



# **Palestinian Water Authority**

## **LABOR MANAGEMENT PROCEDURES (LMP)**

**For:**

**Gaza Wastewater Management Sustainability Project (WMSP)**

**Project ID no: P172578**

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## 1. INTRODUCTION

The Labor Management Procedures (LMP) is developed by Palestinian Water Authority (PWA) to manage risks under the Gaza Wastewater Management Sustainability Project (WMSP) called hereafter (the Project). International Bank for Reconstruction and Development/International Development Association called here in after (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 objectives of the Bank's Environmental and Social Framework, specifically objectives of Environmental and Social Standard 2: Labor and Working Conditions (ESS2).

The Environmental and Social Framework (ESF) instruments prepared for the project identified key risks and impact associated with project implementation, associated with workers 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.

PWA is committed on a continuous basis throughout the Project implementation and life to evaluate risks and impact and to develop procedures to prevent further impacts. The focus of the LMP is on workers engaged by PWA and contractors to conduct rehabilitation works within the WMS project associated with the terminal pumping station (TP) and NG WWTP, , upgrade the existing pond #7 and the other random lakes, rehabilitations of the chambers and installation of fittings and instrumentation along the transmission line between TP and the NG WWTP. In addition, the LMP covers the workers who will be involved on the operation and maintenance (O&M) activities of the Project throughout the project life. This LMP will be inserted in the contracts as part of contractors' legal obligations. The approach will be assessed as part of the initial screening of environmental and social risks and impacts carried out by PWA Project Management Unit (PMU).

## 2. OVERVIEW OF LABOR USE ON THE PROJECT

Since the establishment of PWA in 1997, PWA implemented several wastewater projects along Gaza Strip such as wastewater treatment plants, pumping stations and wastewater networks. The Project is developed by PWA, who will implement and execute the Project's activities through bidding procedures, which will select contractor(s) for Supply, Installation and Commissioning. Due to the small size of the contract and available qualification to carry out construction activities, and supply of equipment, the contracts will be awarded to local companies.

It is expected that the Project will engage the following categories of project workers as defined by ESS2:

**Direct Workers:** Direct workers would likely include project manager, operators, supervisors who are PWA 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 environmental and social safeguard issues; the ESO.

**Contracted Workers:** Contracted workers would be hired for design and supervision of construction activities, supply, installation, construction, and commissioning contractor(s).

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

**Primary supply workers:** Primary supply workers would be engaged by PWA's primary suppliers to the project who will supply parts and equipment for O&M on an on-going basis and construction materials for earth works, etc.

Based on the Project Procurement Strategy for Development (PPSD), the project will be implemented into two contracts: (1) procurement of chemicals, consumables, and spare parts required to continue the operation of the North Gaza Emergency Sewage Treatment (NGEST) (Project component 1), (2) procurement of civil works associated with the rehabilitation of existing facilities in the Pond 7 and other adjacent lakes (Project component 2). Moreover, PWA will hire a full staff in accordance with Palestinian Authority Administrative Procedures acceptable to the Association to operate and maintain the NGEST facilities efficiently and effectively.

**Number of workers:** The estimated number of direct workers would not likely exceed 27 from the PMU distributed as follows: 9 employees for operating and maintaining NGWWTP facilities, 9 workers for operating and maintaining TP, and 9 for the Project management.

It is expected that the total number of contracted workers in the contractor crew for procurement (supply and installation) of chemicals, consumables, pumps, and spare parts required to continue the operation of NGEST under component 1 would be 15 persons.

For the second contract (Component 2), it is expected that the total number of contracted workers in the contractor crew for the construction and rehabilitations activities at NGEST facilities would be 30 persons. Therefore, the estimated number of workers during the lifetime of the Project would be 72.

**Characteristics of Project Workers:** The employees/workers, either male or female (mainly the direct workers), will be engaged according to the work needs. Most of the workers will be semiskilled and skilled labors including manual laborers for paintings, carpentry, plumbing, electrical and mechanical installations, managers, engineers, and equipment operators.

**Timing of Labor Requirements:** Based on PPSD and the procurement plan prepared by PWA, the duration of the work in the two contracts is not expected to exceed 18 months.

#### **ASSESSMENT OF KEY POTENTIAL LABOR RISKS**

**Project activities:** Key project activities are associated with the upgrading pond 7, upgrading of the adjacent random lakes, the rehabilitation and upgrading of TPS and NG WWTP and the O&M of the NGWWTP. The works include earth works, removing and dismantling of existing structures and equipment. They also include supply and installation of new pumps, equipment, biogas balloon and monitoring instrumentations on the pressure line.

