to develop and improve electricity transmission by reconstructing and maintaining existing transmission lines and by constructing new lines.

Based on the size of the contract and required qualification to carry out design and construction activities of the subproject, PENRA will implement and execute subprojects either through the technical departments in PETL and DISCOs or through bidding procedures, which will select contractor(s) for Supply, Installation and Commissioning of the medium voltage lines, the connection points, and solar systems and meters. It is not expected that the construction contracts will be awarded to international companies.

Number of Project workers:

The exact number of project workers which will be engaged in relation to the Project is, currently, not known yet. The bidding documents for the design Supply, Installation and Commissioning of the medium voltage lines, connection points (CPs), and solar systems have not been yet prepared. The number of workers to be involved in the construction phase has been estimated based on experience gained from the similar projects undertaken in Palestine. PENRA has already implemented medium voltage lines strengthening project and connection points, financed by Ministry of Planning and Finance and other donors, which involves a construction of approximately 60 km long transmission lines and 35 CPs. It is estimated that the approximate total number of workers for the construction of the medium voltage lines would be about 60 to 80 persons, about 50 to 70 for the CPs, and about 30 for the solar systems. It is not expected that any single construction site would ever have more than 30 persons at the time. The main construction crews will be local workers from other parts of the West Bank and Gaza and would include the following:

- Three excavation crew-It is estimated that about 4 to 5 workers would be employed in each crew.
- Three tower erection crews – It is estimated that about 10 workers would be employed in each crew.
- Three stringing crews-About 6 workers would be employed in each crew.
- Three rehabilitation crew-About 2-3 workers would be employed in a crew to restore the disturbed areas as soon as possible after the completion of works of previous crews.
- CPs crews-It is estimated that about 50-70 workers would be engaged in the construction activities.
- Solar system crews-About 30 workers would be employed would be engaged in the construction activities of the solar systems.

Timing of labor requirements:

It is expected that the construction phase of the medium voltage lines would last approximately 6 months, 12 months for the CPs, and 4 months for the solar system. For the whole construction activities of the Project, about twenty percent of the workers will be unskilled laborers, and eighty percent of the workers will be semiskilled and skilled positions such as managers, engineers, forepersons, drivers and equipment operators, and electrical workers. Once the land is cleared and foundations are installed, more skilled labor will install the towers, electrical equipment, and accessories. All semiskilled, skilled and unskilled labor will come from local communities. It is expected that Project will engage the following categories of project workers as defined by ESS2:

Direct workers: Direct workers would likely include project managers, supervisors, technical personnel who are PENRA, PETL, and DISCOs current employees who will be assigned to work on this Project and that 1 new employee would be hired to carry out work in relation to environmental and social safeguard issues; the Environmental and Social Officer (ESO). The estimated number of direct workers would not likely exceed 18-20 staff.

It is expected that direct workers would also include independent consultants, who are specialized in certain disciplines (such as training, supervision, and social safeguards and community relations). These consultants are hired under individual contracts, on part-time basis, with specific definition of the assigned tasks and responsibilities.

Contracted Workers: Contracted workers would be hired under design, supply, and installation contractor(s) for medium voltage lines, the CPs, and solar systems. Given the construction sites are distributed over the entire West Bank, there several separate contracts will be awarded. Each contractor might need engagement of subcontractors. The subcontractors' workforce will be also considered as contracted workers. It is estimated that the Project would engage about 140 and 180 contracted workers.

Community workers: Community workers will not be employed in relation to this Project.

Primary supply workers: Primary supply workers would be engaged by the PENRA's primary suppliers to the project materials such as circuit breakers and switch isolators, wires, protection and control equipment, power-poles, steel products, solar systems, construction materials, etc. Given the project sites are distributed over the entire West Bank and Gaza, there several separate suppliers will be awarded.

