

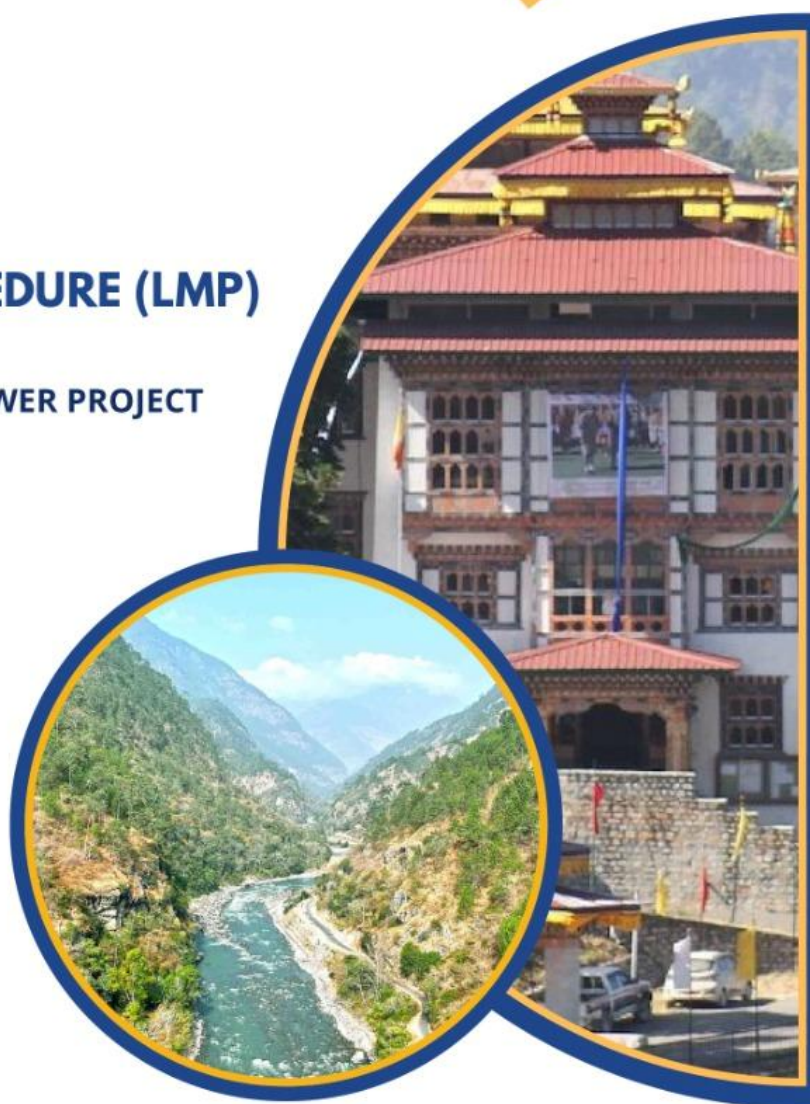


DORJILUNG HYDRO POWER LIMITED

LABOUR MANAGEMENT PROCEDURE (LMP)

**1125 MW DORJILUNG HYDROELECTRIC POWER PROJECT
MONGAR AND LHUENTSE, BHUTAN**

JUNE 2026



ACRONYMS TABLE

CEDAW	Convention on the Elimination of All Forms of Discrimination Against Women
CLDP	Community & Local Development Plan
CCF	Construction Camp Facility
C-ESMP	Contractor's Environmental and Social Management Plan
C-LMP	Contractor's Labor Management Procedures
CoC	Code of Conduct
DHPP	Dorjilung Hydroelectric Power Project
DHPL	Dorjilung Hydro Power Limited
DGPC	Druk Green Power Corporation Limited
DHPS	Department of Hydropower and Power Systems
EBRD	European Bank for Reconstruction and Development
EHS	Environment, Health, and Safety
EHSG	Environment, Health, and Safety Guidelines
ESHSD	Environment, Social, Health and Safety Division
E&S	Environmental and Social
EIA	Environmental Impact Assessment
ESMP	Environmental and Social Management Plan
ESIA	Environmental Social Impact Assessment
ESF	Environmental and Social Framework
ESS	Environmental and Social Standards (of the World Bank)
GBV	Gender Based Violence
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
HIV	Human Immunodeficiency Virus
HRT	Headrace Tunnel
IOSH	Institution of Occupational Safety and Health
IFC	International Finance Corporation
ILO	International Labor Organization
LEAB	Labor and Employment Act of Bhutan
LMP	Labor Management Procedures
MoICE	Ministry of Industry, Commerce and Employment
NEBOSH	National Examination Board in Occupational Safety and Health



MD	Managing Director
OE	Owner's Engineer
OHS	Occupational Health and Safety
OHSMF	Occupational Health and Safety Management Framework
OHSMS	Occupational Health and Safety Management System
PH	Power House
PPE	Personal Protective Equipment
PIU	Project Implementation Unit
RGoB	Royal Government of Bhutan
RP	Resettlement Plan
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SIA	Social Impact Assessment
SEP	Stakeholder Engagement Plan
SPV	Special Purpose Vehicle
STD	Sexually Transmitted Diseases
STIs	Sexually Transmitted Infections
TL	Transmission Line
WB	World Bank
W-GRM	Workers' Grievance Redress Mechanism



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1. Overview of Labor Use of the Project

The proposed Dorjilung Hydroelectric Power Project (DHPP or the Project) a Special Purpose Vehicle (SPV) formed between Druk Green Power Corporation Limited (DGPC), Bhutan and Tata Power Company Limited (TPCL), India is one of the largest infrastructure projects in Bhutan, will be implemented over a seven-year construction period followed by long-term operation and maintenance (O&M). Due to the scale and technical complexity of the dam, Head Race Tunnel (HRT), underground Power House (PH), and associated infrastructure, the Project will require a substantial and diverse workforce across multiple work fronts.

During the seven-year construction period, the Project is expected to employ about 7,102 workers in total. With an annual average of 3,539 workers and peak of 5,926 workers in year 4. In accordance with ESS2, project workers are categorized as direct workers, contracted workers, primary supply workers, and community workers. Most of the project workers will be contract workers. This chapter provides an overview of the number, timing, and characteristics of these workers. The policies and procedures for engagement of these workers and terms of conditions of their employment are described in Chapters 7 and 8, respectively.

1.2 Characteristics of Project Workers

The project will attract a diverse workforce comprising unskilled, semi-skilled, and skilled construction workers from local communities, other regions within the country, and foreign countries. Approximately 88% of the workforce will consist of semi-skilled and unskilled workers, reflecting the labor-intensive nature of the project construction. The workforce is likely predominantly male, with women estimated to represent approximately 5-10% of the construction workforce, primarily in administrative, technical support, and selected non-heavy construction roles. Bhutanese law prohibits workers under the age of 18 from working at construction sites. The project will be managed by qualified professionals and consultants, with contractors and subcontractors handling construction works.

1.2.1 Direct Workers: Direct workers are those who will be hired and paid directly by the DHPL, and the DHPL will maintain a direct contractual employment relationship with the workers, including specific control over the work, working conditions, and treatment of the worker. For DHPL, direct workers will comprise a mix of Project staff, project-based staff, DGPC staff working at the head and site offices in Mongar/Gyalpoching and those deployed as consultants hired under the project. DHPL will have its own service rules that is prepared in alignment to DGPC and shall govern the staff.

The consultants will be engaged by the project to undertake short-period assignments as and when necessary. The consultants will be guided by specific terms of reference and contractual agreements between them and DHPL. At the site level, the project will be implemented by DHPL led by a Chief Executive Officer (CEO) and supported by Chief Operating Officer (COO), Chief Finance Officer, Chief Engineers, General Managers, Executive Engineers, Engineers, Assistant Engineers, Junior Engineers, Supervisors, E&S Manager and team, Finance Officers, Personnel Officers, Liaison officer cum Labor Officer, IT Officers, and office support staff. DHPL will be responsible to implement day-to-day coordination, management and monitoring of the project components.

All the ESS2 requirements, including child and forced labor, and labor and working conditions, will be applicable to direct workers. As per the ESS2 requirements, the direct workers, who will be informed of the workers' grievance mechanism at the time of recruitment, will have access to the grievance mechanism. In addition, the DHPL will take appropriate measures to protect the direct workers from any reprisal for filing complaints.



1.2.2 Contracted Workers: Contracted workers are mainly hired by third parties, which include contractors, subcontractors, brokers, agents or intermediaries, to perform work or provide services related to the core functions of the project, where the third parties exercise control over the work, working conditions, and treatment of the project worker. Contracted workers will constitute the largest labor category and will be employed by main contractors and their subcontractors. The Project is expected to be implemented through one or more major civil works contracts covering the dam, HRT, PH, TL, and associated infrastructure. Each main contractor may engage multiple subcontractors for civil works. The majority of the peak construction workforce will be employed through this contracting structure.

The pool of workers will broadly comprise staff that includes skilled, semi-skilled, and unskilled workers hired by the owner's engineer, contractors, and subcontractors, and they will be deployed once the contracts are awarded. Most of these workers will be involved during construction activities, and their involvement is expected to end when construction works are complete. However, a few skilled and unskilled workers could be maintained beyond construction to facilitate the operation of the plant, take care of the project infrastructures and support skilled workers in maintenance works.

In accordance with Bhutan's Labor and Employment Act and ESS2, the minimum age for employment on the Project is 18 years. No person under the age of 18 will be employed in any Project-related activities. All the ESS2 requirements, including child and forced labor, and labor and working conditions, will be applicable to contracted workers. As per the ESS2 requirements, the contracted workers will have access to the contractor Grievance Redressal Mechanism (GRM). In addition, the contracted workers will be informed of the workers' grievance mechanism at the time of recruitment. DHPL will ensure that the contractor GRM is effective and accessible. Additionally, workers will have access to the DHPL GRM as well. DHPL will require contractors to protect workers from any reprisal for filing complaints.

The DHPL will ensure that third parties that engage contracted workers are legitimate and reliable entities and have in place labor management procedures applicable to the project, allowing them to operate in accordance with the requirements of this ESS2.

1.2.3 Primary supply workers

Primary supply workers who will be hired by the sub-contractors, will mostly be skilled and semi-skilled workers, and most of them are expected to be intermittent and determined based on the need for their services during the project construction. These shall be employed by suppliers providing goods and materials essential to the Project's core functions, such as construction and raw materials, equipment, explosives, training and technical support to direct workers and specialized services. While not directly employed by the SPV or its contractors, these workers form part of the Project's supply chain. The terms and conditions on engagement of primary supply workers are described in Chapter 13. As per the requirement of the ESS2, the DHPL will put in place appropriate measures to mitigate the potential risks of child labor, force labor and serious safety issues, which may arise on related to primary supply workers.

1.2.4 Community Workers

As per ESS2, community workers are individuals who provide labor on a voluntary basis for activities that support project objectives and deliver direct benefits to their own communities. The engagement of the community workers in the DHPP is envisaged in limited activities for the purpose of fostering community-driven development through the implementation of the Community and Local Development Plan (CLDP). Such engagement, if undertaken, will be based on voluntary participation,



informed community agreement, and restricted to non-hazardous activities consistent with ESS2. The terms and conditions of engaging the community workers are described in Chapter 12. Under the ESS2, the DHPL will make sure the implementation of the requirements related to working conditions, occupational health and safety (OHS), and child and forced labor is applicable to community workers. The community workers will have access to the project grievance redressal mechanism (GRM) established under the ESS10 requirement. The DHPL will have meaningful consultations with the interested community workers to appraise them about the terms and conditions of their engagement and obtain free and informed consent from such workers before they are engaged in project works.

1.2.5 Migrant Workers

Migrant workers are individuals who move from either other locations within Bhutan or from countries other than Bhutan to work on the Project. Given Bhutan's relatively small domestic labor pool and the magnitude of the Project, a substantial proportion of the construction workforce will consist of migrant workers. It is estimated that up to 90 percent of contracted construction workers may be foreign nationals, primarily from India. These workers will include skilled, semi-skilled, and unskilled personnel engaged by contractors and subcontractors. Domestic migrant workers from other regions of Bhutan may also be employed. A smaller number of international and national professionals may be engaged under consulting services contracts. The project ESIA estimates that out of around 6,350 workers required during peak construction period, 90% of the workers will be sourced from foreign country, mainly from India.

The Rules and Regulations on Foreign Workers Management, 2024 in Bhutan provides a comprehensive regulatory framework for employing foreign nationals, including the terms and conditions of their employment. Recruitment of migrant labor may occur through licensed recruitment agencies or intermediaries (mostly through contractors or sub-contractors) in accordance with national regulations.

1.1 Number and Timing of Project Workers

1.1.1 Contracted Workers

Construction Workforce

The majority of the construction workforce will comprise contracted workers engaged by the contractors and their subcontractors. These workers will include skilled personnel such as engineers, heavy equipment operators, tunneling specialists, electricians, mechanics, blasting experts, and supervisors; semi-skilled personnel such as equipment assistants, carpenters, steel fixers, and plant operators; and unskilled laborers supporting excavation, material handling, and auxiliary site activities.

The detailed breakdown of skilled, semi-skilled and unskilled labor across major components of the Project is presented in Table 1.1. At peak construction, total workforce demand is estimated at 5926 workers. Labor mobilization will increase progressively during the initial years and decline significantly after Year 5 as major structural works are completed, and commissioning activities commence.

Table 1.1: Number and types of construction labor required for project during construction

Type	Components	Year							Annual (at Peak)
		Y1	Y2	Y3	Y4	Y5	Y6	Y7	
	Access road & bridges	69	50	-	-	-	-	-	69



Skilled	Adit work	11	70	30	-	-	-	-	70
	Dam work	-	20	75	80	80	50		80
	HRT	-	150	200	250	250	200	100	250
	Powerhouse work	-	90	150	229	180	150	100	229
Semi-Skilled	Access road & bridges	200	347		-	-	-	-	347
	Adit work	300	411	200	-	-	-	-	411
	Dam work	-	300	400	515	450	300		515
	HRT	-	700	1000	1350	1300	1000	500	1,350
	Powerhouse work	-	600	800	1100	1000	800	400	1,100
Un-skilled	Access road & bridges	30	43	-	-	-	-	-	43
	Adit work	100	200	150	-	-	-	-	200
	Dam work	-	100	180	233	190	180		233
	HRT	-	400	600	800	750	600	300	800
	Powerhouse work	--	250	450	650	500	450	300	650
Total by Year		710	3731	4235	5207	4700	3730	1700	6,347

Source: DHPP Detailed Project Report, 2024

Consulting Firms

In addition to construction contractors, the Project will engage specialized consulting firms to provide detailed design review, supervision, and environmental and social oversight services. These firms are expected to mobilize approximately 50 professional personnel during peak periods. Although smaller in number compared to construction workers, these personnel are classified as contracted workers under ESS2.

1.1.2 Direct Workers

Direct workers are those employed directly by DHPL. Across preparation, construction, and operational phases, a total of approximately 755 direct workers will be engaged.

During construction, the Project will employ an average of about 238 direct workers annually, with a peak of approximately 466 direct workers in Year 4. These workers will include technical, supervisory, environmental and social (E&S), financial, administrative, and coordination staff.

During the operational phase, approximately 219 permanent personnel will be required for plant operation, maintenance, environmental monitoring, safety management, and administrative support. Most of the direct workers to be hired by the DHPL will come from the support staff that represents 61% of the total direct workers to be engaged in the Year 4, followed by technical staff that will comprise of 38% in the peak construction year. These workers will primarily operate and maintain the hydropower facility, with only a few workers required for periodic maintenance of the access road and transmission line. It is estimated that the operations workforce will be about 50% skilled (e.g., project operators and management), 25% semi-skilled (e.g., facility maintenance staff), and 25% unskilled (e.g.,



primarily housekeeping and general maintenance). The number of works and their timing are given in Tables 1.2 and 1.3.

Table 1.2: Number and types of direct workers

Project Phase	Construction period Year			
	Skilled	Semi-skilled	Un-skilled	Total
Preparation	35	35	-	70
Construction	183	273	10	466
Operation	63	123	33	219
Total	281	431	43	755

Source: DHPP Detailed Project Report, 2025

Table 1.3: Timing of direct workers

Types of workers	Construction period Year							Operation phase
	Y1	Y2	Y3	Y4	Y5	Y6	Y7	
Technical	44	65	147	175	121	60	44	57
Administrative	9	9	9	9	9	9	9	6
Support staff	64	104	236	282	195	97	71	156
Total	17	178	392	466	324	166	124	219

Source: DHPP Detailed Project Report, 2024



2. Assessment of Key Potential Labor Risks

2.1 Project Activities

The DHPP is a 1,125 MW peaking run-of-river hydropower development located in Mongar and Lhuentse Dzongkhags in eastern Bhutan. The Project includes construction of a high concrete dam, headrace tunnel (HRT), underground PH, TL, access roads, and associated ancillary infrastructure over a seven-year construction period, followed by long-term operation and maintenance (O&M).

Project workers will carry out a wide range of civil, mechanical, electrical, hydro-mechanical, environmental, and administrative activities. Construction activities will involve large-scale earthworks, tunneling, working at heights, confined space operations, use of heavy machinery, handling of explosives, installation of electro-mechanical equipment, and establishment of worker camps and support facilities.

Direct workers will primarily perform supervision, contract management, Environmental and Social oversight, financial management, and coordination functions. Contracted workers will undertake the majority of construction-related activities. Primary supply workers will be engaged in manufacturing, transporting, and supplying materials and equipment essential to project implementation.

The major components and activities are summarized below.

Table 2.1: Key Project Components and Activities

Component/Sub-components	Major activities	Category of workers
Component A: Preparatory Works		
Sub-Component A1: Preparatory Works	- Construction/strengthening of bridges and access roads - Diversion/construction access tunnels, and a few adits - Construction of power infrastructure, construction of power lines and associated infrastructures, and - Establishment of housing and office facilities for site staff and contractors.	Direct workers, Contract workers, and Primary supply workers
Component B: Dam, Powerhouse, and Electro-mechanical Works		
Sub-Component B1: Construction of Main Hydraulic Structures – Civil and Hydro-mechanical Works	- Construction of the main dam and coffer dam, and - headrace tunnel (HRT) and associated structures and facilities	Direct workers, Contract workers, and Primary supply workers
Sub-Component B2: Power Generation Facility – Electrical and Electromechanical Works	Construction of the underground powerhouse and switchyard to facilitate power evacuation, among others.	Direct workers, Contract workers, and Primary supply workers

Component/Sub-components	Major activities	Category of workers
Sub-Component B3: Financing Cost During Construction		Direct workers and Contract workers

2.2 Key Labor Risks

Based on the nature, scale, and location of project activities, the DHPP presents significant labor-related risks during construction and operation. These risks are associated with hazardous construction activities, large-scale labor influx, migrant workforce management, occupational health and safety exposure, and working and living conditions in construction camps.