**Key Labor Risks:** It is assessed that key labor risks associated with the Project are:

- Exposure to rehabilitation/construction risks including noise and dust, falling and falling objects, and exposure to electrical hazards from the use of tools;
- Working at height
- handling solid waste and sludge
- Exposure to wastewater
- Exposure to chemicals such as paints, solvents, lubricants, and fuels
- Traffic accidents
- Excavations hazards
- Lifting of heavy structures
- Environmental hazards (snakes, wasps, bees, etc.
- Welding hazards (fumes, burns and radiation)
- Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Child Abuse/Exploitation (CAE) risks. The risk on this aspect is relatively moderate whereas three main residential complexes are found to the east and south of the site.

Together with this LMP, Environmental and Social Management Plan (ESMP) is prepared which includes a set of mitigation, monitoring, and institutional measures to be taken during construction and operation of the project to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels.

### 3. BRIEF 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) and the Council of Ministers Act 11, 2012 provide the basic conditions of employment with a view of improving the status of employees in Palestine. The Palestinian Labor 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 age***

As the construction activities will involve hazardous work, persons under the age of 18 will not be employed by the Project (This is according to the Palestinian Labor Law No. 7 of 2000, article No. 93; and ESS2 requirements).

#### ***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.

### ***Rest breaks***

The employees will have one hour meal break each workday. The duration of rest between working days is one day on Friday for contracted workers and two days for direct workers.

### ***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.

### ***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.

## **4. BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY (OHS)**

The Palestinian Labor Law No. 07 of 2000, the Council of Ministers Act 11, 2012, and the PWA's OHS apply to PWA employees (direct workers) who are assigned to work specifically in the Project. The same laws will be also applicable to the contracted workers. The following points among others set out in ESS2 and World Bank Group's Environmental Health and Safety Guidelines (EHSGs) 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;
- Appropriate protective measures will be provided. These measures include providing adequate personal protective equipment (PPE) at no cost to the Project workers;

- Contractors are required to prepare OHS plan as part of the Contractor Environmental and Social Management Plan (CESMP); and operators would need to include an OHS plan in the Operation Manual (OM).
- Contractors will assign health and safety officer at construction sites; and the operator will assign a health and safety officer to supervise operation aspects at the TPS, Pond 7, other ponds, transmission Line and NG WWTP. These officers should also implement measures for monitoring compliance and performance on a regular basis.
- 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;
- Project workers will be provided with facilities appropriate to the circumstances of their work, including access to canteens, hygiene facilities, and appropriate areas for rest.
- The contractor will develop and implement reporting system for any accidents, diseases and incidents. Every accident will be reported to the contractor, investigated and relevant measures will be designed to avoid the accident in the future. Also remedies for adverse impacts such as occupational injuries, disabilities and diseases will be provided. Any incident or accident shall be notified immediately by the involved parties to the Bank after occurrence.

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 grievance mechanism is further discussed in this document (see section 10)

- The contractor will develop and implement grievance mechanism through which workers are able communicate their complaints to the employer/contractor.

## 5. RESPONSIBLE STAFF

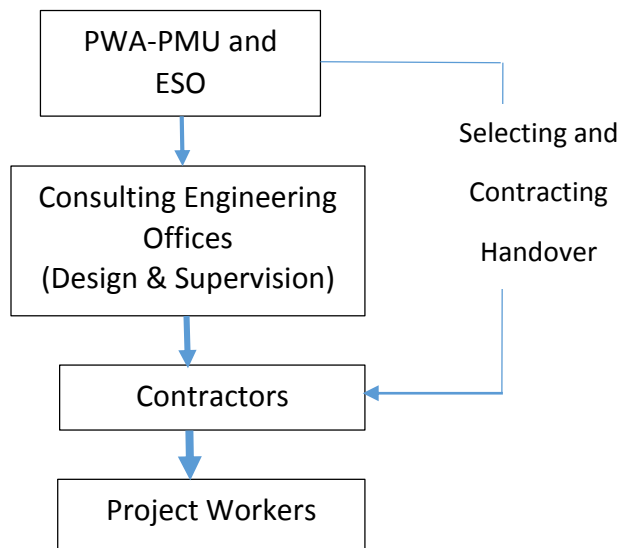
The following table shows the individuals responsible within the project to engage and manage project workers:

Activity	Responsible Staff
Engagement and management of the Project contracted workers	The contractors who will be supervised by the Consulting Engineering Offices and PWA-PMU Engineers, and all shall be reporting to PMU.



Engagement and management of contractors/subcontractors	Consulting Engineering Offices, who will be supervised by PMU Engineers, and all shall be reporting to PMU.
OHS	Contractors as specified in the bidding documents and approved by the Consulting Engineering Offices, ESO and an OHS officer for operation to be assigned to the Project.
Training of workers	The contractor in coordination with the PMU Engineers, ESO, and the Consulting Engineering Offices collaboratively.
Addressing worker grievances	The contractors in coordination with the ESO.