3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

Project activities

The Project components include the following subprojects: installation of Jericho – Ramallah 33 kV and Tubas - Nablus 33 kV Medium voltage lines, CPs, and the solar systems. The length of the medium voltage lines is about 40 km involving installation of about 400 towers, rehabilitation and construction of 170

CPs, and installation of approximately 1000 of solar system for health, Micro, small, and medium enterprises (MSMES), and residential sectors. Construction of this type of projects typically includes the following activities:

1. Clearance of right of way;
2. Construction of access roads (wherever required),
3. Land-clearing and construction of foundation;
4. Erection of towers;
5. Stringing of conductors;
6. Demolition of existing electrical rooms and building of new ones, where needed;
7. Installation of electrical equipment and solar systems; and
8. Reinstatement and revegetation of impacted areas.
9. Guidance on installation of new equipment at the battery recycling factories as part of the TA

Key Labor Risks

Key labor risks would be associated with health and safety risks related to the construction activities of medium voltage lines, CPs, and solar systems such as: use of heavy equipment, electrocutions, fall hazards, exposure to noise, dust and sunlight, falling objects, exposure to hazardous materials including heavy metals (lead, mercury, cadmium), exposure to electrical hazards from the use of tools and machinery, traffic accidents, environmental hazards (snakes, wasps, bees, etc.), working on steep terrain, steel erection (towers) hazards and work at heights in the case installation of 33 kV medium voltage lines and roof top solar systems, welding hazards (fumes, burns and radiation). As the construction activities will involve hazardous work, persons under the age of 18 will not be employed by the Project.

The Project is assessed as Low on Gender Based Violence (GBV) risk. The Project will not experience any labor influx issues or issues related to the presence of migrant workers and therefore fear for the dangerous diseases to be spread out to the other workers and community is not expected. However, if other labor risks arise during project implementation, PENRA will develop procedures to prevent further impacts.

There are risks of accidents during the installation. The potential risks that could happen for labor during the implementation of the project are associated to the electric power transmission and distribution activities whether during the construction or the operation of the project can be categorized as:

- Live power lines.
- Excavation of tower foundation
- Working at height.
- Electric and magnetic field.
- Exposure to chemicals.

These risks will be mitigated and reduced by the application to the occupational health and safety guidelines, labor law as well as to the Environmental and Social Standards number 4 (ESS4) and specifically, the health and safety guidelines of the electrical transmission and distribution projects. Moreover, PETL has its own safety procedures.

Even though the activities of the construction and the operation will provide potentials of employment opportunities, the labor influx will not be an issue in the project's locations and related risk minimal. The Jericho Ramallah interconnector will require the workers to come from nearby towns and communities; however, there will be no labor camps. In case any of the associated constructions, once identified, could require labor camps this LMP will be updated to reflect that. With respect to child labor, based on current conditions in the sector it is assessed that the risk of child or forced labor is negligible and managed through national legislation. In addition, given that the workers are mainly from the surrounding communities for the risk of spreading the dangerous diseases are also minimal. These two risks, labor influx and community health, will be revisited once the associated infrastructures are identified.

4. OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

Two major legislations in Palestine govern the rights of the labors and the terms and conditions of the employment are: the Palestinian Labor Law no (7) of (2000) and the Council of Ministers Act 11, 2012 regarding the minimum wage.

The Labor Law no (7) provides the basic conditions of employment with a view of improving the status of employees in Palestine. The Law explains the working hours, wages, leaves, the reward of work end, work contracts etc. The Council of Ministers Act 11, 2012 deals specifically with the minimum wages in the Palestinian National Authority's locations and basic terms and conditions of employment.

Below is the overview of the key aspects of Palestinian Labor Law (No. 07 of 2000), the Council of Ministers Act 11, 2012, and the terms and conditions of work in ESS2, para 11.

Wages

The minimum wage limit is regulated by the Palestinian Labor Law. The specific minimum wages for workers is 30\$/day (3.75 \$/hour) and the minimum wages for employees is 415 \$/month). A labor agreement will determine the form and amount of remuneration. Remuneration will be paid at least once a month.

The insurance made by contractors for the contracted workers will pay compensation to the contracted workers for work-related damage that caused any deterioration to the employee's health and will cover the subsequent, necessary treatment costs.

Deductions from payment of wages will only be made as allowed by the national law, and project workers will be informed of the conditions under which such deductions will be made.

Working hours

The maximum number of hours per day that contracted workers must perform on the project is 8 hours; (Saturday through Thursday) and the allowed work week of 48 hours. For direct workers, the number of hours per day is 7 hours; (Sunday through Thursday) and the work week of 35 hours. The daily working hours shall be reduced by at least one hour in all hazardous or health damaging occupations, in addition to nightly jobs.

Rest breaks

The employees will have one hour meal break each workday taking into consideration that the worker shall not work for more than five consecutive hours. The duration of rest between working days is one day on Friday for contracted workers and two days for direct workers.