The key labor risks and corresponding mitigation measures are summarized below. A detailed Occupational Health and Safety Management Framework (OHSMF) and a standalone Gender, SEA/SH, and Vulnerability Action Plan (GSVAP) have been prepared for the Project, which set out comprehensive risk-prevention, mitigation, monitoring, and response measures. Accordingly, this section provides a summary of key labor risks and corresponding high-level mitigation measures, while detailed procedures and implementation arrangements are addressed in those standalone documents and in subsequent sections of this LMP.

Table 2.2 describes the key labor risks associated with the project and summary mitigation measures and the detailed mitigation and preventive measures are elaborated in the next chapters.

Table 2.2: Key Labor Risks in the Project

Risk	Description	Mitigation measure
Arbitrary decisions by contractors on Terms and Conditions of employment	- Project workers may not be provided with employment contracts and other related information and documentation that is clear and understandable regarding their terms and conditions of employment. - Workers may not have adequate information for meaningful collective bargaining, leading to discontent among employees and disputes.	- The DHPL will closely supervise the recruitment process and ensure fairness of Employment Terms and Conditions against the applicable and prevailing National legislations and the requirements of the ESS2. - DHPL will directly or through OE and other E&S consultants will review the terms and conditions of employment to ensure they align with the applicable regulations and ESS2 requirement. - DHPL will directly or through OE and other E&S consultants review the wage sheet calculation and ensure that the calculations (like working hours, OT hrs, leave calculation, comp off etc.) are correctly factored in the wage calculation sheet and other documents/ records which feed into the wage calculation sheet. - DHPL will also review that payment slip provided to the workers is provided in a language understood by the workers and clearly mentions aspects like attendance days, absent days, leave, OT, other allowances, deduction, if any. The payment slip will be distributed every month to the workers in presence of DHPL representative.

Risk	Description	Mitigation measure
		• Project workers will be provided an employment contract that is clear and in the local language (Dzongkha), regarding their terms and conditions of employment. • DHPL will ensure that the contractors develop detailed onboarding/ induction material especially focused on terms and condition of employment as per applicable regulations and ESS2 requirement. This will be used for refresher training of the workers from time to time. • All information and documentation must be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur. • Where applicable, project workers will receive written notice of termination of employment and details of severance payments in a timely manner. • All organizations employing workers for the Project will be required to maintain a register documenting all relevant information about the workers, including emergency contact person and their employment conditions, etc. • Refer to Chapter 8 on Terms and Conditions for detailed measures. •
Payment of Wages (underpayment, lack of workers' rights, etc.)	• The rights of workers under the national Labor and Employment Act, which will include any applicable collective agreements, may be abused. • Workers' regular and overtime payments may be delayed, irregular, or underpaid.	• Project workers will be paid on a monthly basis as required by national law and labor management, with the principle of "equal pay for equal work". • Workers will be paid overtime as per applicable regulations. For night work, besides the normal day shift, workers will be paid an additional 50 % over the normal rate of pay for the number of hours worked. • DHPL will require equivalent requirements and non-compliance remedies in contractual agreements with subcontractors. • Overtime will only be permitted within the limits provided by law. Overtime hours will be duly recorded and monitored to ensure that it does not exceed permissible limits and payment is made as per law. • All project workers will be provided with adequate periods of rest per week, annual leave and sick leave, as required by national law. • Various policies and procedures will also ensure that workers are paid and treated fairly, including in relation to overtime.

Risk	Description	Mitigation measure
		Refer to Chapter 8 on Terms and Conditions for detailed measures.
Poor Working and Living conditions (substandard camp conditions)	- Construction Camp Facilities (CCFs) may be poorly managed, inconducive for workers, insecure, with poor sleeping conditions, and lack of access to basic amenities like water, toilets, healthcare etc. - Poor sanitary conditions can lead to health impacts on workers and the community. - Bad general appearance of the camp making camp life unpleasant.	- Contractor shall establish Construction Camp Facilities in compliance with IFC/EBRD Guidance Note: “Workers’ Accommodation: Processes and Standards” (2009) - The DHPL will monitor the Construction Camp Facilities to ensure workers have appropriate living quarters (without overcrowding), adequate sanitation facilities separate for male and female, access to potable drinking water, health care and waste management, security, recreation, lighting, security, cooking place, adequate bedding (bedsheet/pillow), storage, shelves and space for keeping dirty clothes/PPEs, mosquito nets (if required), clothes washing facility, dining area, etc. The camps will be constructed in locations with adequate slope stability and structural stability. - Ensure that camps and common areas are routinely cleaned, maintained and organized with appropriate signage. - DHPL will directly or through OE and other E&S consultants monitor the accommodation camp at regular frequency (weekly/ bi-monthly/ monthly) and ensure that gaps, if any are immediately brought to the attention of the contractors and addressed in a time-bound manner. DHPL will have provision for tracking the closure of these gaps. - Refer to Chapter 9 for detailed measures
Discrimination and unequal opportunity	- Decisions relating to the employment or treatment of project workers may discriminate against certain classes of workers including women and vulnerable groups. - Payment of workers may be based on discrimination e.g.; male may be paid higher than women for equivalent position and skills level.	- The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment, hiring, and compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices. - DHPL will safeguard the interests of women and girls, including gender parity at the workspace, appropriate sanitation facilities at workplace and appropriate PPEs for women. - Refer to Chapter 6 for detailed measures
Sexual Harassment	There are significant risks of sexual harassment due to the	The Project will have a zero-tolerance policy in relation to sexual harassment.

Risk	Description	Mitigation measure
	large number of male workers (inc. foreign workers mobilized at the site for extended periods). Risks of sexual harassment concern male and female employees and female, male and children from the local communities.	- The Gender, SEA/SH and Vulnerability Action Plan (GSVAP) prepared for the project includes the establishment of a Gender Focal Point in the DHPL. The Gender Focal Point should be a female employee selected as focal point for reporting incidents of harassment; alternate or secondary focal points should be identified in case the accused is the focal point. - Training administered to female employees should include protocols on how to deal with sexual harassment and GBV cases. - The Code of Conduct shall be signed by all workers. - Mandatory SEA/SH training shall be conducted. Sanctions for violations shall be clearly defined. - The Worker GRM shall include confidential SEA/SH reporting mechanisms.
Child Labor	- Although minimal, there is a risk that children, below the age of 18 could be used as Labor in the project. - Under aged persons within the community may disguise as above 18 to gain employment.	- The minimum age of eighteen (18) will be enforced at recruitment and in Contractors daily staff team discussions. - Contractors will check with employees and liaise with authorities to attest to the age and conduct of all local employees and maintain a register. This will be done by using legally recognized documents such as the National Identity Card, Birth Certificate, or Health Card. - DHPL will also supervise this through the Contractor Management Checklist. This will also be done for all the workers and will include details of the workers information along with ID contact details in case of emergency and this information will be periodically updated. - Refer to Chapter 7 for detailed measures
Forced Labor	Although minimal, there is a risk that there could be involuntary or compulsory Labor, such as indentured Labor, bonded Labor, or similar Labor-contracting arrangements.	- Contractors will ensure that no forced Labor exists in the project by gathering documents and appropriate evidence. - A consent section will be part of the employee signed employment contract. - Contractors will ensure that if labor is sourced from any sub-contracting agency, the workers are not subject to coercion and forced labor conditions. - Contractors will undertake random audit of supply chain workers. - Retention of passports or ID documents shall be prohibited.

Risk	Description	Mitigation measure
		- Recruitment shall be transparent and free of fees to workers. - Refer to Section 6.1.3 for additional details
Labor Influx	- Please refer to the ESIA section 10.3.3.6 wherein a detailed assessment of these impacts, including public health, gender-based violence, unrest, disruption to tangible and intangible heritage, disruption of social links, etc. - Some of the most significant impacts relate to increase in STIs/STDs, HIV/AIDs due to workers on site, increase in GBV/SEA/SH especially for girls being exposed to contractors, sexual relations between contractors and minors and resulting pregnancies, encouragement of sex workers in the project communities. - There is also a range of impacts related to disruption to local, social, and cultural dynamics such as the risks of social conflict, increased burden on and competition for public service provision, local inflation of prices, and increase in traffic and related accidents due to influx of additional population.	- Maintain Labor relations with local communities through a Code of Conduct (CoC). - The Code of Conduct must be signed by all categories of workers. Workers must be trained on the provisions of the CoC about refraining from unacceptable conduct toward local community members, specifically women and informed of the sanctions for non-compliance. Training must be conducted for all new workers, including sub-contractors. - Contractors should provide recreational facilities in the camp and closely monitor and control workers-communities interactions. - It is recommended to consider semi-closed camps (facilities or areas that are partially restricted in access). - Specific requirements to manage risks associated with labor influx (Public health, gender-based violence, SEA/SH, unrest, disruption to tangible and intangible heritage, disruption of social links, etc.) will be managed through contractual requirements, code of conduct and training set out in this document.
Community Health and Safety	- Risk of diseases being borne and spread from the to the community or vice-versa - Risk of local community members being impacted in various ways, including potential accident and injury	- Refer to the Project's ESMP Section 3.2 Pre-construction stage mitigation plan requiring a contractors -ESMP with specific Action Plans including SP 20 Communities Health and Safety Management Plan - Organize periodic community health and safety awareness activities in collaboration with local Gewogs - Liaise regularly with the local health authority, particularly Mongar Regional Referral Hospital, to monitor and identify any increasing trend in water borne or other types of disease incidence.

Risk	Description	Mitigation measure
		• Includes potential diseases vectors in the aquatic biodiversity monitoring (BMP) • Implement reservoir demarcation and signage around the risk zone and along the maximum flow level contour line. • Organize periodic community awareness activities for the downstream communities about the potential impacts due to alter in waterflow level during operation and install signage with warnings and timing of alter in water level. This will be as per the SEP of the Project and documented in the periodic monitoring report. • Install temporary signage informing local communities about the upcoming reservoir filling at least 1 month prior to first impoundment. • Undertake onsite patrols on land and on water during impoundment to directly identify persons being exposed, warned or rescue them. This measure would be coupled with the similar actions targeting fauna being trapped and drowning. • Develop and implement a Reservoir Impoundment Plan.
Increase in demand for local services such as health facilities and local produce	• Labor influx of workers and additional population (“followers”) to the project site may cause burden on and competition for public services such as transport, health, education, among others, resulting in decline in the quality of basic services. • The rise in demand of goods and services due to labor influx may cause a price rise in the local market, causing financial burden to the locals.	• Manage and provide basic services, such as health and within the labor camps and transportation between the labor camps and worksites. • Assess the existing capacity of the local service providers and prepare a plan to enhance the service delivery capacity of the service providers to enable them to cope with the increased service demand. • Enhance the local capacity in vegetable and dairy produce by providing skill training to locals to meet increased local demand.
Discipline and Termination of Employment	• Unfair dismissal and unfair disciplinary actions (whether based on real or perceived issues) can lead to tensions.	• Disciplinary process should be laid out before commencement of work and explained to every worker. DHPL should periodically review workers disciplinary and termination processes to ensure that they are executed fairly and without prejudice. • Where unfair treatment is established, DHPL should put in place corrective action and follow up to ensure appropriate resolution.

Risk	Description	Mitigation measure
No Grievance redress mechanism for workers	Workers may be aggrieved due to unfair treatment, poor working conditions, conflicts, poor pay, over-stretched working hours amongst other things.	- Contractors shall develop and implement a Workers Grievance Redress Mechanism (GRM) defined to handle workers grievances in a fair and timely manner. - A workers GRM will be designed to address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language they understand, without any retribution, and will operate in an independent and objective manner. - The grievance mechanism will not impede access to other judicial or administrative remedies that might be available under the law. - DHPL shall provide oversight to ensure effective implementation of the GRM. This will include adequate disclosure of the GRM, awareness among the workers, accessibility of GRM, process of recording, tracking and redressal of grievances within stipulated time frame (7 days to 15 days). Acknowledgement of grievance and status update to workers in case the redressal is delayed will also be monitored. DHPL will monitor the records associated with GRM implementation for each of the contractors. - In case of grievance related to unfair deduction of wages, (e.g. payment deduction for PPE replacement before due replacement time, or deduction for mandatory leave etc.), GMRL will ensure that contractors refund the deducted amount, and evidence sought from the contractors. - In any case, the workers will have access to DHPL GRM. - Refer to Chapter 10 for details on W-GRM process
No Right of Association and Collective Bargaining	- Workers have the right to freely form, join or not join an Association for the promotion and protection of the economic interests of workers. - Workers have a right to organize collective bargaining and representation.	- DHPL will ensure that workers are informed of their right of/freedom of association and collective bargaining. - DHPL should also inform workers of their GRM and their right to use it.
Primary Suppliers	Primary suppliers could also have occupational injuries, incident/accidents while	Primary suppliers should maintain records related to occupational injuries, illness, lost time and



Risk	Description	Mitigation measure
	performing project related functions.	accidents, which should be reviewed by the contractor on a quarterly basis.
No proper Contractors' Management	Poor documentation of contractual arrangements and labor conditions.	- Documents should be kept at the site office with the site engineers and DHPL office. This includes Workers Register, Records of Accidents/incidents and corresponding cause analysis, Records of strike actions, and Records of grievances, records as per applicable regulatory requirement, records of attendance/ overtime/ leave and wage payment, any other documents related to worker wages and benefits, worker accommodation, worker canteen/ food services, PPE and other records, as required related to ESS2 requirements. - DHPL and DGPC team from the head office, E&S consultants, internal and external auditors (as appointed by DHPL) should check these records during monitoring visits.
Hazardous construction activities	- Workers will be exposed to high-risk activities, including - Tunnelling in confined spaces (HRT) - Road Accidents - Electrical Hazards. - Falls and Trips Hazards. - Hazardous Materials (blasting with explosives) - Working at Height. - Confined Space. - Crane and moving heavy equipment. - These activities carry risks of falls, electrocution, entrapment, vehicle collisions, explosion incidents, and serious injury or fatality.	- Refer to OHSMF for detailed measures. - Contractors shall prepare and implement comprehensive Occupational Health and Safety (OHS) Plans in accordance with national legislation, OHSMF and the World Bank Group EHS Guidelines. - OHSMP will include Hazard Identification and Risk assessment (HIRA) of all activities. The identified risks will be mitigated in the order of preference "Hierarchy of Controls,": - Elimination: Removing the hazard entirely (e.g., redesigning to avoid working at height). - Substitution: Replacing dangerous materials or processes with safer ones (e.g., using low-VOC paint). - Engineering Controls: Isolating people from the hazard (e.g., installing guardrails, machine guards). - Administrative Controls: Changing the way people work (e.g., training, SOPs, safe work procedures, Job Safety Analysis - JSA). - Personal Protective Equipment (PPE): - On a regular basis, the contractors will - Formally record the chosen control measures and responsible personnel in the HIRA register. - Develop Method Statements: Incorporate HIRA findings into detailed Method Statements or Safe Work Procedures (SWP) for the specific activity.



Risk	Description	Mitigation measure
		○ Communication & Training: Conduct Toolbox Talks or safety briefings to inform workers of the specific hazards and the controls in place. ○ Permit to Work (PTW): Issue a PTW for high-risk activities (e.g., confined space, hot work) based on the HIRA findings ● DHPL and its representative, and the contractors will regularly inspect the site to ensure controls are functioning and effective, updating the HIRA if work conditions change. ● Full-time OHS officers commensurate to the scale of work to adequately manage OHS impacts shall be deployed at each major site. ● Every work site will have emergency prevention and preparedness and response arrangements for emergency situations. The contractor level emergency prevention and preparedness plan will finally feed into DHPL project level emergency preparedness and response plan (EPRP). ● Workers shall receive mandatory induction and periodic refresher training. DHPL will monitor these trainings and suggest improvement as required. ● Contractors should provide adequate PPEs for all their workers based on PPE matrix and job hazard analysis of the activity, and the contractors OH&S officers should enforce compliance. ● Maintain a safe working environment including workplaces, machinery, equipment and ensure processes under their control are safe and without risk to health, including the use of appropriate measures to counter chemical and physical substances and agents. ● The OHS performance with details on manpower, work hours, nearmiss, incident, accident, fatality, tool box talk, incident report, root cause analysis report etc, will be included in the contractor report to DHPL, ● The OHS practices at site will be monitored through DHPL ongoing monitoring (daily/weekly), internal monitoring (monthly to start with) and external monitoring at defined frequency (quarterly) ● Emergency preparedness and response plans shall be established for tunneling, blasting, fire, flooding, and other high-risk scenarios. Mock drills and emergency evacuations drills will be conducted at agreed intervals.

Risk	Description	Mitigation measure
		Incident reporting and investigation procedures shall be implemented.
Occupational Health and Safety	- OH&S risks resulting from: - Road accidents. - Electrical Hazards. - Falls and Trips Hazards. - Hazardous Materials. - Working at Height. - Confined Space. - Crane and moving heavy equipment.	- Refer to OHSMF for detailed measures. - Contractors should comply with National OHS regulations and WBG EHS Guidelines. - Contractors should provide OHS training for all workers before commencement of work and periodically. - Every site will have emergency prevention and preparedness and response arrangements for emergency situations. - All contractors should have full time OHS officers on their team. - Contractors should provide adequate PPEs for all their workers, and the contractors OHS officers should enforce compliance. - First aid facilities should also be provided at construction sites. - Maintain a safe working environment, including workplaces, machinery, equipment and ensure processes under their control are safe and without risk to health, including the use of appropriate measures to counter chemical and physical substances and agents.

3. Brief Overview of Labor Legislation: Terms and Conditions

3.1 Regulatory Framework

The Constitution of The Kingdom of Bhutan: The Constitution of the Kingdom of Bhutan, promulgated in 2008, ensures guarantee of the fundamental rights for workers, such as the right against exploitation, right to a clean and healthy environment, rights to fair labor practice, including appropriate remuneration, facilities, and contributory social security, the rights of the child, including prohibiting the engagement of children in factories, mines, or any hazardous work, and the right to social security of different categories of marginalized communities and individuals. The constitution also guarantees the right against discrimination, including a prohibition on discrimination by the State on grounds such as caste or tribe, right to equal pay for work of equal value for Bhutanese citizens, right to form associations and engage in lawful collective activities and says that the state shall not discriminate against any citizens on the grounds of caste or tribe. Similarly, per the Fundamental Rights guarantees by the constitution of Bhutan, a Bhutanese citizen shall have the right to equal pay for work of equal value. The Principles of State Policy of the constitution says that the state shall endeavor to ensure the right to work, vocational guidance and training and just and favorable conditions of work. It further states that the country shall endeavor to take appropriate measures to eliminate all forms of discrimination and exploitation against women, including trafficking, prostitution, abuse, violence, harassment and intimidation at work in both public and private spheres. As per the spirit of the constitutional provisions, the labor administration in the country is guided by Labor and Employment Act of Bhutan (LEAB) 2007, Ministry of Industry, Commerce and Employment (MoICE) through the Department of Labor (DoL). The Kingdom of Bhutan has issued subsequent regulations, such as

- Labor and Employment Act of Bhutan (LEAB), 2007
- The Constitution of the Kingdom of Bhutan, 2008
- Regulations on Working Conditions, 2022
- Regulation on Occupational Health, Safety and Welfare, 2022 (relevant where terms and conditions intersect with welfare provisions)
- Rules and Regulations on Foreign Workers Management, 2024

3.1.2 Other Key Labor Regulations

A brief description of each of the key labor regulations in the country is given below:

- **Labor and Employment Act of Bhutan (LEAB) 2007:** The LEAB 2007 is the primary legislation governing employment relationships in Bhutan. It applies to all enterprises employing workers in Bhutan, including Bhutanese and foreign nationals. The Act establishes minimum standards relating to: Written contracts of employment; Wages and wage payment procedures; Working hours and overtime compensation; Leave entitlements; Termination and notice requirements; Prohibition of forced labor; Prohibition of child labor; Non-discrimination in employment; Freedom of association and collective bargaining; and Workplace grievance procedures.
- **Regulation on Working Conditions, 2022:** The Regulations on Working Conditions provide detailed implementation guidance under LEAB 2007. Standard working hours; Overtime limits and premium rates; Minimum leave entitlements (annual leave, sick leave, casual leave, maternity leave); Rest periods and meal breaks; Public holidays; Termination procedures and payment of dues; Workplace grievance procedures; and Prohibition of hazardous work for minors.