The following chart shows the relationship between the different parties involved in employing or engaging the Project workers



ESO at PWA will be responsible for implementing the overall LMP, as well as reporting back to the Bank. ESO at PMU will be responsible for the following:

- Ensure that contractor(s) responsible for the construction work prepare CESMP, in compliance with this LMP, and OHS plan before the initiation of the construction work;
- Monitor that the contractors are meeting obligations towards contracted and sub-contracted workers in line with ESS2, World Bank Group’s Environmental Health and Safety Guidelines (EHSGs), PWA’s OHS and the Palestinian Labor Law;
- Monitor implementation of 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 OHS Officer for the operation crew of PWA will be responsible for the following:

- Preparation of OHS plan for the operation of the NHWWTP, TPS, Pond 7, other lakes and the transmission line;
- Train operation crew on different OHS aspects related to their works
- Promptly manage any incidents/near misses according to the OM
- Prepare frequent progress reports on the OHS aspects

The Design and Supervision Consultant will responsible for:

- Develop the design of the components of the project
- Supervise and management of contractors' works continuously.
- Oversee labor and safety performance on a daily basis, on behalf of the PWA.
- Employ qualified environmental and social expert for such oversight and to report on the compliance with environmental and social requirements to PWA on bi-weekly basis.

The Contractors will be responsible for the following:

- Appoint qualified environmental and social expert to prepare and implement project LMP, OHS plans, and to manage subcontractor performance;
- Develop LMP and OHS plan which will apply to contracted and sub-contracted workers. These procedures and plans will be submitted to the Design and Supervision Consulting 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.
- Communicate clearly job description and employment conditions to contracted workers.
- Develop and implement workers' grievance mechanism and address the grievance received from the 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.

## 6. POLICIES AND PROCEDURES

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

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 PWA and Supervision consultants 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;
- PWA will include in contracts that all contractor (and subcontractor) personnel must be of the age of 18 years or more.

PWA has health and safety procedures, which cover all construction and operation activities. In construction activities, direct workers are expected to carry out field visits and inspections of construction sites. The health and safety procedures in place require PWA staff to use adequate personal protective equipment (PPE) during the works on site. This include, at the minimum, high

visibility vests, helmets, eye protection, and safety boots. The provision of specific equipment is not required.

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 OHS plan in line with the ESMP and to be included in the CESMP prior to initiating construction works. The contractors will ensure that OHS plan are implemented by sub-contractors.

PWA 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 PWA's OHS, 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 and scaffolders safety; welding and cutting safety; Cranes, and forklifts 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.

Design and Supervision Consulting Engineering Office (on behalf of PWA) 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. PWA 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.

The Supervision Engineering Offices will review and approve contractors' safety plans and procedures. PWA 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) promptly after taking notice of the incident or accident from contractors, but no later than one calendar day from its occurrence. Such events can include strikes or other labor protests, serious worker injuries or fatalities, project-caused injuries to community members or property damage. The details regarding the incident or accident will be provide no later than 48 hours after the initial notification. Root Cause Analysis (RCA) will be submitted no later than 10 days after the initial notification.

The construction contractor will develop and implement Code of Conduct. He should also submit the Code of Conduct to Supervision Engineering Offices 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 quarterly report on the performance of labor, occupational health and safety issues which will be reviewed by the Design and Supervision Consulting Engineering Offices. The contractor should abide to the policies and procedures stated in section 2 above.

## **7. 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). However, according to the Palestinian Child Law article 14 and International labor Organization (ILO) agreement, the child of age under 18 years will not employed.

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, or birth

certificates or medical or school record. Contractor shall keep the records/documents which will be checked on sites by Supervision Engineering Offices.

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 Supervision Engineering Offices to make sure no underage workers are still working on the Project.

## **8. TERMS AND CONDITIONS**

As stated in section 4, the terms and conditions applying to PWA's employees (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.

## **9. GRIEVANCE MECHANISM**

The contractors shall provide 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 Project workers shall be informed within the training to be provided to them by the Design and Supervision Consulting Engineering Offices and the PMU Engineers, 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. During the training workers will be informed about their rights and processes in place to ensure a safe working environment and how to report if they feel unsafe.

## 10. CONTRACTOR MANAGEMENT

PWA will use the Palestinian procurement procedures and the Bank's 2017 Standard Procurement Documents for solicitations and contracts which include labor and OHS requirements. PWA 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 Project's environmental and social instruments; 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 PWA 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, PWA 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 the Consulting Engineering Offices and their assigned resident engineers, besides PWA Engineers. Regular supervision checkups will be conducted to ensure environmental and social compliance with the ESMP, SEP, LMP, and reports compiled by contractors. Contractor's labor management 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.

## 11. PRIMARY SUPPLY WORKERS

The primary suppliers to the Project materials, including parts and equipment for O&M on an on-going basis and construction materials which will be needed for earth works, 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, PWA 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. The primary suppliers to the construction materials are local suppliers and manufactures. These sectors are not known to involve significant risks including child labor and forced labor.