Overtime work

The extra working hours should not exceed twelve hours a week. The worker shall be paid the wage of one and a half hour for each extra working hour he/she works.

Leaves

An employee will have the right to enjoy paid leave for at least 21 working days, sick leave of 14 days, and unpaid leave for 14 calendar days per annum. Leave does not include maternity leave which is 70 days. The worker shall have the right to a paid leave on religious and official holidays, which is not considered or counted as annual leaves.

Women

Palestinian Labor Law includes provision for prohibition of discrimination between men and women. Employment of women is prohibited in the following jobs or under the following conditions: dangerous or hard works, extra working hours during pregnancy and during the first six months after delivery, and during night hours except for the works defined by the Council of Ministers.

Labor disputes

Palestinian Labor Law includes provision for workers exemption from legal fees arising from work-related disputes and allows to unionize. A bipartite committee will settle any disputes that may arise from the implementation of agreement. The court has jurisdiction over labor related disputes.

5. OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

The Palestinian Labor Law No. 07 of 2000, the Council of Ministers Act 11, 2012, and PETL's safety procedures provide provisions on occupational health and safety and applies to direct and contracted workers. The following points among others set out in ESS2 will be ensured:

- All potential risks to project workers' health and safety will be identified by all parties who employs workers and develop and implement procedures to establish and maintain a safe working environment, including workplaces, machinery, equipment and processes under their control;
- Contractors will prepare a detailed OHS plan for their correspondent contracts including risk assessment, mitigation measures, method statements and system of monitoring and reporting.
- Appropriate protective measures will be provided. These measures include providing adequate personal protective equipment (PPE) at no cost to the Project workers;
- Contractors will assign health and safety officer at construction sites;
- Project workers will receive OHS training at the beginning of their employment. Training will cover the relevant aspects of OHS associated with daily work, including the ability to stop work without imminent danger and respond to emergency situations. Training records will be kept on file. These records will include a description of the training, the number of hours of training provided, training attendance records, and results of evaluations;
- The contractor will develop and implement reporting system for any accidents, diseases, incidents and near misses. Every incident will be reported to the contractor, investigated and relevant measures will be designed to avoid the incident in the future. Also remedies for adverse impacts such as occupational injuries, disabilities and diseases will be provided.

The Palestinian Labor Law does not include provisions of contractor's grievance mechanism for contracted workers, which may allow workers to communicate their complaints to the employer. This can be considered as a gap between Palestinian Labor Law and ESS2. The contractor will develop and implement grievance mechanism through which workers are able communicate their complaints to the employer/contractor. The grievance mechanism is further discussed in this document (see section 10)

6. RESPONSIBLE STAFF AND PROCEDURES

PENRA in coordination with the responsible parties for implementation of the subcomponents; PETL and/or DISCOs will be responsible for implementing the LMP, as well as reporting back to the Association. The ESO to be hired at PENRA to oversee the implementation of the environmental and social measures across the project will be responsible for the following:

- Implement this LMP to direct workers;
- Ensure that contractor(s) responsible for the construction work prepare their labor management procedure, in compliance with this labor management procedure, and OHS plan before the initiation of the construction work;
- Monitor that the contractor(s) are meeting obligations towards contracted and sub-contracted workers in line with ESS2 and the Palestinian Labor Law;
- Monitor implementation of contractors' labor management procedures;
- Monitor that OHS standards are met at work places in line with OHS plan;
- Monitor training of the Project workers;
- Ensure that the grievance mechanism for the Project workers is established and monitor its implementation;
- Monitor implementation of the workers Code of Conduct.

The Contractors will be responsible for the following:

- Appoint qualified environmental and social expert to prepare and implement project specific labor management procedure, OHS plans, and to manage subcontractor performance;
- Develop labor management procedure and OHS plan which will apply to contracted and sub-contracted workers. These procedures and plans will be submitted to ESO at PENRA or the Supervision Engineering Office for review and approval before the contractors mobilize for the construction phase;
- Contractors will supervise their subcontractors' implementation labor management procedures and OHS plan;
- Maintain records of recruitment and employment process of contracted workers.
- Engage and manage the Project workers;
- Communicate clearly job description and employment conditions to contracted workers.
- Develop and implement workers' grievance mechanism and address the grievance received from the contracted and sub-contracted workers;
- Have a system for regular review and reporting on labor and OHS performance.
- Deliver regular induction on HSE training to employees;
- Ensure that all contractor and sub-contractor workers understand and sign the Code of Conduct prior to the initiation of the work;
- After the bidding process is completed and the contractors are known, the LMP can be updated to include additional details about contractors as necessary.