- **Rules and Regulations on Foreign Workers Management 2024:** These regulations ensure that foreign workers employed in Bhutan are subject to the same labor protections as national workers. They regulate: Approval procedures for recruitment of foreign workers; Work permit categories and validity; Employer responsibilities for foreign workers; Mandatory insurance coverage; Medical examination requirements; and Code of conduct provisions for foreign workers.

3.1.3 Summary of Key Labor Provisions on Terms and Conditions of Employment

Key labor provisions under LEAB 2007, Regulations on Working Conditions (2022), OHS Regulations (2022), and Rules and Regulations on Foreign Workers Management (2024) relevant to the terms and conditions of employment:

- **Prohibition on forced labor and employing children:** Section 6 of the Act prohibits forced or compulsory labor and says that no person shall make use of, cause or permit any form of forced or compulsory labor that is extracted under the menace of any penalty and for which the person has not offered himself or herself voluntarily. Similarly, Section 9 prohibits child labor, and says that no person shall subject a child to any form of practices such as sale and trafficking, debt bondage, forced or compulsory labor including sale and trafficking, debt bondage, and forced or compulsory labor. Section 255 of the Regulation on Working Conditions (2002) prohibits employment of children between the ages of 13 to 17 years in hazardous activities, including construction, mining and quarrying, cement manufacturing, heavy labor and lifting, and other dangerous works. In addition, Section 7 of the Regulation on Occupational Health and Safety for the Construction Industry (2022) prohibits the employment of persons under 18 years in construction activities.
- **Non-discrimination and Equal Pay:** Section 11 of the LEAB 2007 prohibits an employer or an employee from discriminating against employees or job applicants on vacancies in connection with recruitment, dismissal, transfer, training and demotion. Section 85 prohibits the employer from terminating a contract of employment based on the employee's race, color, sex, marital status, pregnancy, religion, political opinion or social origin. Section 13 reinforces the principle of equal pay for work of equal value.
- **Employment contract is mandatory:** Section 55 of the Act states that an employer is required to provide an employee with work during the contracted period, and Section 61 of LEAP 2007 requires that an employer ensure that a contract of employment with an employee employment contract to be in writing and a copy of it is provided to the employee. Similarly, Section 64 specifies that the contracts should include the duration, a specific task to be performed, notice period for termination of the contract, wages, working hours, probation period and leave provisions, among others. Section 68 specifies not less than 30 days as the notice period for termination of a contract of employment, and Section 82 provides for termination of the contract by either party with a notice of 30 days.
- **Work Hours and Overtime:** Section 161 of the Regulations on Working Conditions 2022 states that standard working hours must not exceed 8 hours per day and 48 hours per week, except where workers have agreed to perform. As per Section 163, Overtime hours must not exceed 12 hours per week, in addition to standard working hours, and the employer is required to pay an additional 50% of the worker's normal rate of pay for the number of overtime hours worked.
- **Workers' insurance:** Section 32 (5) of the Rules and Regulations on Foreign Workers Management 2024 makes the employer employing foreign workers responsible for ensuring a



foreign worker is covered under the appropriate workers' insurance scheme(s). Insurance schemes for workmen compensation covers deaths or injuries/disabilities suffered by employees arising out of and in the course of employment. The Group Personal Accident is the minimum baseline policy (Nu. 200-300 per worker per year for a compensation amount of). It covers accidental death, permanent/partial disability and insurance amount of Nu.1000,000-300,000; for high risk workers from 300-800 per worker per year with the insurance sum ranging from Nu. 300,000-1million

- **Minimum age:** Section 7 of the Regulation on Occupational Health and Safety for the Construction Industry says that no person shall employ any person under the age of 18 for any construction activities.
- **Labor inspection:** : Section 26 has a provision of recruiting an officer from the Royal Civil Service from Bhutan to advise and inform employees and employers about their rights and obligations under this, facilitate the implementation of this Act by providing information to workers out of contracts of employment, and investigate and, when necessary, act in accordance with this Act and regulations to deal with alleged contraventions of this Act, among others. Similarly, Section 27 defines the power of labor inspector that authorizes the labor inspector enter at reasonable times any factory, plant or establishment, construction site or other areas, workplace or environment to inspect and investigate any such place of employment and all pertinent conditions, structures, machines, apparatus, devices, equipment and materials therein, and to question privately any such employer, owner, operator, agent or employee if the Labor Inspector believes that conditions likely to endanger employees exist.
- **Medical Examination:** Section 21 of the Rules and Regulations on Foreign Workers Management 2024 requires the employer or any Foreign Workers Recruitment Agent recruiting a foreign worker to adhere to the medical tests and examinations prescribed by the Ministry of Health.
- **Provisions for rest periods and breaks:** Section 170 of the Regulations of Working Conditions says that though the actual duration and timing of rest and meal breaks can be varied by agreement between the employer and employees, it should not be less than 30 minutes per 8-hour period. It further says that the employee is entitled to a meal break of 30 minutes after 4 hours of work and a rest break of 10 minutes after 2 hours of work.
- **Wage determination:** Section 70 authorizes the National Minimum Wage Committee under the Ministry of Labor and Human Resources to fix or adjust the National Minimum Wage(s) through an executive order in consultation with the government, employers and employees. Similarly, Section 76 provides seven criteria for fixing the wages, and once fixed, the National Minimum Wage(s) shall remain in force until revised.
- **Equal pay for equal work:** Section 13 of the Labour and Employment Act 2017 prohibits discrimination regarding pay conditions and reiterates equal pay for equal work or work of equal value.
- **Construction activities:** Section 318 of the Regulation on Occupational Health and Safety for the Construction Industry, 2022 states that the blasting operations shall be conducted during daylight hours.
- **Provision for employing foreign workers:** Section 6 of the Rules and Regulations on Foreign Workers Management 2024 allows the recruitment of a foreign national for employment in the Kingdom of Bhutan only after approval from the Chief Labor Administrator. Section 5 provides five approaches for the employment of foreign workers under professional and non-professional categories. Section 16 sets minimum age of 18 as one



of the requirements for foreign workers, Section 17 requires work permit approved by the Department of Labor shall approve applications for foreign nationals, and Section 18 categorizes work permits into regular work permit (R), short-term work permit (S), work permit for border town foreign workers (B), and hourly work permit (H), among others and Section 18 includes a provision of issuing the work period for a maximum period of one year. Section 38 allows the initiation of renewal of work permits for foreign worker of types “R” and “B” at least 14 calendar days before the expiry of their validity. Section 26 allows the recruitment of a foreign worker either through Foreign Worker Recruitment Agents or directly by the employer. Similarly, Section 48 defines the Code of Conduct and Ethics for foreign workers.

- **Leave Entitlement:** Section 174 of the Regulations on Working Condition, annual leave of minimum of 18 working days per year (Section 181), sick leave of 5 working days per year (Section 188, casual leave of 5 working days per year (Section 196), minimum maternity leave of 2 months paid maternity leave (Section 202). In addition, an employee is entitled to a minimum of 9 public holidays each year (Section 218).
- **Weekly off:** An employee shall have a weekly rest period of 1 (one) day.
- **Termination or demobilization of workers:** Bhutan’s labor laws provide provisions for termination of a labor contract, such as Section 68 of the Bhutan labor and Employment Act 2007, which requires at least a 30-day notice to the employee for the termination of the contract. Similarly, Section 186 Regulation on Working Conditions, 2022 says that on termination of contract of employment by either party, including dismissal or redundancy, the employer shall pay to the employee the unused annual leave at the normal rate of pay. However, the laws remain silent on the demobilization of the works once a project is complete.

3.2 Alignment and Gaps with key requirements of the ESS2: Terms and Conditions

Bhutan’s legal framework exhibits significant alignment with the Bank’s Environmental and Social Standards on Terms and Conditions of the ESS2. Gaps are mostly procedural and capacity issues.

Table 3.1: Gaps and alignment of Bhutan’s Labor Laws with ESS2 requirements

Key ESS2 requirements	Gaps/alignment	Provision in the national regulatory framework
Consideration of labor and working condition standards at the planning/proposal stage. Not supported No provision for consideration of labor standards during project planning.	Not aligned	No provision for consideration of labor standards during project planning. While the Labour and Employment Act of Bhutan 2007 does not explicitly require the preparation of a Labour Management Plan (LMP), the Act and associated regulations establish comprehensive provisions relating to employment conditions, occupational health and safety, worker welfare, grievance management, non-discrimination, and labour rights.
Coverage of (a) direct workers	Aligned	Bhutan’s legal framework covers all workers hired in the country, including domestic

Key ESS2 requirements	Gaps/alignment	Provision in the national regulatory framework
(b) contracted workers (c) primary suppliers (d) community workers (e) special provisions for each type of worker.		workers. However, it does not distinguish between types of project/ establishment workers. The establishment/project is responsible only for complying with the law regarding its own direct workers, and not the workers of third parties. Making projects responsible to third parties and suppliers, however, is unnecessary from the country's perspective, as they are subject to the same country's laws. Special provisions for community volunteer work, however, may be needed for community-based development projects.
Labor Management procedures and plans were submitted and vetted during project planning.	Not Aligned	Not mandated for any proposed establishment or project. The law requires any enterprise with at least five employees to prepare internal Service Rules that spell out the terms, conditions, and rules of employment, and the DoL must approve them before they are enforceable. However, this is a separate requirement and not linked to planning and vetting of proposed projects under the EIA system. This LMP addresses the gaps in this requirement. All companies have service rules which should be shared with the DHPL before starting the work or as part of the contracting process.
Minimum age for employment	Aligned	Section 7 of the Regulation on Occupational Health and Safety for the Construction Industry says that no person shall employ any person under the age of 18 for any construction activities.
Compliance monitoring.	Aligned	Monitoring for compliance with labor laws is a mandated function of the DOL
Prohibition of use of child labor	Partially aligned	All forms of child labor are prohibited by section 9 of the LEAB 2007. But Bhutan's minimum age for non-hazardous work is 13, and only if they are the breadwinners of the family. Bhutan's minimum age does not meet the ESS2 standard of 14. However, the Regulation on Occupational Health and Safety for the Construction Industry, 2022, bars employers from recruiting any employee under 18 in the construction industry.

Key ESS2 requirements	Gaps/alignment	Provision in the national regulatory framework
Prohibition of the use of forced labor (that is, compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements.) No trafficked persons will be employed in connection with the project	Aligned	Fully aligned with section 6 of the LEAB 2007 to prevent any form of forced labor.
Equal opportunity and non-discrimination in recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, and disciplinary practices.	Aligned	Fully aligned with sections 11–13 of the LEAB 2007 to prevent any form of discrimination.
1. Ensure basic worker rights, including terms and conditions of employment, project workers are paid on a regular basis, and 2. adequate periods of rest per week, annual holiday and sick, maternity and family leave are provided. 3. Project workers will receive written notice of termination of employment and details of severance payments in a timely manner. 4. Access to facilities. 5. Right to form or join unions and engaged in collective bargaining 6. Freedom of association and collective bargaining	Aligned	All measures fully supported by LEAB 2007 and other Regulations – on hours of work, leave, minimum wages, gratuity, grievance procedure, provident fund, workers association, and so forth.
Establish and access to the mechanism for workers to raise complaints, concerns, recommendations related to terms and condition	Aligned	Any workers' complaint related to working conditions or the working environment at work or out of the workplace is managed as per the Chapter 12 of the Labor and Employment Act 2007
1. Protection and special provisions for vulnerable workers. 2. Protection of minors at work. 3. Protection of women and providing for their needs.	Aligned	All provisions fully supported by LEAB 2007. Prohibition of sexual harassment is covered under section 16–20.



Key ESS2 requirements	Gaps/alignment	Provision in the national regulatory framework
4. Protection of people with disabilities (PWDs) and providing for their needs.		
Provide written notice of termination of employment and details of severance payments in a timely manner. Ensure that all wages and benefits or any other entitlements are paid on or before termination of the working relationship and workers are provided with evidence of such payments.	Partially aligned	Bhutan's labor laws provide provisions for termination of a labor contract such as timely termination notice and payment of due amount, including unused leave. However, the laws remain silent on the demobilization of the works once a project is complete.



4. Brief Overview of Labor Legislation: Occupational Health and Safety

4.1 Regulatory Framework

Occupational health and safety (OHS) in Bhutan is governed primarily by the Labor and Employment Act of Bhutan (LEAB), 2007, and its subsidiary regulations. The Constitution of the Kingdom of Bhutan has incorporated various provisions to guarantee the rights of the workers to Occupational Health and Safety (OHS), including Article 12, which states that the State shall endeavor to ensure the right to work, vocational guidance and training and just and favorable conditions of work. Similarly, Article 13 says that the state shall endeavor to ensure the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay. These instruments establish the legal obligations of employers to provide a safe and healthy working environment and to prevent occupational injuries and diseases. The principal legal instruments applicable to this LMP include:

- Labor and Employment Act of Bhutan (LEAB), 2007
- Regulation on Occupational Health, Safety and Welfare, 2022
- Regulation on Occupational Health and Safety for the Construction Industry, 2022

These regulations apply to all workplaces in Bhutan, including construction sites, and are enforceable through the Department of Labor under the Ministry of Industry, Commerce and Employment.

4.1.1 Labor and Employment Act of Bhutan (LEAB), 2007

The LEAB 2007 establishes the overarching legal framework for occupational health and safety in Bhutan and imposes statutory obligations on employers to ensure worker protection. The Act also prescribes penalties and sanctions for non-compliance. Key features of LEAB 2007 relevant to OHS include:

- **General Duty of Care towards labor on Occupational Health and Safety (Sections 141 & 143):**
 - Section 141 requires employers to provide and maintain a working environment that is safe and free from risks to health.
 - Section 143 requires employers to identify significant workplace hazards and eliminate or reduce associated risks.
 - Employers must implement systems to monitor workplace health and safety conditions.
 - Employers must maintain information and records relating to employee health and safety.
 - Employers are required to provide compensation in case of personal injury arising out of and in the course of employment.
- **Protection of non-employees / towards non-labor (Section 146):** Employers must take necessary measures to prevent adverse impacts on the health and safety of any non-labor (visitors, contractors, suppliers, or the public) who may visit or pass through the workplace.
- **Employer to bear the cost of OHS (Section 148):** Employer shall not require employee to pay for any machinery, systems, arrangements, facilities, equipment, protective clothing and equipment, information, instruction, training or supervision related to OHS. And this shall be applicable for all the contractors and the workers therein.
- **Reporting of an accident or incident:** Section 154 requires an employer to immediately notify the Chief Labor Administrator in case of an accident that caused or could have caused death, loss or impairment of bodily function, loss of consciousness, electrical shock, acute or



chronic symptoms of exposure to any substance at the workplace, any other serious bodily injury or any injury or disease requiring medical treatment. In the event of the death of an employee due to an accident at work, Section 155 requires an employer to immediately notify the nearest police station and provide details of the accident.

- **Accident Record (Section 157).** An employer shall prepare a written record of the accident or incident referred to in sections 154 and 155 and submit to the Chief Labor Administrator within 5 calendar days of the employer becoming aware of it.
- **Compensation for OHS (Section 142):** An employer shall provide accident compensation for all employees. National rules and regulations do not specify what the insurance must cover, such as medical expenses, hospitalization, death benefits, disability compensation, minimum sum insured.
- **Duties of employees:** Section 159 requires an employee to take reasonable care for his or her own health and safety and for the health and safety of any other employee or person who may be affected by his or her acts or omissions at the workplace.
- **Right to Refuse Dangerous Work:** Section 162 ensures the right of an employee and adds that if an employee has reasonable justification to believe that a work situation presents an imminent danger, the employee may remove himself or herself from that situation, and Section 163 asks the employee to immediately report to the employer's representative or to the employer of that situation.
- **Appointment of health and safety representative:** Per the Section 166, the employees at a workplace may appoint one of its members to be their health and safety representative at that workplace to act on behalf of the employees in relation to health and safety matters, raise issues which are of concern to the employees about occupational health and safety, consult with the employer's representative, and provide a focal contact for labor inspection.

4.1.2 Regulation on Occupational Health, Safety and Welfare, 2022

The Regulation on Occupational Health, Safety and Welfare (2022) provides detailed implementation standards under LEAB 2007 and applies to all workplaces during both construction and operational phases. The Regulation aims to ensure safe working environments and reduce workplace injuries, lost-time claims, and fatalities. Its key provisions include:

- **Workplace Registration:** Section 24 of the Regulations on Occupational Health, Safety and Welfare requires an employer to register the workplace where any person at work in any workplace carries out any process, operation or work with the Chief Labor Administrator.
- **Health and Safety Committee:** Section 30 requires the formation of a Health and Safety Committee in any enterprise employing 20 or more employees, while Section 31 requires the formation of a nine-member committee along with a chairperson in an enterprise with more than 100 employees such as DHPL. Section 38 defines assisting and cooperating with the management in achieving the aims and objectives outlined in the Health and Safety Policy of the enterprise as one of the functions of the committee.
- **Appointment of Safety Officer:** Section 39 provisions that an appointment of a full-time safety officer in an enterprise with 20 or more employees are employed, the employer shall appoint a safety officer. One of the main responsibilities of the officer, according to Section 43, is to advise and assist the management in maintaining a safe working environment, and advise and carry out inspection, periodic hazard-identification and risk-assessment to ensure a safe and healthy workplace. The safety officer is also responsible for investigating every accident and dangerous occurrence which takes place within the workplace and any



occupational disease contracted in the workplace. Section 40 defines the required qualifications of the officer, while Section 41 requires the safety officer to be certified by a competent authority and registered with the Department of Labor, Ministry of Labor and Human Resources.