The Supervision will be carried out by the ESO or by external Supervision Engineering Firm to oversee labor and safety performance daily, on the behalf of PENRA. The ESMP requires the Supervision to employ qualified environmental and social expert for such oversight and to report on environmental and social due diligence to PENRA on a weekly basis.

7. POLICIES AND PROCEDURES

PENRA apply the Palestinian Labor Law (No. 7 of 2000) and the Council of Ministers Act 11, 2012 which provides the rights of employees. This Law will apply to project direct and contracted workers. The direct project workers will sign the project-specific Code of Conduct.

PETL has also its safety procedures which has provisions to ensure that both PETL employees and others can undertake all work, on or near electrical and mechanical equipment safely. The safety procedures in place require PETL staff to use safe methods and procedures for installation, working conditions, and use of personal protective equipment (PPE) during the works on site.

The Contractors will prepare labor management procedures in line with this labor management procedure based on ESS2 and the Palestinian Labor Law. The principles and procedures presented below represent minimum requirements, but are not an exhaustive list of requirements. The employment of project workers will be based on the principles of non-discrimination and equal opportunity. There will be no discrimination with respect to any aspects of the employment relationship, such as recruitment, compensation, working conditions and terms of employment, access to training, promotion or termination of employment. The following measures will be developed by the contractors and monitored by PENRA or the Supervision Engineering Firm who will be hired on behalf of PENRA to ensure fair treatment of all employees:

- Recruitment procedures will be transparent, public and non-discriminatory with respect to ethnicity, religion, sexual orientation, disability, and gender;
- Clear job descriptions will be provided in advance of recruitment and will explain the skills required for each post;
- All workers will have written contracts describing terms and conditions of work and will have the contents explained to them. Workers will sign the employment contract. Terms and conditions of employment will be available at work sites;
- Employees will be informed at least two months before their expected release date of the coming termination;
- The contracted workers will not pay any hiring fees. If any hiring fees are to be incurred, these will be paid by contractor;
- The contracts will be developed in Arabic language;
- In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulties with understanding the documentation;
- PENRA will include in contracts that all contractor (and subcontractor) personnel must be of the age of 18 years or more.

The main health and safety risks will be encountered by the construction contractors' workforce. Contractors bidding for the work will have to demonstrate capability to manage health and safety risk and provide corresponding documentation. After the contract award, the contractors are required to provide the labor management procedures and occupational health and safety plan in line with the ESMP. The contractors will ensure that occupational health and safety plans are implemented by sub-contractors.

PENRA will include into the bidding documents specific OHS standard requirements that all contractors and sub-contractors will meet under the Project. The standards will be consistent with local regulations, WBG EHS guidelines and GIIP (Good International and Industry Practices). The following OHS standard requirements should as a minimum be included in the OHS Plan to be prepared by the contractors:

- Provide a safe workplace and risk Assessment Procedure will be completed before the commence of any construction activities, and safety measures will be implemented in accordance with applicable safety standards;
- Emergency response procedure;
- Fall prevention and working at heights;
- Excavations safety, Ladders safety; welding and cutting safety; cranes and machinery safety; hand tools safety;
- OHS training;
- Present OHS accountability matrix for all staff including Project manager, contract manager, OHS staff, foremen, and all employees with clear roles and OHS responsibilities;
- All Contractors must have its own OHS staff that will be responsible for the implementation and supervision of the OHS program;
- PPEs and other preventive measures will be provided at no cost for employees;
- Bi - weekly OHS meetings will be conducted to discuss preventive measures, deviations and non-compliances, accidents and corrective actions;
- Contractors will conduct internal OHS surveys and audits to verify compliance of OHS practices. Non-compliances will be documented and reported internally. A time frame for a corrective action will be set and followed up. Contractors will document and report to supervision consulting office all accidents and illness with a day lost or more, fatalities or serious injuries that may happen at work site;
- There must be on site resources for first aid and for more serious injuries there must be a pre-approved health facility for medical treatment, as well as appropriate transportation of injured workers;
- Contractors will control the access to the construction site only to authorized people. Workers must be trained to perform hazardous works such as working at heights, confined spaces, welding etc. All workers must complete at minimum an OHS induction to have access to the construction site.