- **Health and Safety Program:** Section 50 requires the employer to prepare and implement an occupational Health and Safety program that ensures each workplace of the enterprise is safe and healthy. Section 51 specifies that the program needs to fix the responsibility of the contractors, sub-contractors, transporters and other agencies entering the premises, and relevant techniques and methods, such as periodic monitoring, safety audits and risk assessment of the status on health, safety and environment and taking all remedial measures. These measures will be covered in the DHPL OHSMF.
- **Risk Assessment:** Section 52 requires the employer to identify the hazards of every workplace and conduct a risk assessment in relation to the safety and health risks posed to any person, while Section 53 asks for carrying out an assessment whenever there is a change in the work process or new machines and equipment are installed. These aspects will be covered under HIRA.
- **Elimination and Control of Risk:** As per Section 54, the employer shall take all reasonably practicable steps in every workplace, including the use of suitable personal protective equipment, to eliminate any foreseeable risk to any person who may be affected by his/her undertaking in the workplace.
- **Workplace Emergency Action Plan:** Section 63 requires the employer to prepare and implement a Workplace Emergency Action Plan in any workplace of an enterprise with 20 or more employees.
- **Personal Protective Equipment:** As per Section 72, it is the responsibility of the employer to provide the employees, at no cost to employees, with personal protective equipment for the eyes, face, hands and feet, protective shields and barriers whenever necessary by reason of the hazardous nature of the process or environment, chemical or radiological or other mechanical irritants or hazards capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact. In addition, Section 73 requires all the personal protective equipment to be of the approved design and construction appropriate for the exposure and the work to be performed.

4.1.2 Regulation on Occupational Health and Safety for the Construction Industry, 2022

The Regulation on OHS for the Construction Industry (2022) provides sector-specific standards applicable to construction-related workplaces. It applies to all licensed construction companies and to employers engaging significant workforces at construction sites, including both Bhutanese and foreign workers. Key features include:

- **Scope of the Regulation:** Section 5 defines the scope of the regulation and says that the regulation shall apply to all construction sites where one or more persons are employed.
- **Duties of Employer:** Section 6 requires the employer to provide and maintain a safe and healthy working environment for all employees and any other person present at a workplace.
- **Age of Employment:** Section 7 prohibits employing any person under the age of 18 for any construction activities
- **Health and Safety Policy:** Section 13 talks about the Health and Safety Policy and requires the employer of every establishment employing 12 or more construction employees to prepare a written statement of health and safety policy.



- **Health and Safety Committee:** Section 14 says a Health and Safety Committee is established, organized, and maintained at construction sites.
- **Safety Officer:** Section 15 asks for the appointment of a safety officer at the workplace of construction, employing 20 or more employees.
- **Safety Representative:** Section 16 requires an employer to nominate a Health and Safety Representative at every workplace.
- **Construction Safety Supervisor:** Section 17 asks the employer to appoint a Construction Safety Supervisor at every construction/project site, irrespective of size and number of employees employed. Section 19 states that the supervisor should be certified by a competent authority and registered with the Ministry of Labor and Human Resources.
- **Workplace Emergency Action Plan:** An employer is required to put in place workplace emergency action plans to handle emergencies at a construction site where more than 100 employees are employed. The emergencies may include fire and explosion, collapse of lifting appliances and transport equipment, collapse of buildings, sheds or structures, gas leakage or spillage of dangerous goods or chemicals, and traces of highly infectious(communicable) diseases, among others.
- **Protection of the Public:** As per Section 23, a safe covered walkway is required to be constructed over the sidewalk for use by pedestrians in a building construction work less than 2.3 m from a sidewalk or public road.
- **Fire Protection:** Section 29 requires an employer to ensure that a construction site for a building or other site is provided with effective fire extinguishing equipment, which is reliable and suitable for the workplace activity to extinguish any probable fire at the construction site sufficiently.
- **Fencing of Motors:** As per Section 30, an employer shall ensure at a construction site that all motors, cogwheels, chains and friction gearing, flywheels, shafting, dangerous and moving parts of machinery (whether driven by mechanical power) and steam pipes are securely fenced or lagged.
- **Barricade and Fencing of Construction Site:** Section 31 requires the employer to barricade the construction sites, excavations, holes, floors, and roof openings, raised platforms, overhead work and restricted areas.
- **Lifting and Carrying of Excessive Weight:** Section 35 states that the employer shall ensure that a male worker shall not be made to lift by hand or carry overhead or over his back or shoulders any material, article, tool or appliance over 50 kg and for a female worker, over 25 kg.
- **Overhead Protection:** As per Section 37, the employer shall ensure that overhead protection is erected along the periphery of every building/work under construction, which shall be of 15 m or more in height when complete.
- **Fall from Height:** Section 44 states that wherever the employees are exposed to the hazards of falling from a height while employed at such work, they shall be provided by the employer with adequate equipment or means for saving them from such hazards. Similarly, Section adds that wherever there is a possibility of falling of any material, equipment or worker, adequate and suitable safety nets shall be provided by the employer.
- **Drowning:** Section 47 asks employers to provide adequate lifesaving equipment if employees are exposed to the hazards of falling into water. If the Labor Inspector considers it necessary, a well-equipped boat or launch manned with trained personnel shall be provided.



- **Electrical Hazards:** Section 48 requires the employer to take adequate measures to prevent any employees from being exposed to electrical hazards before commencement of any construction work.
- **Vehicular Traffic:** Section 55 requires the employer to place or install flagmen, warning signs, barriers, or lane control devices in the construction site where an employee's safety is likely to be endangered by vehicular traffic. If necessary, the employer may make a written request to the relevant authorities to control such traffic.
- **Stacking and Storage of Materials:** Section 60 states that the employer shall ensure that all building materials are stored or stacked in a safe and orderly manner to avoid obstruction of any passageway or place of work, material piles are stored or stacked in a manner as to ensure stability, and material or equipment is not stored up on any floor, platform and permanent or temporary structure based on safe bearing capacity, among others.
- **Disposal of Debris:** Per Section 61, the employer at a construction site is required to ensure that debris are handled and disposed by a method which does not cause danger to the safety of a person, debris are not allowed to accumulate so as to constitute a hazard, and debris are kept sufficiently moist to bring down the dust within the permissible limit, among others.
- **Storage of Cylinders:** Section 63 states that the compressed gas cylinders shall be stored in upright positions protected against heat and overturning, and when not in use, the control valves shall be covered by protective caps screwed in proper positions.
- **Temporary Living Accommodation:** Section 73 states that if the employer were to provide living accommodation for the employees at the site or near the construction sites, the living accommodation should be constructed at the safest place where there is no risk of flooding, landslide, collapse, falling boulders and other elements in accordance with Schedule III appended to this Regulation. **Welfare:** Section 71 requires an employer to provide a canteen, sanitary conveniences, a lunchroom, washing facilities, and changing rooms in every workplace. Similarly, Section 72 states that every construction site shall have access to a sufficient supply of safe drinking water.
- **Medical Examination of Construction Employees:** Section 74 requires the employer to ensure that a construction worker employed for work involving such inherent risks or hazards is medically examined once every 6 months by a qualified medical professional at a construction site, at no cost to employees.
- **Occupational Health Room:** Section 75 requires an occupational health room with an effective communication system, and that such a room is under the overall charge of a qualified medical professional and a nurse in cases where more than 200 employees are employed.
- **Ambulance Van:** Per Section 76, the employer is required to ensure an ambulance van with basic lifesaving equipment at a site employing more than 200 employees.
- **First Aid Box:** Section 78 asks the employer to ensure enough first aid boxes or cupboards are maintained for providing first aid to the employees at a construction site, while Section 79 requires the employer to appoint a First Aider in every workplace.
- **Safety Precautions in Excavation and Tunnelling Works:** Section 83 states that an employer is responsible for ensuring that adequate precautions are taken while undertaking any excavation, earthwork, shaft, underground or tunnelling works to protect the employees against danger from a fall or dislodgement of earth, rock or other material by suitable shoring. Section 84 asks for maintaining a check-in and check-out procedure to determine an accurate count of the number of employees in the event of a workplace emergency at any construction site where underground or tunnel work is carried out.



- **Warning Signs and Notices:** Section 86 asks the employer to display warning signs and notices at the entrance to warn persons against unauthorized entry into the compressed air environment.
- **Supply of Air:** Section 90 says that the employer must ensure an adequate supply of compressed air to a working chamber in a worksite, while Section 91 asks for a reserve supply of compressed air to be made available for every man-lock and medical lock located in a worksite, and Section 93 requires instrumentation or gauges indicating the pressure in a working chamber in a worksite.
- **Temperature and Humidity:** Section 97 requires that the temperature in any working chamber, man-lock, or medical lock on a worksite shall not exceed 29°C, and that the relative humidity shall not exceed 85%.
- **Means of Communication:** Section 100 states that effective and reliable means of communication, such as a telephone network, shall always be maintained at the face of an excavation of the working chamber and the working chamber side of the man-lock, etc.
- **Appointment of Competent Person for Compressed Air Works:** Section 101 requires the employer to appoint a competent person as a gauge attendant who shall always be in control of the air supply plant and be in attendance when any person is employed in a compressed air environment

4.2 Alignment and Gaps with key requirements of the ESS2

Bhutan's legal framework exhibits significant alignment with the Bank's Environmental and Social Standards on OHS of the ESS2. Gaps are mostly procedural and capacity issues.

Table 4.1: Gaps and alignment of Bhutan's Labor Laws with ESS2 requirements

Key ESS2 requirements	Gaps/alignment	Provision in the national regulatory framework
National laws related to OHS	Aligned	OHS is covered under sections 141–145 of the LEAB 2007 and in its rules and regulations: the Regulation on OHS and Welfare 2022, the Regulation on OHS for the Construction Industry 2022, and the Rules and Regulations on OHS 2022.
Institutional framework for implementation of OHS laws and requirements	Aligned	Section 30 of the Regulation on OHS 2022 provides an institutional framework for the implementation of OHS, while Section 31 defines the composition of the nine-member Health and Safety Committee, and Section 38 defines the functions of a Health and Safety Committee and makes the committee responsible for the implementation of the Health and Safety Policy of a construction project.
Preparation of OHS plan or similar policy for project workers Implementation of OHS plans and measures	Aligned	Section 13 of the OHS for the Construction industry 2022 requires a construction project employing 12 or more construction employees to prepare a health and safety policy, while Section 21 requires the preparation of a Workplace Emergency Action Plan for any construction activities employing more than 100 workers.
Establishment of mechanisms for workers to raise	Mostly aligned	Section 288 of the Regulation on Working Conditions, 2022 requires the preparation of a



Key ESS2 requirements	Gaps/alignment	Provision in the national regulatory framework
complaints, concerns, and recommendations for improved safety practices and OHS		grievance procedure in consultation with the workers' association or employees' representatives, while Section 292 bars an employer from taking any retaliatory action against an employee who lodges a complaint under the available grievance procedure. The grievance procedure provides a two-level GM, and Section 303 provides an avenue to appeal to the Chief Labor Administrator within 15 working days, if the grievance remains. Section 98 of the Regulation on Working Conditions, 2022 makes the workers' association responsible for representing an individual worker in any work-related complaint against the employer and participating in an enterprise grievance procedure where so requested by a worker. However, the regulation remains silent on the available multiple uptake channels and the timeline for resolution from the first-level GM and its composition and formation.
Establishment and implementation of measures for monitoring, supervising and enforcing agreed plans and measures related to OHS.	Partially aligned	Section 51 of the Regulation on Occupational Health, Safety and Welfare, 2022 requires the Health and Safety program to specify relevant techniques and methods for periodic monitoring of OHS, including the exposure of employees to hazardous chemicals and substances, harmful radiation, heat Stress, adequate illumination at the workplace, and noise level. Similarly, Section 44 makes the Safety Officer responsible for preparing a monthly report on the activities conducted under OHS and welfare activities and submitting it to the employer. However, there is no specific requirement in the regulation for the employer or the project to prepare a periodic monitoring report on the overall implementation of the OHS and welfare activities and submit it to the component government authorities.
Provisions related to labor accommodation, logistics, including water and sanitation	Aligned	Section 73 of the OHS and Welfare Regulation, 2022 supplemented by Schedule III provides specific prescription for temporary living accommodation, including minimum size of the room for a labor protected against wind, cold, rain, heat, among others, one pour-flush toilet cum bathroom for every six users, separate bathroom, washing facilities for male and female, adequate natural light and artificial light, adequate ventilation to ensure sufficient movement of air in all conditions of weather and climate.

Key ESS2 requirements	Gaps/alignment	Provision in the national regulatory framework
Provisions for regular review of OHS performance and the working environment	Partially aligned	Section 44 of the OHS and Welfare Regulation, 2022 makes the Safety Officer responsible for preparing a monthly report on OHS and welfare activities conducted and submitting it to the employer. But the regulation remains silent on the submission of a periodic report to the competent government authorities for review and approval.
Provisions for identification and implementation of OHS hazards and risks and effective methods for responding to identified hazards and risks	Aligned	Section 52 of the OHS and Welfare requires an employer to identify the hazards and conduct a risk assessment in relation to the safety and health risks posed to any person, including the exposure of employees to hazardous chemicals and substances harmful radiation, heat Stress, adequate illumination at workplace, noise level, safety or health signs, personal protective equipment, permissible exposure for occupational noise, fire extinguisher classification, and first aid and medical surveillance and examinations, among others.
Provision for workers' right to reject imminent dangerous jobs/situations without fear of retaliation	Aligned	Section 162 of the Labor and Employment Act of Bhutan, 2007 ensures the right of an employee and adds that if an employee has reasonable justification to believe that a work situation presents an imminent danger, the employee may remove himself or herself from that situation and Section 163 asks the employee to immediately report to the employer's representative or to the employer of that situation. Section 165 bars the employer from taking any punitive or discriminatory action against an employee who exercises their right.
Remedies for adverse impacts such as occupational injuries, deaths, disability and disease	Aligned	Section 468 of the Regulation on OHS and Welfare, 2022 says that an employer is responsible for paying compensation to all employees for injuries or diseases or death arising out of and in the course of employment. Section 489 of the Regulation on OHS and Welfare, 2022 requires an employer to ensure all employees are insured with an authorized financial institution to ensure compensation for workplace accidents.
System put in place to record and report incidents, including injuries and fatalities of workers	Partially aligned	Section 466 of the Regulation on OHS and Welfare, 2022 requires an employee to record all accidents as per the format provided in Form 8. In case of bodily injury to an employee which may result in death, Section 459 Regulation on OHS 2022 requires an employer to immediately notify the Chief Labor Administrator and the nearest Police Station of the accident. Section 460 says that the notification should be done within 5 days of the occurrence of the accident, while Section 461 provides a list of



Key ESS2 requirements	Gaps/alignment	Provision in the national regulatory framework
		workplace injuries that employers are required to report to the Chief Labor Administrator. However, Section 463, supplemented by Schedule XI, specifies a list of accidents defined as Dangerous Occurrences and an employee is required to confirm the incident in a written report in Form 6 to the Chief Labor Administrator within 2 days after the dangerous occurrence. However, the laws do not require proper investigation into the incidents and mitigation measures agreed and implemented to prevent recurrence of similar incidents.
Management of complaints related to SEA/SH	Partially aligned	Section 276 of Regulation on Working Conditions, 2022 requires every enterprise to prepare and implement a Policy on Prevention of Sexual Harassment and a written complaints procedure to advise victims of the steps they should take to lodge a formal complaint against a harasser. Section 278 of the says that a victim of sexual harassment may lodge a complaint with the employing agency or the Royal Bhutan Police. However, it does not talk about the confidentiality of the victim and immediate supports, including through third-party service providers.

5. Responsible Staff

DHPL is responsible for engaging with key Project players, such as contractors and owners' engineers and managing potential risks and impacts related to workers at the national and local levels. DHPL performs a supervision and oversight role, while Contractors are responsible for the day-to-day implementation of labor and OHS requirements. The Owner's Engineer (OE) provides technical guidance and intermittent oversight support. In addition, contractors will be made responsible for managing OHS issues for contracted workers and ensuring sound working conditions, as required by applicable Bhutanese laws and ESS2 of the ESF. The table 5.1 outlines the key staff responsible for the effective implementation of the LMO, along with their roles and responsibilities overall project implementation, including management of labor and working conditions in compliance with Bhutanese legislation and ESS2. The OHS staffing within these institutions and their responsibilities are discussed in this chapter.

5.1 Institutional Structure for Labor and OHS Management

DHPL has established a dedicated Environment, Social, Health and Safety Division (ESHSD). The ESHSD is headed by the ESHSD manager and includes the OHS unit, along with environmental, biodiversity and social units. The OHS unit includes the following staff:

- 1 OHS Manager
- 3 OHS Officers
- 30 OHS Supervisors

The number of staff required is based on early-stage planning. Based on E&S supervision and capacity building firm input and the experience from EHS implementation for preparatory work, these roles and responsibilities and the staffing will be further revisited.

All Site Supervisors are required to complete NEBOSH/IOSH OHS Certification Training as a mandatory prerequisite and will additionally assume the role and responsibilities of OHS Supervisors. These supervisors form part of the DHPP Supervision Team deployed across major work fronts.

Contractors are mandated to maintain their own E&S staffing structure and prepare and implement an Occupational Health and Safety Management Plan (OHSMP) consistent with the Project OHSMF. The Contractors team include 5 OHS specialists and 15 OHS supervisors. The OE will have one OHS specialist.

5.2 Roles and Responsibilities of DHPL, Contractors and OE

The roles and responsibilities of DHPL, Contractors and OE are given in Table 5.1

Table 5.1: Key responsible staff and responsibility

Responsible agencies/ staff	Roles and Responsibilities
DHPL Project site office	
DHPL Project Director/CEO	• Overall supervision of the implementation of all aspects of the LMP, including supervising effective implementation of the LMP, including the functioning of Worker GRM, Worker Code of Conduct, and contractors' compliances. • Ensuring the incorporation of labor-related requirements specified in applicable laws of Bhutan and the Project LMP into procurement of works and supplies.