PENRA will include in the contract(s) as requirement for contractors to report on issues such as number of accidents rates, severity rates, number of recurring non-compliances, fatalities and serious injuries; and penalties for non-completion.

PENRA or Supervision Engineering Firm (on behalf of PENRA) will conduct periodic supervision of contractor's OHS performance, including site visits, continuously. These supervisions will cover compliance with above mentioned standards, accidents, recommendations, and progress of ongoing corrective actions

PENRA or Supervision Engineering Firm will review and approve contractors' safety plans and procedures. PENRA will inform the Association promptly about any incident or accident related to the project which has, or is likely to have a significant adverse effect on the environment, the affected communities, the public or workers (labor, health and safety, or security incident, accident or circumstance) as soon as reasonably practicable for regular incidents. For serious incidents, such events can include strikes or other labor protests, serious worker injuries or fatalities, project-caused injuries to community members or property damage, the reporting should be no later than 24 hours. PENRA will prepare a report on the event and the corrective action and submit to the Association within 30 calendar days of the event.

The construction contractor will develop and implement Code of Conduct. He should also submit the Code of Conduct to Supervision responsible parties for review and approval. The Code of Conduct will reflect the company's core values and overall working culture. The content of the Code of Conduct is included in the World Bank Standard Bidding Documents and will include provisions relating to GBV, SEA, and CAE. The contractors will be required to provide monthly report on the performance of labor, occupational health and safety issues which will be reviewed by the Supervision responsible parties.

The contractor should abide to the policies and procedures stated in section 2 above related to non-discrimination with respect to any aspects of the employment relationship, such as recruitment, compensation, working conditions and terms of employment, access to training, promotion or termination of employment. The contractor will prepare, adopt, and implement a stand-alone Security Personnel Management Plan consistent with the requirements of ESS4, in a manner acceptable to The Association.

8. AGE OF EMPLOYMENT

A child under the age of 18 will not be employed or engaged in connection with the Project (This is according to the Palestinian Labor Law No. 7 of 2000, article No. 93; and ESS2 requirements).

The contractors will be required to verify and identify the age of all workers. This will require workers to provide official documentation, which could include a birth certificate, ID's for those above 16, or birth certificates or medical or school record or parents' IDs for those of age 15 to 16. Contractor shall keep the records/documents which will be checked on sites by Supervision Engineering Offices and the District Engineers.

If underage workers are found working on the Project, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner. A regular review and checkup will be conducted by the parties responsible for supervision to make sure no underage workers are still working on the Project.

9. TERMS AND CONDITIONS

As mentioned in section 4, the terms and conditions applying to direct workers are set out in the Palestinian Labor Law No. 07 of 2000 and the Council of Ministers Act 11, 2012 which provide for the rights of employees who will be assigned to work on the project. Terms and conditions of part-time direct workers are determined by their individual contracts. The contractor should provide the workers with the following information:

- Information to workers regarding their terms and conditions of employment including hours of work, wages, overtime, compensation and benefits, holidays, leaves, etc.;
- Provide workers with adequate periods of rest per week, annual holiday and sick leave, as required by national law;
- Ensure Non-Discrimination and Equal Opportunity in the project;
- Set out measures to prevent GBV and SEA in accordance to the ESF;
- Ban the use or support of child, forced or compulsory labor;
- Workers should have signed contracts with clear terms as per the Palestinian Labor law.

The contractor's Labor Management Procedure will be prepared by following this LMP which is consistent with ESS2 and set out terms and conditions for the contracted and subcontracted workers. These terms and conditions will be in line, at a minimum, with this Labor Management Procedure, the Palestinian Labor Law, the Council of Ministers Act 11, 2012, and General Conditions of the World Bank Standard Procurement Documents.

10. GRIEVANCE MECHANISM

In Palestine, the right of the public to complain in Palestine is ensured by the grievance bylaw was approved by the Ministerial Cabinet on 2005 and updated on 2009. The Bylaw sets the rules for grievance of the public and the improving the performance of the Palestinian Ministries and Authorities. However, PENRA does not have a grievance mechanism in place which allows all of its employees to raise workplace concerns.

PENRA's HR Department will develop and implement a grievance mechanism for Project employees to address workplace concerns. This grievance mechanism for the Project workers will be established by Project effectiveness.