Responsible agencies/ staff	Roles and Responsibilities
	• Supervising the engagement with and managing contractors, including ensuring E&S compliances and the Project LMP and provide guidance when required. • Approving periodic monitoring and reporting on implementation of the LMP and OHS performance, as agreed. • Supervising the implementation of working condition and OHS obligations of the owner's engineer, contractors and subcontractors as required by applicable Bhutanese legislation and ESS2 at all workplaces. • Supervising capacity-building activities, including training and orientation on OHS and other relevant issues for project workers. • Supervising the functioning of the workers' GRM, including issues related to SEA/SH and periodic reporting of the functioning of the GRM. • Supervising the system for regular monitoring and reporting on labor and occupational safety and health performance. • Supervising and providing guidance on monitoring of the implementation of the Worker Code of Conduct. • Ensuring adequate ESHSD staffing and resource allocation. • Reporting serious incidents to national authorities and the World Bank as required.
ESHS Manager of the ESHS Division	• Ensuring effective implementation of the LMP, functioning of the workers' GRM, monitoring of OE's and contractors' compliance related to labor and working conditions • Ensuring the timely preparation of periodic monitoring report, submitting to competent authorities for approval and sharing the report with agencies as guided by Project agreements. • Monitoring the implementation of labor working conditions, Code of Conduct, and OHS obligations of the contractors and subcontractors as required by national laws and ESS2 and periodic reporting on OHS performance. • Ensuring an effective system is put in place for regular monitoring and reporting on labor and occupational safety and health performance. • Monitoring compliance of the working conditions and OHS at all workplaces in line with the requirements of Bhutanese national legislations and the ESS2. • Support the owner's engineer and construction contractors to design and impart training on OHS to workers and supervise the effectiveness of such training. • Ensuring the functioning of the workers' GRM, including issues related to SEA/SH along with the periodic reporting of the GRM functioning • Take immediate actions as required by national laws to inform national agencies and the Bank, as per the Project financing/legal agreement, in case of any incident that cause workers' injuries or/and fatalities. • Monitor and implement training on LMP and OHS for project workers.

Responsible agencies/ staff	Roles and Responsibilities
Labor officer and OHS Specialist/Officer at OHS Unit	• Establish, implement, and continuously improve the Project Occupational Health and Safety Management System (OHSMS) in alignment with ESS2, Bhutanese labor and OHS regulations, and Good International Industry Practice (GIIP). • Review and approve Contractor's OHSMP and LMP (C-LMP) and ensure implementation of OHS requirements under the contractors' OHSMP and C-LMP. • Review contractors' Method Statements, Job Safety Analyses (JSAs), and Risk Assessments • Closely monitor and participate and facilitate, when required, in ensuring effective implementation of the LMP associated with owner engineer's and contractors' compliance related to labor and working conditions with C-LMP and the functioning of the WGRM • Play a key role in preparing the periodic reporting of the implementation of the LMP, including the nature and number of received, resolved, and outstanding workers' grievances. Submit the periodic period to the ESHS Manager for approval. • Closely monitor and participate and facilitate, when required, in ensuring effective implementation of the workers' code of conduct and OHS obligations of the contractors and sub-contractors in line with the national and ESS2 requirements. • Prepare the capacity building plans, including periodic training, for the DHPP staffs, contractors/sub-contractors and project workers on OHS, working condition and other relevant issues and facilitate the implementation of the plans. • Ensuring effective implementation of the WGRM, including the SEA/SH, and maintaining records of complaints received through the WGRM and solved. • Lead or support investigations of serious incidents, near misses, and fatalities. • Immediately report incidents that cause workers' injuries and/or fatalities and take a lead role in investigating the incident. • Suggest corrective actions, if required, to deal with recurring issues related to working conditions, OHS and WGRM. • Prepare periodic OHS performance reports for project management.
OHS Officers at the OHS Unit of ESHSD	• Support the OHS Manager in implementing, maintaining, and periodically updating the Project Occupational Health and Safety Management System (OHSMS) in line with ESS2, Bhutanese OHS regulations, Good International Industry Practice (GIIP), and project-specific ESMP and C-ESMP requirements, including ensuring that site-level safety procedures, codes of practice, and work protocols are properly applied across all work fronts. • Conduct routine inspections across construction areas, tunnels, dam and powerhouse works, camps, batching plants, workshops and associated facilities to identify unsafe acts and conditions, assist in hazard identification and risk assessments, monitor implementation of safe work methods and Permit-to-Work systems (including confined space entry and lock-out/tag-



Responsible agencies/ staff	Roles and Responsibilities
	out procedures), and ensure timely tracking and closure of corrective actions. - Record and promptly report workplace accidents, near misses, unsafe conditions, and non-compliances; assist in incident investigations; support implementation of corrective and preventive actions; and maintain accurate records for analysis, reporting, and continuous improvement of workplace safety performance. - Deliver and support OHS induction training for all workers prior to commencement of work, facilitate toolbox talks and refresher sessions, reinforce compliance with safe work practices and PPE requirements, and promote worker awareness of site-specific hazards and reporting mechanisms. - Assist in implementation of workplace-related Emergency Response Plans, participate in and support emergency drills (including fire, tunnel evacuation, and medical emergencies), and monitor the availability, functionality, and accessibility of emergency equipment such as first aid kits, fire extinguishers, rescue equipment, and communication systems. - Monitor contractor compliance with approved OHS procedures, safety plans, labor-related OHS requirements, and national regulations; participate in coordination meetings with contractor safety personnel; inspect worker welfare facilities, including accommodation and sanitation; and report deficiencies requiring corrective action to the OHS Manager. - Compile daily, weekly, and monthly OHS monitoring reports, support periodic safety performance reviews, track trends in incidents and non-compliance, and recommend practical measures to strengthen workplace safety performance and compliance with ESS2 requirements.
Owner's Engineer	
OHS Specialist	- Continuous inspection of project sites, to ensure a hazard-free environment - Assessment and approval of contractor's safety plans - Verification of tools and equipment to ensure the required quality - Promoting safe practices on site. - Creating and enforcing safety guidelines and programs. - Carrying out drills and exercises on managing emergency situations. - Conducting investigations on accidents. - Verifying that all safety reports are submitted to related government institutions. - Responding to worker safety concerns. - Managing all communications with government departments in regards of safety - Arranging OSHA-mandated evaluations of the site. - Coordinating all issues regarding hazardous materials or waste. - Preparation of a construction health and safety plan. - Attending project planning meetings and collaborating with construction managers. - Review and monitor the community health and safety plan, labour safety and management plan etc.

Responsible agencies/ staff	Roles and Responsibilities
	- Establishing and maintaining health and safety communication structures. - Testing effectiveness of site emergency response plans. - Continuous monitoring of all safety related documents, reports and issues to keep them updated.
Social Specialist- Labour	- Monitoring the contractors in implementation of the LMP, including contractors' compliances, and the functioning of WGRM. - Immediately inform the ESHS Manager of the ESHS division of the DHPP in case of any incident that causes workers' injuries or/and fatalities and provide site reporting on other proceedings thereafter, as long as the investigation is not complete. - Provide periodic reporting on implementation of the LMP to the ESHS division of the DHPL. - Providing required information to the ESHS division to prepare periodic monitoring report. - Ensure the implementation of the Worker Code of Conduct. - Supporting and monitoring the implementation of working condition. Terms of employment and OHS obligations of the contractors and subcontractors as per applicable regulations, ESS 2 and applicable WBG WHS guidelines. - Monitoring compliance of OHS at all workplaces in line with the requirements of national laws and ESS2. - Monitoring and facilitate the periodic training to be given to the project workers on OHS and other issues. - Monitoring and reporting the functioning of the workers' GRM, including issues related to SEA/SH. - Review, planning, preparation and strengthening of strategy documents for social safeguards and safety. - Implement all safeguard matters encompassing social aspects following the plans and policies prepared during project preparation stage. - Prepare operation and maintenance strategy documents from the view point of social safeguards, as needed. - Implementing, monitoring and reporting all safeguard matters encompassing social aspects as per the plans and policies prepared during project preparation stage. - Assist in maintaining sound external relations and personnel relations. - Manage other social related consultant recruitment and work performance.
Construction Contractors	
OHS Specialist Labour/IR/ HR specialist	- Prepare and implement contract-specific C-LMPs and ensure their effective implementation, including compliance with the national requirements. - Ensure all the agreements/requirements of approved C-LMP is properly included in the agreements with sub-contractors and suppliers, including the requirements related to contracted workers and primary suppliers' worker.

Responsible agencies/ staff	Roles and Responsibilities
Gender Specialist	• Maintain records of recruitment and employment process of contracted workers and ensure that the job description and employment conditions are clearly communicated to the contracted workers and primary suppliers' worker. • Immediately inform the owner's engineer and the DHPP ESHS manager of any incidents that cause workers' injuries or/and fatalities. • Have a system for regular review and monthly reporting on working condition and OHS performance and other relevant information as required, to social specialist of the Owner's Engineer and labor officer of DHPP. • Ensure that all contractor and subcontractor workers understand and sign the Code of Conduct prior to the commencement of works and supervise compliance with the Code. • Prepare and undertake periodic OHS and SEA/SH awareness orientations to contracted workers and report such orientation activities to social specialist of the Owner's Engineer. • Tracking and responding to workers' grievances and providing monthly reporting to the to social specialist of the Owner's Engineer. Refer and coordinate with SEA/SH GBV focus person in case of any incidents related to SEA/SH involving workers. • Develop clear systems to implement provisions stipulated under applicable local regulations including but not limited to preparation of service manual, payment of wages, overtimes, leaves, weekly off, allowances, recording of working hours, rest hours, wage slip, accommodation etc,

6. Policies and Procedures

Based on the requirements of ESS2 and the national labor laws of Bhutan, the following policies and procedures will apply to this project.

6.1 General Labor Management Principles

6.1.1 Non-discrimination in Employment:

The Project adopts a zero-tolerance policy toward discrimination in employment and is committed to equal opportunity, fair treatment, and respect for all project workers. Decisions relating to the employment and conditions of project workers will not be made based on personal characteristics unrelated to the typical requirements of the job. Also, decisions relating to recruitment, hiring and compensation (including wages and benefits), working conditions access to training, job assignment, promotion, termination of employment, retirement, and disciplinary practices.

The contractual arrangements with each project worker must be clearly defined in accordance with applicable national law and the requirements of the ESS2 in accordance with:

- The Constitution of the Kingdom of Bhutan (guaranteeing equal pay for work of equal value and protection against discrimination),
- Sections 11 and 85 of the Labor and Employment Act of Bhutan (LEAB) 2007 (prohibiting discrimination in recruitment, dismissal, transfer, training, demotion, and termination),
- ESS2 requirements on non-discrimination and equal opportunity

DHPL and Contractors will ensure that:

- Employment is based on merit, qualifications, and experience
- Equal pay is provided for work of equal value
- No discrimination occurs on the basis of race, color, sex, caste, tribe, marital status, pregnancy, religion, political opinion, social origin, migrant status or other status protected under national law
- Women and vulnerable groups are not excluded from employment opportunities where they meet job requirements
- Recruitment processes are transparent and fair
- Employment contracts are clearly defined in writing and consistent with national legislation and ESS2
- Workers are informed of their rights and obligations at the time of recruitment.

The Project also prohibits any form of harassment, intimidation, or unfair treatment in the workplace. Contractors are required to incorporate these principles into their Contractor Labor Management Plans (C-LMPs), Codes of Conduct, and internal human resource policies.

Compliance with non-discrimination principles will be monitored through periodic review of recruitment practices, wage records, and grievance reports. Any violations identified will result in corrective actions and, where necessary, contractual remedies.



6.1.2 Contractor's responsibility for Environmental and Social plans:

Environmental and social impacts of subprojects resulting from activities directly under the control of contractors will be mitigated directly by the contractors. The DHPL will incorporate standardized environmental and social clauses and requirements in the bidding documentation and contract documents to create awareness about project impacts among potential bidders, demonstrate project expectations about contractor performance, and impose liability for compliance with the Environmental and Social performance requirements of National laws and the World Bank ESF, particularly ESS1, ESS2 and ESS4 and other lenders requirement. Bidding contractors must include declared commitments and concrete measures to address environmental and social impacts related to their scope of work for the duration of the contract. The DHPL will enforce compliance by contractors with these clauses.

Integration into Procurement and Contracts

The DHPL will incorporate standardized Environmental and Social clauses and requirements in the bidding documentation and civil works contracts these will:

- Clearly communicate project-specific Environmental and Social risks and expected standards of performance.
- Reference compliance with the Labor and Employment Act of Bhutan (2007), OHS Regulations (2022), Construction OHS Regulation (2022), and other relevant national legislation, including updates and any other applicable regulation during construction period.
- Require alignment with the World Bank ESF, including ESS2 (Labor and Working Conditions)
- Establish contractor liability for non-compliance, including corrective actions, financial penalties, suspension of work, or contract termination where warranted.
- Bidders will be required to submit, as part of their technical proposals, a clear statement of ESHS commitments and a methodology demonstrating how Environmental and Social risks within their scope of work will be managed throughout the contract duration.
- Environmental and social impacts of subprojects resulting from activities directly under the control of contractors will be mitigated directly by the contractors.

Contractor-Specific Management Plans

As a core contractual requirement, contractors are required to prepare and implement

- A contractor's LMP (C-LMP), which will highlight specific activities as part of the project LMP that the contractors are responsible to implement to mitigate and manage potential risks and impacts related to labor and working conditions. The Contractor LMP shall clearly define: Worker recruitment procedures, terms and conditions of employment, OHS measures; Worker Code of Conduct, Worker grievance redress mechanism; Measures to prevent forced labor and child labor, workers' GRM, reporting of incidents involving workers, and changes contractors' policy related to labor and working to the DHPL. The C-LMP will also provide details on contractor dedicated HR/IR staffing and systems in place to implement the applicable regulations and ESS2 requirement, A full set of contractual requirements related to environmental and social risk and impact management will be provided in the project's ESMP and bidding documents and contracts in addition to any additional measures which are contained in the project's environmental and social instruments and SEA/SH prevention and response measures.



- A Contractor Environmental and Social Management Plan (C-ESMP) consistent with the Project ESMP.
- No contractor shall commence mobilization prior to approval of its C-ESMP and C-LMP by the DHPL

6.1.3 No forced and bonded labor:

The DHPL, OE, Contractors, suppliers, or subcontractors shall not engage in forced and bonded labor under any circumstance. Forced labor includes bonded labor (working to defray indebtedness), under excessive limitations of freedom of movement, retention of their identity, travel or other government-issued documents or personal belonging, imposition of recruitment or employment fees payable at the commencement of employment, loss or delay of wages that impede the workers' right to end employment within their legal rights, substantial or inappropriate fines, physical punishment, use of security or other personnel to force or extract work from project workers, or other restrictions that compel a project worker to work in a non-voluntary basis can be referenced to the LMP, together with any other supporting documentation. The country laws of Bhutan, including Section 6 of the Labor and Employment Act prohibits forced or compulsory labor as it states that no person shall make use of, cause or permit any form of forced or compulsory labor that is extracted under the menace of any penalty and for which the person has not offered himself or herself voluntarily.

To prevent risks of forced or bonded labor, the following measures shall be implemented:

- Owner's Engineer and the contractors will adhere with the provisions and requirements of the country laws, the ESS2 and the LMP/contractors LMP on labor and working conditions such as minimum age, equal pay for equal work, provisions on leave, provisions for rest periods and breaks, mandatory employment contract, clearly defined working hours, and workers' insurance.
- All workers shall enter written employment contracts in a language they understand.
- No recruitment fees or related costs shall be charged to workers at any stage of recruitment.
- Contractors shall ensure ethical recruitment practices, including oversight of labor recruitment agents.
- Workers shall always retain possession of their personal identification and travel documents.
- Wages shall be paid regularly, directly to workers, and in accordance with contractual terms.
- Workers shall have the right to terminate employment in accordance with national law without fear of retaliation.
- Worker accommodation and site access shall not restrict freedom of movement outside working hours.
- Independent and confidential grievance mechanisms shall be available to workers.
- DHPL and the Owner's Engineer may at any time require or ask the contractors to provide records from contractors to ensure that labor conditions are met.
- DHPL will review labor records against actuals at a minimum quarterly (including through internal and external audits/ monitoring) and can ask to take immediate remedial actions if warranted. A summary of issues and remedial actions will be included in quarterly reports to the World Bank.

6.2 Occupational, Health and Safety

The OHS Unit of DHPL will be responsible for identifying potential hazards, investigating the cause of accidents at the workplace, inspecting the workplace, including construction activities, plant and



machinery, with a view to ascertaining the safety and health of employees and have designated Safety, Health and Environment specialist for the workplace for an agreed period and will be responsible for identify potential hazards, investigate the cause of accidents at the workplace, inspect the workplace including construction activities, plant and machinery, with a view to ascertaining the safety and health of employees, accompany an inspector while that inspector is carrying out the inspector's duties in the workplace, attend meetings of the safety and health committee to which that safety and health representative is a member, make recommendations to the DHPL in respect of safety and health matters affecting employees, through a safety and health committee, and where there is no safety and health committee, the safety and health representatives shall make recommendations directly to the DHPL in respect to any safety and health matters affecting the employees. In addition, to avoid work-related accidents and injuries, the contractor will provide occupational health and safety training to all employees involved in work, protective masks, helmets, overalls and safety shoes, and safety goggles, as appropriate and workers in high noise areas with earplugs or earmuffs. Moreover, the contractors will ensure the availability of first aid boxes at the worksites, provide employees with access to toilets and potable drinking water, safety and occupational safety measures to workers with Personal Protection Equipment (PPE) to prevent accidents during construction activities and ensure proper disposal of solid waste at designated permitted sites allocated by the local authorities. Thus, the DHPL is committed to:

- Complying with national legislation and other applicable requirements, including ESS2, that are related to the occupational health and safety hazards.
- Enabling active participation in OHS risks elimination through promotion of appropriate skills, toolbox meetings, as well as training on risks and hazard awareness.
- Continually improving the OHS management system and performance.
- Communicating OHS procedures to all persons working for the project with emphasis on individual safety awareness and responsibilities.

The DHPL, OE, and the Contractors will have their respective and designated OHS staff on the Project site. These OHS staff, at a minimum, are expected to:

- Identify and assess potential hazards
- Investigate and prepare a report about cause of accidents at the workplace in collaboration with the contractors,
- Inspect the workplace, including water, sanitation and waste management facilities, workers' accommodation, including lighting, airflow etc, occupational safety measures with a view to ascertaining the safety and health of workers
- Accompany a third-party inspector(s), if required, during project-related site inspection duties in the workplace, and
- Make recommendations to the DHPL in respect of safety and health matters affecting workers.
- Further, to avoid work-related accidents and injuries, contractors will:
- Provide occupational health and safety training to all employees involved in works.
- Provide protective masks, helmets, safety boots, safety vest, gloves safety goggles etc., including appropriate, communication sets and electronic locators for those working in the construction of tunnel
- Provide workers in high noise areas with earplugs or earmuffs.
- Ensure availability of well-stocked first aid box at each camp and working sites



- Provide employees with access to toilets and potable drinking water.
- Properly dispose of solid waste at designated waste bins
- Carry out all procedures to prevent leakage of generator oil into the site.

Further to enforcing the compliance of environmental management, contractors are responsible and liable for safety of site equipment, labors and daily workers attending to the construction sites and safety of citizens for each subproject site, as mandatory measures.