The contractor will establish, maintain, and operate a grievance mechanism for Project workers in consistent with ESS2. The mechanism to receive and facilitate resolution grievances. PENRA and contractors will develop a manual for the GRM system. Complaints shall be filed using one of the following methods:

- Electronically. At the following web page: www.penra.pna.ps/ x
- Calling the following Number: 02 2986192 ext.: x
- In person the complainant files a complaint either in person or by completing the forms provided by contractor or put the complaint in a box provided by contractors

The contractors shall be provided within the bidding documents, clear grievance mechanisms for the workers who will be employed or engaged in connection with the Project. The workers grievance mechanism will include: (i) procedure to receive grievances such as comment/complaint form, suggestion boxes, email, and telephone line, (ii) stipulated timeframes to respond to grievances, (iii) a register to record and track the timely resolution of grievances, and (iv) responsible office/department to receive, record and track resolution of grievances.

The contracted workers shall be informed within the training to be provided to them by the contractor, about the grievance mechanism, and how and to whom they can address their complaints, in case they didn't get responses on their complaints from the contractors. Moreover, at work sites there will be clear and understandable grievance procedures and mechanisms written on boards for the Project. Grievance feedback shall be communicated with complainant by telephone, fax, email, or in writing.

The Project workers' grievance mechanism will not prevent workers to use conciliation procedure provided in the Palestinian Labor Law.

11. CONTRACTOR MANAGEMENT

PENRA will use the Palestinian procurement procedures and the Bank's 2017 Standard Procurement Documents for solicitations and contracts which include labor and OHS requirements. PENRA after receiving bids from the contractors ensures that the contractors are legitimate and licensed according to the Palestinian Labor Law, and the Contractors Union.

The environmental and social instruments including ESMF, ESIA, ESMP, SEP, and this LMP form and integral part of the bidding documents to be issued to contractors and shall also be part of the awarded contracts to these contractors. In addition, proper training and orientation to contractors will be made by PENRA at different stages of awarding and implementation of the Project, to ensure full understanding and compliance.

During the process of selecting contractors who will engage contracted workers, PENRA may review the following information:

- Business licenses, registrations, permits, and approvals;
- Records of safety and health violations, and responses;
- Documents relating to a labor management system, including OHS issues;
- Workers' certifications/permits/training to perform required work;
- Accident and fatality records and notifications to authorities;
- Proof of workers' experience and enrollment in related projects;
- Worker payroll records, including hours worked and pay received;
- Enrollment of safety members and records of meetings; and
- Copies of previous contracts, showing inclusion of provisions and terms reflecting ESS2.

Performance of contractors in relation to contracted workers, focusing on compliance with their contractual agreements (obligations, representations, and warranties) will be managed and monitored by PENRA, besides the responsible parties and their assigned resident engineers. Regular supervision checkups will be conducted to ensure environmental and social compliance with the environmental and social instruments and labor management records and reports compiled by contractors. Contractors' labor management records and reports may include: (a) a representative sample of employment contracts; (b) records relating to grievances received and their resolution; (c) reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions; (d) records relating to incidents of noncompliance with national law; and (e) records of training provided for contracted workers to explain labor and working conditions and OHS guidelines and procedures.

12. COMMUNITY WORKERS

As mentioned in section 2, the project may not engage community workers. Community workers are not currently used by PENRA/PETL in any projects due to the specialized labor needs required.

13. PRIMARY SUPPLY WORKERS

The primary suppliers to the Project materials, including cables, electro- mechanical equipment such as circuit breakers and switch isolators, wires, protection and control equipment, power-poles, steel products, solar systems, construction materials, etc. shall be local companies and formal businesses buying materials which subject to high standards from Israel and international companies. These sectors are not known to involve significant risks of child labor and forced labor. In all cases where primary suppliers will be engaged, contractors will be required to inquire during their procurement process whether the supplier has been accused or sanctioned for any of these issues and also their corporate requirements related to child labor, forced labor, and safety.

If there are any risks related to child and forced labor, and safety identified, PENRA will prepare the procedures to address these risks. Contractors will be vetted using a different form which screens the supplier in regard to compliance with taxes, certification, licensing, public liability certificate and

workmen's compensation. A separate form requires that the primary supplier identify the company's permanent staff and declare any current or prior arbitrations as well as any criminal convictions. Suppliers will be subject to regular review.