Contractors must engage adequate and designated OHS specialists as per the requirements of their bidding documents. The OHS specialists ensures day-to-day compliance with specified safety measures and records of any incidents. All the incidents involving project workers that cause injuries and/or fatalities need to be managed as per the standard WB procedures. In case of such incidents, the Bank team, particularly the TTL, will request the DHPL to provide details about the incident using an incident form to ensure that pertinent information is provided. The DHPL will send the incident form to the WB and other lenders promptly within 48 hours.

Additional Training: contractors are responsible for training of all their workers. The OHS officer will provide instructions to the contractor staff. The DHPL will provide training to address risks associated with labor influx and will provide a schedule for the training required. The contractor will be obligated to make staffs available for this training, as well as any additional mandatory training required by the DHPL, as specified by the contract.

COVID-19 considerations: Although COVID-19 measures may not be relevant in the current context, these measures are provided as guidance in case of similar emergency scenarios occur in future. When such situations arise, it is imperative to assess and mitigate the risks of COVID-19 transmission among workers and to provide a safe environment for project workers and local communities. As a first step, contractors and workers on this project will:

- Adhere to all COVID-19 control protocols issued by the Government of Bhutan and provincial authorities, the WHO and the World Bank.
- Where necessary, prepare and implement site-specific measures (as part of the project OHS plan) to mitigate the risks of COVID-19 transmission among workers.
- Promote measures for preventing the spread of COVID-19 among host communities.

As part of E&S screening, contractors will assess the risks of COVID-19 transmission before undertaking project activities: site access, construction of labor camps, consultations with project stakeholders, and based on the assessment, ensure that basic COVID-19 protocols are observed such as maintaining social distancing and practicing safe hygiene. The Senior OHS Specialist will perform additional roles as the focal point for COVID-19 and coordinate site specific measures with local health authorities and community leaders. The World Bank's [Interim note: Covid-19 considerations in construction/civil works projects](#) may be referenced for further guidance on the assessment and management of COVID-19 risks at construction sites.

6.3 Code of Conduct for Project Workers

Contractors shall establish and enforce a Code of Conduct (CoC) applicable to all Contractor's Personnel, including employees, subcontractors, laborers, suppliers' personnel, and any other persons engaged in execution of the Works. The Code of Conduct is a mandatory contractual requirement and serves as a key instrument for promoting respectful behavior, preventing workplace misconduct, and addressing risks associated with labor influx, including SEA/SH.

The Code of Conduct shall:



- Commit all personnel to acceptable standards of professional and personal behavior
- Prohibit discrimination, harassment, exploitation, violence, and unsafe conduct
- Explicitly prohibit SEA/SH and sexual activity with persons under 18 years of age (except for legally recognized pre-existing marriage)
- Require compliance with occupational health and safety requirements
- Prohibit retaliation against any person raising concerns or using grievance mechanisms.
- Establish sanctions for violations, including disciplinary measures up to termination and referral to legal authorities.

Each worker shall:

- Receive a copy of the Code of Conduct as part of the employment contract
- Be provided with an orientation explaining its contents in a language they understand
- Sign an acknowledgment confirming receipt and understanding.
- Be informed that adherence to the Code of Conduct is a mandatory condition of employment.

The Code of Conduct shall be displayed in locations accessible to workers and, where appropriate, in areas accessible to local communities and project-affected people. The full text of the Code of Conduct is provided in **Annex 1** of this LMP.

6.4 Prevention of Labor influx Risks and SEA/SH

Given the large number of workers expected during peak construction and the reliance on migrant labor, the Project recognizes the risk of labor influx and associated SEA/SH risks. Contractors shall take proactive measures to prevent such risks in accordance with ESS2, ESS4, and the Project's SEA/SH Action Plan.

Contractors shall:

- Have received a copy of the CoC as part of their (labor's) work contract.
- Understand the contents of the CoC and dos and don'ts, and also the COC to them as part of the orientation/induction process.
- Acknowledged that adherence to the CoC is a mandatory condition of employment; and
- Understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.
- A copy of the CoC in the languages comprehensible to workers will be displayed in a location easily accessible to the community and project-affected people. Contractors must address the risk of SEA/SH through
 - Mandatory periodic orientation/training and awareness-raising for the workforce about refraining from unacceptable conduct with local community members, specifically women and children
 - Informing workers about national laws, particularly provisions related to SEA/SH, to make them understand that SEA/SH cases are punishable offence and can be prosecuted.
 - Adopting a policy of providing full cooperation to law enforcement agencies in investigating complaints related to SEA/SH.
 - Ensure zero tolerance for SEA/SH and other forms of gender-based violence.
 - Cooperate fully with law enforcement authorities in investigating SEA/SH complaints.



- Implement supervision and monitoring systems within camps and worksites to discourage misconduct.
- Ensure camp management rules reinforce respectful conduct toward local communities, particularly women and children

A grievance redress mechanism for recording and addressing SEA/SH-related complaints is incorporated as part of the project GRM and outlined in the project SEP. An additional GRM process, as required by ESS2, is presented in Chapter 10 and will be used to respond to SEA/SH cases as required.



7. Age of Employment

7.1 Minimum Age of Employment

Considering the requirements of county laws, particularly the Labor and Employment Act of Bhutan, 2007, the Regulation on Working Conditions, 2022, the Regulation Occupational Health, Safety, and Welfare, 2022, the Regulation on Occupational Health and Safety for the Construction Industry, 2022 and World Bank ESS2, the minimum age for employment in the DHPP is fixed at 18. The DHPP, through contractors and subsequent subcontractors, ensures that no person under the age of 18 will be involved in any construction activities under the Project.

The Project adopts a zero-tolerance policy toward child labor, given the hazardous nature of hydropower construction activities, no person under the age of 18 shall be employed or engaged in any construction or site-related activities under the Project. This requirement applies to direct workers, contracted workers, subcontractors, community workers, and primary supply workers, where relevant.

DHPL shall monitor contractor compliance through periodic audits and inspections of personnel records. Non-compliance with age requirements shall constitute a serious contractual breach and may result in penalties, suspension of works, or contract termination.

7.2 Age certification Procedure

To prevent child labor, strict age verification procedures shall be implemented during recruitment. Before engaging any worker, the employer will ask for evidence to certify the worker's age during the recruitment process. Acceptable documents include:

- Citizenship Identity Card
- Birth Certificate
- School Leaving Certificate
- Passport and a valid work permit (for foreign workers)
- Health Card or other government-issued identification showing date of birth.
- Copies of verified documents shall be retained in personnel files.

Copies of verified documents shall be retained in personnel files.

In case of doubt regarding the age of a prospective worker, the employer may seek clarification from the Labor Inspector, as per Section 174 of the Labor and Employment Act, 2007, who may refer any of the documents issued by the competent authorities.

Contractors shall ensure that recruitment agents, particularly for foreign workers, comply with age verification requirements prior to mobilization.

7.3 Procedure if Underage Worker is Identified

If a worker under 18 years of age is found working on the Project, the following steps shall be taken:

- Immediate removal of the individual from all work activities.
- Investigation to determine the cause of the recruitment failure.
- Reporting to the relevant labor authority in accordance with national law.
- Implementation of corrective actions, including strengthened recruitment controls and contractual measures against responsible contractors or agents.

Removal of an underage worker shall not result in punitive action against the child, and appropriate measures shall be taken to ensure their safety and welfare.



8. Terms and Conditions

This chapter sets out the terms and conditions of employment applicable to all project workers engaged under the DHPL, in accordance with national regulations discussed in Sections 4 and 5, and World Bank ESS2. The provisions apply to direct workers employed by DHPL, contracted workers engaged by contractors and subcontractors and consulting firms, and, where relevant, primary supply workers.

8.1 Engagement of Foreign and Migrant Workers

Recognizing that migrant workers may face elevated risks of exploitation, discrimination, excessive recruitment costs, unsafe working conditions, or restrictions on freedom of movement, the DHPL shall implement the following measures in accordance with ESS2, the Labor and Employment Act of Bhutan (2007), and the Rules and Regulations on Foreign Workers Management, 2024:

- Ensure that all foreign and migrant workers are recruited through lawful, licensed, and transparent recruitment processes consistent with national regulations
- Prohibit the charging of recruitment fees, placement fees, or related employment costs to workers, whether directly or indirectly
- Prohibit retention, confiscation, or restriction of access to passports, work permits, or other identity documents by employers, contractors, subcontractors, or recruitment agents
- Require written employment contracts in a language understood by the worker, clearly specifying wages, working hours, overtime rates, leave entitlements, accommodation arrangements (where applicable), and termination conditions
- Ensure equal treatment of migrant workers with respect to wages, working hours, overtime compensation, occupational health and safety protections, access to medical care, and access to grievance mechanisms
- Provide access to adequate worker accommodation that complies with national standards and Good International Industry Practice where accommodation is provided
- Ensure migrant workers have unrestricted access to the Project's Worker Grievance Mechanism without fear of retaliation
- Require contractors to make appropriate arrangements for repatriation upon completion or termination of employment, in accordance with national law and contractual obligations.

8.2 Specific Wages, Hours and Other Provisions that Apply to the Project

8.2.1 Wages and Payment

All wages paid under the DHPL shall comply with the Labor and Employment Act of Bhutan (2007) and applicable wage regulations, including the Daily Minimum National Wage as periodically revised by the Government. Wages, overtime rates, and working conditions shall not be less favorable than those prescribed under national legislation.

Wages shall be:

- Clearly specified in written employment contracts
- Paid regularly and directly to workers
- Free from unlawful deductions



- Paid in accordance with the terms agreed between employer and employee; however not in contravention to the national law and not lower than the prescribed requirements under applicable law. Better provisions compared to the national regulations can be provided.
- Monthly wage payment supplemented with wage slip which should provide a detailed breakdown of working days, leave days, OT hrs, OT payment, other deductions, additional allowances, etc. and shall be distributed to workers in presence of DHPL staff
- The basis for wage calculation should be based on the correct interpretation of the law and should be based on actual working hours details.

Any statutory allowances, including travelling and subsistence allowances, shall be provided where applicable.

8.2.2 Overtime and Payment

- Given the nature of hydropower construction, including tunnelling and continuous operations, work may be organized in multiple rotating shifts, including scheduled night shifts. Work performed as part of an employee's regular assigned shift, whether day or night, shall be compensated at the agreed normal wage rate at minimum and supplemented with OT payment provisions depending upon night work, OT work, work on weekly off, annual leave days, public holidays, etc.
- Overtime refers to work performed beyond the employee's assigned shift hours.
- An employee shall be entitled to overtime payments at a rate not less than the normal rate of pay. Overtime work shall be performed only upon mutual agreement between the employee and the employer and should not exceed the permitted hours per day, week or quarter as per local regulation.
- Minimum breaks and rest time provisioned under law should be included in the definition of the normal shift hours (8hrs) and should not be counted exclusive of normal shift hrs (i.e 8 hrs).
- Where an employee is required to perform work beyond their assigned shift, including additional work between 10:00 pm and 8:00 am outside their normal duty roster, the employer shall pay an additional 50% of the worker's normal rate of pay for those overtime hours. Similar provisions should be applied for night shift.
- All overtime hours shall be properly recorded and reflected in wage payments.

8.2.3 Leave Entitlements

In accordance with the Regulation on Working Conditions (2022), workers shall be entitled to:

- Annual leave at a minimum rate of 1.5 days per month (minimum 18 working days per year) after probation
- Paid sick leave of at least 5 working days per year
- Paid casual leave of at least 5 working days per year after completion of probation period.
- Maternity leave of 2 months
- Paternity leave of 10 days
- Public holidays-minimum of 9 days
- Weekly off of 1 day in a week

8.2.4 Compensation and Insurance benefits



In accordance with Section 96 of the Labour and Employment Act, employers shall compensate workers for:

- Death due to a work accident or occupational disease
- Total permanent disablement
- Temporary partial disablement.

All workers shall be insured against workplace accidents, with insurance premiums borne by the employer.

8.3 Maximum number of hours that can be worked on the project

Normal working hours under the DHPP shall not exceed:

- Eight (8) hours per day
- Forty-eight (48) hours per week.
- Sixty hours per week including OT, should the worker agree to do OT and paid as per applicable law.

Work schedules, including multi-shift and night shift operations, shall be structured so that total working hours remain within statutory limits.

Workers shall be entitled to:

- A minimum rest break of 10 minutes after every 2 hours of continuous work
- Not less than 30 minutes of total rest and meal breaks during an 8-hour work period
- At least one full rest day per week.

Total working hours, including overtime, shall be managed to prevent excessive fatigue, particularly in high-risk construction activities such as underground works, blasting, heavy equipment operation, and work at height.

8.4 Collective Agreements that Apply to the Project

At present, no formal collective bargaining agreements specifically apply to the DHPL.

If any legally recognized collective agreements become applicable during the Project lifecycle, the SPV and contractors shall comply with their provisions, provided such agreements are consistent with/ or have better provisions over and above the national legislation and ESS2 requirements. However, the CBA in no instance should be less beneficial and therefore contravene applicable regulations.

Health and Safety Committees established under national regulations shall support worker participation in workplace matters, but shall not substitute for collective bargaining arrangements where legally applicable.

8.5 Other Specific Terms and Conditions

8.5.1 Non-Discrimination

In accordance with Section 11 of the Labor and Employment Act, employers and employment agents shall not discriminate against employees or job applicants in recruitment, dismissal, transfer, training, promotion, or demotion. Equal opportunity principles shall apply to all employment decisions.

8.5.2 Written Contracts of Employment



All project workers shall receive written employment contracts signed by both the employer and employee. Contracts shall specify among others:

- Duration of employment
- Nature of work or specific task.
- Wages and payment terms.
- Working hours and overtime provisions.
- Probation period.
- Leave entitlements.
- Notice period for termination

8.5.3 Preferential Recruitment

Members of the project affected households, community members residing in the Project area, particularly from the Mongar and Lhuentse Dzongkhags will be given preference during hiring of the project workers. Employment to foreigners shall be permitted for the occupations against which Bhutanese are either not available or not willing to work.

8.5.4 Termination of Employment

Employment contracts shall specify a notice period of not less than 30 days for termination.

Upon termination of employment, employers shall:

- Pay all outstanding wages within 7 calendar days.
- Settle accrued leave and other benefits.
- Provide required release documentation and employment records.

8.5.5 Demobilization of Workers

Upon completion of engagement or termination:

- Workers shall receive written notice at least 30 days in advance. The notice will include the effective date of demobilization, details of final payments and entitlements, and Information on the grievance mechanism
- Workers will be demobilized in a fair, just, and transparent manner
- All outstanding wages, overtime payments, unused leave compensation, and accrued benefits shall be settled prior to demobilization.
- Accident and health insurance coverage shall remain valid until demobilization is complete.
- Foreign workers shall be provided with necessary travel permits, medical clearances, and release documentation to ensure smooth departure from Bhutan.
- Access to the Workers' Grievance Mechanism shall remain available for 30 days after demobilization for the resolution of any outstanding disputes, such as final settlement of payments, harassment or misconduct.

8.5.6 Working condition:

In addition to the requirement that all employees will be insured against any workplace accident that may results in temporary or permanent injuries, leading to disabilities, and deaths, the DHPL will ensure that the contractors and sub-contractors will adhere with the country laws that define the minimum standards of labor accommodation, hygiene, and other logistics, including safe water supply,



waste management, and adequate lighting and airflow in the rooms to be provided to the laborers. The laws also require an employer to provide and maintained accommodation for employee for the entire contract period including any time extension.



9. Project Accommodation Camps

The DHPP will construct nine Construction Contractor Facilities (CCF) - workers' camps - with a total capacity of 6,347 workers. The CCF 9, which will be constructed at Lingmithang, will house 1,390 workers for the construction works of the powerhouse and will be the largest CCF among the planned nine CCFs with an estimated area of 33.15 acres. Similarly, the second largest CCF with an area of 10.03 acres will host 1,029 workers and will be constructed at Tagkhambi. The table below provides some features of the planned CCFs.

Camp layout plans, including environmental and sanitation infrastructure, shall be submitted as part of the Contractor's C-ESMP for review and approval before establishment.

Table 9.1: Capacity and area of the Construction Contractor Facilities

CCF ID	Works	Capacity of CCF	CCF area (Acres)
CCF1	Head work (Dam, Diversion tunnel and coffer dam)	1,029	10.03
CCF2	HRT & Adit I	172	2.24
CCF3	HRT& Adit II	686	7.58
CCF4	HRT& Adit III	686	5.19
CCF5	HRT& Adit IV	686	9.18
CCF6	Powerhouse	154	4.50
CCF7	HRT& Adit V	686	9.72
CCF8	HRT& Adit VI - Surge shaft & Pressure shaft	858	14.34
CCF9	Powerhouse	1,390	33.15
Total		6,347	95.92

9.1 Design standards for workers' accommodation

The Regulation on Occupational Health and Safety for the Construction Industry, 2022 of Bhutan, provides a regulatory framework and details the national requirements related to labor accommodation. Similarly, IFC/EBRD Guidance Note Workers' Accommodation: Processes and Standards (2009)¹ outlines the requirements related to workers' accommodation in a project funded by the IFC and EBRD.

The Contractor shall design and manage the CCFs in compliance with both Bhutanese national regulations and the IFC/EBRD guidance. In cases where there is any discrepancy or gap between national regulations and the IFC/EBRD standards, the Contractor shall apply the more stringent requirement.

¹ Weblink to Workers' accommodation: processes and standards - A guidance note by IFC and the EBR: <https://documents1.worldbank.org/curated/en/604561468170043490/pdf/602530WP0worke10Box358316B01PUBLI C1.pdf>



The required design standards for workers' accommodation are summarized in Table 9.2, which compares Bhutan's regulatory requirements with IFC/EBRD benchmarks and identifies areas of alignment or gaps.

Table 9.2: Design standards on workers' accommodation as per Bhutan's Regulations and IFC/EBRD Guidance

Requirements	Bhutan's laws	IFC/EBRD standards	Gaps/alignment
Safety of CCFs	Section 73 of the Regulation on Occupational Health and Safety for Construction Industry, 2022 says that the living accommodation for employees should be constructed at the safest place where there is no risk of flooding, landslide, collapse hazards, falling boulders and other elements.	Under the Benchmarks of general living facilities, the guidance notes by IFC and the EBRD on workers' accommodation say that the living facilities are located to avoid flooding and other natural hazards.	Aligned
Fire Protection	Section 29 of the regulation requires an effective fire extinguishing equipment, reliable as per the workplace activity to sufficiently extinguish any probable fire at the construction site.	The guidance notes call for fire extinguishers, fire alarms, number and size of staircases and emergency exits, restrictions on the use of certain building materials	Aligned
Room/dormitory facilities	Schedule III of the regulation states that there should be one room for every 4 employees with adequate headroom and movement space and the size of the room shall be at least 3.5 m2 per person.	- The benchmarks for Room/dormitory facilities ask for minimal floor space of 4 to 5.5 square meters per resident, with a minimum ceiling height of 2.10 meters of the collective room for 2 to 8 workers.	Aligned
Flooring	Schedule III of the regulation states the floors of each room shall be constructed of wood or concrete and wooden floors shall be elevated not less than 1 ft above the ground level at all points to prevent dampness and to permit free circulation of air beneath.	- The benchmarks states that rooms and dormitories are built with easily cleanable - flooring material.	Aligned
Wall	Section 11 of the Regulation requires the wall of the bedroom and the kitchen to be constructed preferably with ply boards of at least 10 mm thickness (or equivalent) and	No specific requirements of wall specification for bedroom except that the wall surfaces adjacent to cooking	Aligned

Requirements	Bhutan's laws	IFC/EBRD standards	Gaps/alignment
	CGI/ PPI Sheet for roofing. While, both walls and roof of the toilets should be constructed with CGI/ PPI sheets (or equivalent).	areas are made of fire-resistant materials	
Electrical system and hazardous materials	Schedule III of the regulation states there should not be any exposed live wire or unattended electrical switches & sockets in the living accommodation, and combustible, explosive, and highly flammable materials stored in the living accommodation.	- The benchmark asks health and safety management plans including electrical, mechanical, structural and food safety have - been carefully designed and are implemented.	Aligned
Food and personal hygiene	Schedule III of the regulation ask for an adequate and convenient water supply for drinking, cooking, bathing, and laundry purposes, maintaining good sanitation and hygiene and taking measures to prevent the spread of diseases, especially communicable diseases	- The benchmark asks to maintain good food hygiene practices, including protection against contamination during food preparation with - adequate personal hygiene including enough washbasins designated for cleaning hands with clean	Aligned
Drinking Water and water supply	Section 73 of the Regulation says that every construction site shall have access to sufficient supply of safe drinking water for workers.	The benchmarks ask for water ask for access to an adequate 80 to 180 liters of water per person per day and drinking water meets national/local or WHO drinking water standards	Aligned
Illumination and ventilation	Section 59 of the regulation requires employer to ensure that sufficient illumination at the worksite, passageways, stairways and landing. Schedule III ask for adequate ventilation to ensure sufficient movement of air in all conditions of weather and climate.	- The benchmarks for heating, air conditioning, ventilation and light asks for both natural and artificial lighting maintained in living facilities.	Aligned
Heating and air conditioning	Section 97 of the regulation says that the temperature in any working chamber, man-lock or medical lock in a worksite shall not exceed 29°C and	The benchmarks for heating, air conditioning, ventilation and light requires the temperature is kept at a level of around 20 degrees Celsius for facilities located in cold weather zones.	Partially aligned

Requirements	Bhutan's laws	IFC/EBRD standards	Gaps/alignment
		•	
Wastewater and solid waste	Schedule III of the regulation states that the accommodation should maintain good sanitation and hygiene (proper drainage system, proper waste management, good housekeeping, etc.	- Wastewater, sewage, food and any other waste materials are adequately discharged, in compliance with local or World Bank standards – whichever is more stringent.	Aligned
Bed arrangement and storage facilities	No regulatory requirements	- The benchmarks say that a separate bed for each worker should be provided with a minimum space between beds of 1 meter along with facilities for the storage of personal belongings.	Not aligned
Showers/bathroom and facilities	Schedule III of the regulation asks for a separate pour-flush toilet with or separate bathroom, washing facilities for male and female shall be provided with one toilet cum bathroom for every six users, and the size of the toilet shall comply with the Building Code of Bhutan.	- The benchmarks ask for adequate number of bathrooms and toilet facilities are not shared between men and women. While ensuring adequate privacy, an adequate number of toilets is provided to workers with standards range from 1 unit to 15 persons to 1 unit per 6 persons and 1 unit to 15 persons for urinals.	Aligned
Canteen, cooking and laundry facilities	Section 71 of the regulation requires employer to provide a canteen, sanitary conveniences, lunchroom, washing facilities and changing rooms in every workplace.	The benchmarks say that canteens should have a reasonable amount of space per worker (1-1.5 square meter) with adequate furnishing and utensils, and good food hygiene practices.	Partially aligned
First aid facilities	Section 71 of the regulation requires the employer ensure enough first aid boxes for providing first aid to the employees.	The benchmark on medical facilities asks for maintaining an adequate number of first aid kits.	Aligned
Tele-communication facilities	Section 71 of the regulation requires the employer to always maintain effective and reliable means of communication.	The Benchmark asks for access to public phones and internet facilities if there are	Partially aligned

Requirements	Bhutan's laws	IFC/EBRD standards	Gaps/ alignment
		many third-country migrant workers.	

9.2 Supplementary Requirements to meet IFC/EBRD Standards

The Regulation on Occupational Health and Safety for the Construction Industry, 2022 of Bhutan, is mostly aligned with the requirements of the IFC/EBRD guidance notes for workers' accommodation. However, there are a few IFC/EBRD benchmark requirements that are either not explicitly detailed in national regulations or require further specification to ensure full compliance with international good practice.

Accordingly, the following supplementary requirements shall apply to the design, construction, and management of CCFs. These requirements are mandatory and shall be incorporated into the C-ESMP and camp design documents.

- **Heating and Ventilation:** On the heating and air conditioning requirements, the locations of CCFs are in the high hills in the northern part of the country, where the average annual temperature in the project area, according to project ESIA, remains between 15°C and 24 °C. As national regulations do not prescribe detailed thermal comfort standards, the Contractor shall ensure that:
 - All sleeping rooms and common areas are adequately ventilated (natural or mechanical ventilation).
 - Indoor temperature remains within a safe and comfortable range, including provision of heating during colder periods where necessary.
 - Windows, airflow, and insulation are designed to prevent excessive heat loss or condensation.
 - Thermal comfort measures shall be documented in the camp design submission.
- **Sleeping Space and Bed Arrangement:** Though the national laws of Bhutan do not mention the requirement of IFC/EBRD benchmarks on the need for a separate bed for each worker with a minimum space between beds of 1 meter, along with facilities for the storage of personal belongings, the contractor shall ensure that:
 - Each worker is provided with an individual bed (bed sharing is strictly prohibited).
 - A minimum clear space of 1 meter is maintained between beds.
 - Each worker is provided with adequate and secure storage space for personal belongings.
 - Sleeping areas are not overcrowded and allow safe circulation and privacy.
- **Space in Canteens** Regarding the requirement for a reasonable amount of space per worker (1-1.5 square meters) in canteens, the DHPL shall ensure that canteens, rest areas, and recreational spaces are adequately sized to prevent overcrowding. . The Contractor shall ensure that:
 - Design canteens, dining halls, recreation rooms, and other communal facilities based on peak camp population and realistic shift patterns.
 - Provide sufficient seating capacity to ensure that workers can dine comfortably without congestion or excessive waiting time.

- Ensure adequate floor space per occupant in dining and recreational areas, consistent with international good practice.
 - Maintain clear circulation pathways and unobstructed emergency exits;
 - Provide adequate natural or mechanical ventilation, lighting, and thermal comfort in all communal areas.
 - Establish routine cleaning and sanitation schedules to maintain hygienic conditions.
- **Communication Facilities:** Consistent with IFC/EBRD guidance, workers residing in accommodation facilities shall have reasonable access to communication with families and external contacts, particularly where migrant or foreign workers are engaged. On the requirement of access to public phones and internet facilities, if there are many third-country migrant workers, Bhutan has good mobile phone and internet access in the project area, and the use of mobile phones for voice and internet among national and migrant workers is widespread. So, it is expected that the workers themselves will manage access to voice and internet by purchasing the services from telecom vendors in the local market. If needed, the contractors will facilitate the workers in ensuring access to such services. The contractor shall ensure that
 - Provide adequate facilities to ensure access to mobile and internet services (e.g., adequate network coverage, access to charging points, or information on service providers) within the camp area.
 - Workers' freedom of communication is not restricted by camp rules or management practices.
 - Personal mobile phones are not confiscated or unreasonably controlled.
 - Camp management does not impose arbitrary limitations on contact with families.
 - **Compliance Verification Prior to Occupation:** Prior to occupation of CCF, the contractor shall demonstrate compliance with both national regulatory requirements and IFC/EBRD accommodation standards. The Contractor shall
 - Conduct a self-assessment using the checklist on workers' accommodation, which is provided in Annex 1 of the [Workers' Accommodation: Processes and Standards: A guidance note by IFC and the EBRD](#).
 - Prepare a documented compliance report identifying conformity with each applicable benchmark.
 - Clearly identify any gaps and implement corrective actions prior to worker mobilization.
 - Submit the compliance assessment report, including photographic evidence and layout plans, to DHPL for review and approval.

10. Workers GRM (W-GRM) Process

10.1 Purpose and Scope

The Project will establish a Workers' Grievance Redress Mechanism (W-GRM) in accordance with the requirements of ESS2. The W-GRM will be available to all direct workers and contracted workers to ensure easy accessibility to a responsive and functioning mechanism through which they can raise complaints, questions, concerns, and suggestions related to labor and working conditions.

Recognizing that workplace concerns are often distinct from issues raised by project-affected parties and other stakeholders, the Project will establish a dedicated two-level W-GRM that is separate from, but complementary to, the Project grievance mechanism established under the ESS10. The W-GRM is specifically designed to address workplace-related grievances in a manner that is confidential, fair, transparent, and timely.

The W-GRM applies to:

- Direct workers employed by DHPL including staff, consultants, and supervisory personnel
- Contracted workers employed by contractors and subcontractors engaged under the Project
- Migrant workers engaged under the Project
- Primary supply workers, where relevant to Project activities.

The W-GRM does not replace or impede access to judicial or administrative remedies available under Bhutanese law. Workers retain the right to pursue such remedies at any stage.

10.1 Principles of the W-GRM

The proposed W-GRM will be based on the following principles:

- **Accessibility:** The W-GRM will be accessible to all direct and contracted workers without cost. Multiple grievance uptake channels shall be available, including verbal and written submissions. Workers are informed about the W-GRM and its functioning procedures during earlier recruitment, induction and throughout project duration in a manner that is clear, understandable, and accessible to them, including in languages commonly spoken by the workforce.
- **Transparency and Fairness:** The mechanism shall operate in a transparent manner, with clearly defined procedures and timeframes. All grievances received through various channels (verbal, written, suggestion boxes, project website or social media platforms, among others) shall be kept informed of the steps taken and the outcome of the grievance process.
- **Timeliness:** The W-GRM shall ensure prompt acknowledgment, investigation, and resolution of grievances within defined timeframes. The mechanism shall aim to provide fair and reasonable resolution of grievances at the earliest possible stage.
- **Confidentiality:** Grievances shall be handled confidentially, particularly where sensitive issues are raised, including allegations of harassment, discrimination, or SEA/SH. Anonymous grievances shall be accepted and treated with the same seriousness as identified grievances.
- **Protection Against Retaliation:** Workers shall be protected against any form of retaliation, reprisal discrimination, or adverse employment consequences for raising grievances in good faith. The SPV and Contractors shall enforce a zero-tolerance policy for retaliation.
- **Worker Participation:** The mechanism shall allow the complainant to participate directly in the grievance resolution process. Workers shall have the opportunity to provide additional information, clarify concerns, and accept or reject proposed resolutions.



- The complainant is kept informed of the steps being taken under the procedure and of the action taken on the grievance.
- **Right to Appeal and External Remedies:** If a worker is not satisfied with the proposed resolution at the initial level, the worker shall have access to an appeal mechanism at the Project level. Participation in the W-GRM shall not prevent workers from seeking other available legal or administrative remedies under Bhutanese law.
- **Special Handling of SEA/SH Complaints:** Complaints related to Sexual Exploitation and Abuse or Sexual Harassment (SEA/SH) shall be handled through a separate, survivor-centred process in accordance with the Project's SEA/SH Action Plan and SEP, ensuring confidentiality, informed consent, and protection of the survivor.

10.2 Description of the W-GRM

To ensure effective, timely, and accessible resolution of workplace-related grievances, the Project shall implement a two-tier W-GRM consisting of:

- Level 1 – Contractor-Level W-GRM, and
- Level 2 – DHPL-Level W-GRM (Project Level Appeal Mechanism).

This structure ensures that most grievances are resolved at the site level while maintaining independent oversight by the SPV.

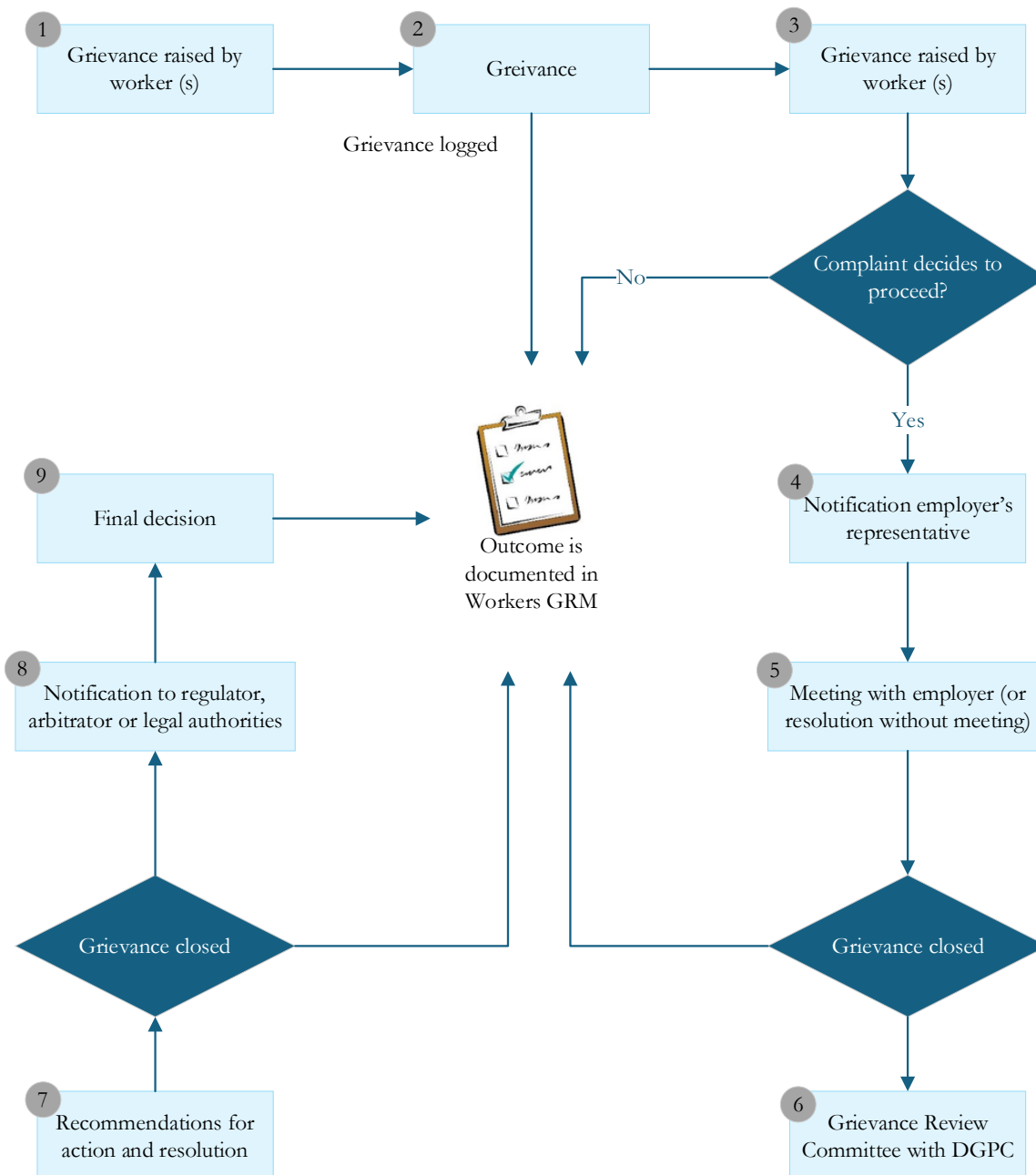
Level 1: Contractor-Level W-GRM

Each contractor shall establish and maintain an in-house W-GRM at their respective project site office. This shall serve as the first level of grievance resolution for contracted workers. The Contractor-level W-GRM Committee shall be composed of:

- Contractor's on-site labor in-charge officer (chair)
- Contractor's HR/labor officer
- Contractor's HR/Labor officer,
- Contractor's social officer, and
- A worker's representative.

The contractors, in collaboration with the DHPL, will ensure that committee members receive appropriate training on grievance handling procedures, confidentiality, non-retaliation, and ESS2 requirements. Figure 10.1 presents the procedural flow of the W-GRM established under the Project.





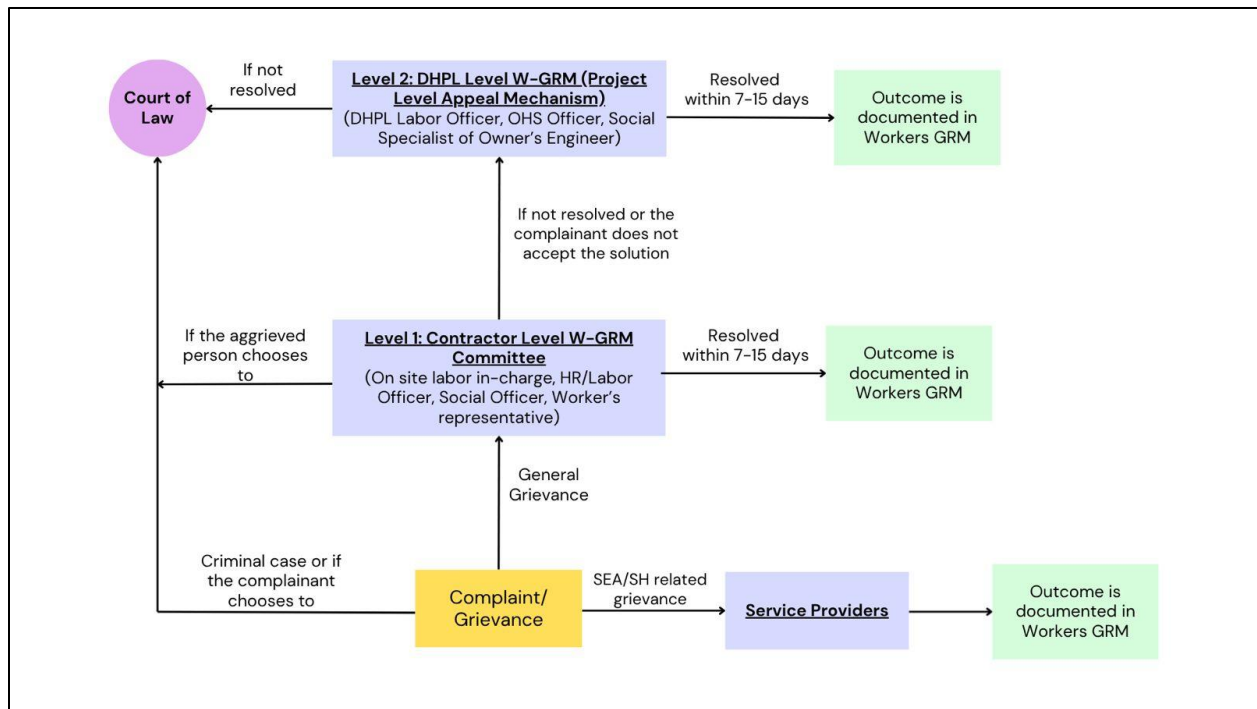


Figure 10.1: Procedural Flow of W-GRM of the Project

The Level 1 W-GRM will register and address the workers' complaints promptly. Any resolution developed by the Level 1 W-GRM will inform to the petitioner and if not satisfied with the outcome of the in-house W-GRM, the complainant can file the complaint to Level 1 of the project GRM housed at the DHPP site office. The first level DHPP GRM comprises a sequential and time-bound process to receive and address all complaints, including those related to feedback and grievances, as explained in Table 10.1.

Level 2: SPV-Level W-GRM (Appeal Mechanism)

If the Contractor-level W-GRM fails to provide a resolution within the 7-15 days or the complainant is not satisfied with the proposed resolution, the grievance may be escalated to the DHPL-Level W-GRM for review.

The DHPP/SPV-Level W-GRM shall be housed within the SPV and shall comprise the following staff:

- ESHSD Communication Officer
- ESHSD OHS Manager or designated OHS Officer
- ESHSD Social Specialist
- Representative of the Owner's Engineer (as observer/advisor)
- Contractor representative (as invitee, where relevant).

The DHPL-Level W-GRM shall review the grievance file and the resolution proposed at Level 1, conduct additional investigation where necessary, and issue a reasoned decision within the defined timeframe. The final project-level decision shall be communicated to the complainant in writing, and where corrective measures are required, the SPV shall ensure their implementation. If the complainant accepts the decision, the agreed corrective actions shall be carried out, and the grievance shall be

formally closed. If the complainant remains unsatisfied, the worker retains the right to pursue available remedies under Bhutanese labor laws, including referral to the Labor Inspector or competent judicial authorities.

Table 10.1: Indicative steps and activities of the W-GRM

Step	Description of process	Timeframe	Responsibility
Grievance uptake Channels	- W-GRM can be submitted to the Project's General Grievances Register desk via the following channels - Toll-free telephone hotlines established by the contractors: 975- XXXXXXXXXXXX 975- XXXXXXXXXXXX 975- XXXXXXXXXXXX - Short Message Service (SMS) to 975- XXXXXXXXXXXX - Emails: - Letter to DHPP or contractors - Grievance or suggestion boxes located at the labor camps. - Social media platforms, such as Facebook - Filling out and submitting a grievance form (Annex 2) at the project site office or contractors' offices.		
Receive, acknowledgement and follow-up	- The contractor's OHS specialists present at the site office is to receive all the workers' grievances registered through all the available uptake channels, acknowledge the receive through formal registration of the grievance, and assign a unique case number to the complaint - In case of the complaint related to SEA/SH, such complaint will be referred to the SEA/SH GBV Focal Person for further proceedings as envisaged in the SEP. A consent for release of information will be obtained from the survivor, if required (Annex 6) and other grievances not related to labor and working condition and OHS are forwarded to Project Grievance. - Any workers' complaint received by the Project GRM is forwarded to Level 1 W-GRM established at the contractors' site offices.	As soon as possible, or no later than 3 days after the complaint is received.	OSH officer of the contractors Labor officer of the DHPP
Sorting, Verification, processing investigation, and action	Once acknowledged, the Level 1 W-GRM committee will initiate the investigation into the complaint, which will be led by the Contractor's OHS specialist at the site office. The committee led by Contractor's HR/Labor Officer will comprise of Contractor's OHS specialist,	Within 15 days	Site In-charge of the contractor

Step	Description of process	Timeframe	Responsibility
	Contractor's gender specialist, Owner's Engineer's social specialist, and a representative of the workers. The Level 1 W-GRM Committee will develop a resolution within 15 days of the formal registration of the grievance. • If required, the Contractor's OHS specialist can contact the complainant to seek further clarification or information related to the complaint. • A proposed resolution formulated by the WGRM Level 1 committee will be verbally communicated to the complainant by Contractor's OHS specialist within 5 days of the decision on resolution either by calling the complainant or meeting in person. • The focal person will prepare a written notification of the resolution as per the format given in Annex 4 and hand over the resolution within 10 days either by meeting in person or sending it through the post or sending a scanned copy of the resolution in a personal electronic account of the complainant. In either case, the Contractor's OHS specialist will confirm the receipt of such resolution by the complainant. The Contractor's OHS specialist will ask the complainant for a written acceptance of the resolution if he/she is satisfied with the resolution within 15 days of the receipt of the resolution. If not, the complainant can inform the Contractor's OHS specialist about his or her decision to reject the resolution with reasons. • If accepted by the complainant, the actions agreed in the resolution will be implemented and the case will be formally closed by using a grievance close-out form provided in Annex 3 once the implementation of the agreed actions is completed.		
Appeals process	• Level 2 GRM committee: If the complainant does not accept the proposed solution, the Contractor's OHS specialist shall refer the Case to the Level 1 of the Project GRM. The W-GRM Committee will be comprised of DHPP labor officer, DHPP OHS officer, and Social Specialist of Owner's engineer. The Level 1 of the Project GRM will invite the OHS specialist of the concerned contractor as the invitee members of the committee. The Level 2 W-GRM committee will hand down a resolution within 15 days from	15 days	E&S Manager, and Contractor's HR



Step	Description of process	Timeframe	Responsibility
	the date of the official notification from the complainant informing about the decision to reject the resolution developed by the Level 2 WGRM Committee. - The Level 1 of the contractor's OHS specialist will formally notify the complainant about the resolution of the Level 2 W-GRM committee and will ask the complainant to accept or reject the resolution within 15 days after the date of the notification. - If the complainant accepts the resolution, the GRM focus person will take a written statement of such acceptance and will immediately take necessary actions to implement the agreed resolution. If the complainant does not accept resolution proposed by the Level 2 GRM Committee, then the complainant can choose any available legal course.		
Monitoring and evaluation	Data on grievances/complaints are to be collected in every two weeks by W-GRM focal person and communicated to the Owner's Engineer's Sociologist and contractor's Site in-charge.	Every two weeks	Contractors OHS officer
Provision of feedback	Feedback from complainants regarding the implementation of the agreed actions in the resolution is collected every month until the resolution is fully implemented, and the grievance case is formally closed.	Every month	Contractors OHS officer
Training	- Training requirements for staff/consultants in the WGRM of the contractor, and Owner's Engineer will be identified and budget. - The Project plans to organize a comprehensive training/orientation on GRM management, including the W-GRM and will be organized for the key DHPP's corporate office and its site-based staff/consultants, contractors, and Consultants of the Owner's engineer within three months after the contractors are mobilized. - Refreshment training will be organized every year to the concerned specialists of the Owner's Engineer and Contractors.	Capacity building need assessment to be conducted one month after the financial closure.	Labor officer of DHPP, social specialist of Owners' engineer and Contractors OHS officer

If any W-GRM related to SEA/SH among the workers is filed, such a complaint will immediately be referred to the SEA/SH Focal person, and the case will proceed through a separate SEA/SH GRM as provided in the Project GRM and explained in Section 6 of the SEP

(<https://www.dorjilung.bt/environment-and-social-documents/>). The grievance mechanism will allow workers to use other dispute procedures available as per the country's regulatory framework.



11. Contract management

11.1 Selection of Contractors

DHPL will use the World Bank Standard Procurement Documents for Works for solicitations and contracts, including labor and occupational health and safety requirements. DHPL will make reasonable efforts to ascertain that the contractor who will engage contract workers is legitimate and reliable entities and able to comply with the relevant requirements under the LMP. DHPL will make sure that such requirements are included in the bidding documents. To ensure the legitimacy and reliability of the contractors, the DHPL will collate and review the following information related to the interested contractors.

- Required business licenses, registrations, permits, and approvals as required by country's laws, such as EIA/IEE and borrower requirements, such as ESIA and LMP
- Company standardization under ISO certification and Environmental and Social Management Systems
- Information in public records or corporate registers relating to violations of applicable labor law, including reports from labor inspectorates and other enforcement bodies
- Records relating to warnings and fine for violating applicable labor law
- Records related to accident and fatality in the activities executed by the potential contractors, including notifications to the concerned authorities.
- Litigations filed by workers associated with the contractors.
- Records of safety and health violations and responses along with the outcomes.
- Information in public records of disputes with the workers over the timely payments of agreed payroll, overtime and other perks and benefits.
- Documents relating to the contractor's labor management system and OHS system, including HR policy/manuals, safety standards and use of PPEs in workplace.
- ESHS personnel of the contractors, their experiences, qualifications, and trainings related to management of workers and workplace.
- Records of successful execution of previous assignment, showing proper management of labor and working conditions.
- Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms reflecting ESS2.

11.2 Contractual Provisions and Non-Compliance Remedies

DHPL will incorporate the agreed labor management requirements as specified in the bidding documents into contractual agreements with the contractor, together with appropriate non-compliance remedies. Specifically, as the construction of the hydroelectric Project involves a large works contract, the Standard Bidding Document (SBD), as of July 2019, will be adopted. The revised SBD is fully aligned with the ESS2 requirements and contains ESHS guidelines, including non-compliance remedies. In the case of sub-contracting, the Project will require the contractor to include equivalent requirements and non-compliance remedies in their contractual agreements with sub-contractors.

11.3 Performance Monitoring and Reporting

DHPL will assign required resources and establish procedures for managing and monitoring the implementation of the LMP and the performance of the contractors to ensure that the contracts with



the owner's engineer or supervision consultants (and the third-party monitor, where applicable) explicitly set out their monitoring responsibility for the contractor's performance on labor and working conditions on a daily basis. The monitoring may include inspections, and/or spot checks of project locations or work sites and/or of labor management records and reports compiled by the contractor. Contractors' labor management records and reports that will be reviewed would typically include the following:

- Representative samples of employment contracts and signed code of conduct
- Periodic reporting of the implementation of the LMP, including grievances received from the community and workers, their resolution and implementation status.
- Records of periodic field visits to labor camps and workplace to understand working condition and labor management.
- Reports relating to fatalities and incidents and implementation of corrective actions.
- Records relating to incidents of non-compliance with national labor laws and regulations and the provisions of the LMP; and
- Records of training needs identification, Contractors' Training Schedule, and training provided for contracted workers to explain occupational health and safety risks and preventive measures.

DHPL will receive monthly reporting on the implementation of the LMP, including working conditions, orientation provided to workers, workers' grievance management, and any incidents and associated corrective actions, in coordination and cooperation with the owner's engineer or supervision consultants and contractors. DHPL will compile such monthly reports and prepare a quarterly LMP Implementation Status Report and share with the lenders.



12. Community workers

DHPL aims to implement the Community and Local Development Plan (CLDP) to foster community-driven development activities, with active participation from targeted beneficiaries and communities, ensuring that rural communities, including women and vulnerable groups, gain sustainable and tangible benefits from the large infrastructure project through tailored community-facing investments. In the participatory design of the CLDP, the Project aims to use community workers who are able and willing to engage in the construction of last-mile small-scale infrastructure, including wells, spring shed management, trails, and fencing, among others, selected through a participatory planning approach. Community workers, as defined by the ESS2, will be those providing voluntary services, with no or limited direct benefits, in the project activities that support activities aligned with the project development goals and extend direct benefits to their own communities.

12.1 Guiding Principles

While engaging community workers in the construction of last-mile infrastructures, the DHPP will be guided by entrain principles as stated below

- Voluntary participation in nature: Labor provided by community workers must be based on free and informed consent, agreed and documented through community consultations
- Clear Terms and Conditions: Clearly defined working hours, payment (if applicable), roles and responsibilities
- No engagement of the child or forced Labor in form
- Access to grievance Redress: The community workers will have access to the Project GRM established under the ESS 10.
- OHS requirement compliance: Application of OSH related requirements of the ESS2 and Good International Industry Practice (GIIP).

12.2 Engagement of community workers

Prior to the finalization of the CLDP, which is planned within 180 days of the effective date of the Financing Agreement of the Project, the DHPL will organize consultations with the targeted beneficiaries of the CLDP. During consultations, the DHPL aims to apprise the local and targeted communities of the scope of CLDP and to understand the small-scale development needs and priorities of the local community and local authorities. The DHPL will also conduct meaningful consultations with interested community workers to explain the terms and conditions of their engagement and obtain free and informed consent from such workers before they are engaged in project work.



12.3 Terms and condition of the community workers

The following terms and conditions will apply to community workers, and they will be clearly communicated to interested workers during community consultations and at the time of obtaining written consent before they are involved in CLDP activities.

- Age: The interested candidate for the community worker position should be at least 18 years old and be able to provide evidence of age, if required.
- Voluntary: The interested candidate will provide services in a prescribed manner on a voluntary basis, but this does not prevent them from receiving reimbursement for essential expenses such as transportation and light snacks. The payment for essential expenses, if applicable, together with the method and timing, will be agreed upon before engaging the community workers.
- Timing of engagement: Community workers will be engaged for a maximum of sixty days (60) spread over a period of six (6) months. They will work 4 hours a day on a flexible schedule, as agreed, based on the nature of the work.
- Consent agreement: Interested community workers are required to sign a consent agreement with the DHPP, which will include job descriptions and the terms and conditions of the assignment. and exit procedures, among others.
- Termination of the agreement: The community workers can terminate the agreement with a week's written notice without penalty, and such termination will end all future obligations associated with the assignment. Similarly, the DHPP may also terminate the agreement with a notice of 15 days with or without stating reasons for termination.
- Exclusion: Pregnant women and lactating mothers within 18 months post-delivery will not be allowed to be a community worker.
- Use of PPE and OHS standards: All community workers must agree to use the prescribed PPE as required by ESS2 and undergo an OHS orientation prior to engagement
- Accident insurance: All the community workers will be insured against accident death and injuries, and the cost of the insurance will be borne by the DHPP.

12.4 GRM for community workers

Community workers will have access to the project grievance mechanism established in the Stakeholder Engagement Plan (SEP) as per ESS10, and all grievance management procedures will apply to any complaint, including SEA/SH-related grievances, lodged by community workers.



13. Primary Supply Workers

13.1 Potential risks in primary supply workers

The construction works under the Project will require primary supplies, including construction materials essential for the functions of the priority infrastructure, such as aggregates, bitumen and precast concrete interlocking blocks. Some contractors may be able to produce such construction materials by their workforce. However, where the contractor will source (a) essential materials (b) directly from primary suppliers (c) on an ongoing basis, the workers engaged by such primary suppliers (that meet all three criteria (a) to (c)) are deemed “primary supply workers”, as defined in ESS2.

As discussed in Section 2 (Key Labor Risks), OHS risks, labor disputes, discrimination, and exclusion of vulnerable groups, forced labor, child labor, etc., are deemed to be generally significant in the construction sector, though risks of child labor and forced labor in the case of the Project is envisaged to be less. To address these potential risks, the following measures, as described in Sections 13.2 and 1.3, will be taken.

13.2 Selection of primary suppliers

When sourcing construction materials from primary suppliers, the contractor will require such suppliers to identify the risk of child labor/forced labor and serious safety risks in producing the construction materials. The SPV will review and approve the purchase of primary supplies from the suppliers following such risk identification/assessment and any other relevant due diligence (such as the review of license for quarries). Where appropriate, the contractor will be required to include specific requirements on child labor/forced labor and work safety issues in all purchase orders and contracts with primary suppliers.

13.3 Remedial process

The SPV will ask the primary supplier to take appropriate mitigation measures if cases of non-compliance with the requirements of the country’s regulatory framework or the ESS2 are identified in relation to primary supply workers. Such mitigation measures, which are agreed upon with the primary suppliers, will be monitored periodically to ascertain their effectiveness and final outcomes. Where the mitigation measures are found to be ineffective, the SPV will, within a reasonable period, take appropriate measures to replace the primary suppliers to bring a new supplier that can demonstrate meeting the relevant requirements.



14. CONTRACTOR LABOR MANAGEMENT PLAN (C-LMP)

To ensure effective implementation of the LMP, contractors, in accordance with contract obligations, will prepare separate Contractor Labor Management Plans (C-LMPs) consistent with the LMP. The DHPP will ensure that the C-LMPs (a tentative list of the plans listed below) are duly incorporated into the bidding documents, an adequate budget is earmarked, and the required human resources are made available for the effective implementation of the LMP. The DHPP will also ensure that the preparation of the C-LMPs and their effective implementation throughout the Project implementation until the closing date.

In addition, the DHPP will also make sure that the periodic reporting responsibility of the contractors on the implementation of the C-LMPs as per the Project's ESMP is made a contractual obligation in the contract agreement with the contractors and Owner's Engineers.

List of C-LMPs to be prepared by the contractors

1. Erosion and Sediment Control Plan
2. Muck Disposal Planning and Management Plan
3. Waste Management Plan
4. Hazardous Substances Management Plan
5. Explosive and Blasting Management Plan
6. Emergency Preparedness and Response Plan
7. Water Quality Monitoring Plan
8. Construction Material Sourcing, Extraction, Quarry Management Plan
9. Emissions, Dust and Noise Management Plan
10. Physical Cultural Resources (PCR) Management Plan
11. Vegetation Clearing Plan
12. Landscaping and Re-vegetation Plan
13. Biodiversity Protection Plan
14. ESHS Training for Construction Workers Plan
15. Road Traffic Management Plan
16. Construction Sites Access Management Plan
17. Management of Construction Worker CCFs
18. Occupational Health and Safety Plan
19. Communities Health and Safety Management Plan
20. Site Cleaning and Rehabilitation Management Plan
21. Reservoir First Impoundment Management Plan
22. Biodiversity Conservation Plan (BMP)
23. Labor influx management Plan



24. Security Force Management Plan
25. Cultural Heritage Management Plan
26. Recruitment and Workforce Influx Management Plan



Annex 1: Code of Conduct for Contractor's Personnel

CODE OF CONDUCT FOR CONTRACTOR'S PERSONNEL

We are the Contractor, *[enter name of Contractor]*. We have signed a contract with *[enter name of Employer]* for *[enter description of the Works]*. These Works will be carried out at *[enter the Site and other locations where the Works will be carried out]*. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation, sexual abuse and sexual harassment.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, labourers and other employees at the Works Site or other places

Note to the Bidder:

The minimum content of the Code of Conduct form as set out by the Employer shall not be substantially modified. However, the Bidder may add requirements as appropriate, including to take into account Contract-specific issues/risks.

The Bidder shall initial and submit the Code of Conduct form as part of its bid.

where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as “**Contractor's Personnel**” and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that we require from all Contractor's Personnel.

Our workplace is an environment where unsafe, offensive, abusive or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

REQUIRED CONDUCT

Contractor's Personnel shall:

1. carry out his/her duties competently and diligently;
2. comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person;
3. maintain a safe working environment including by:
 - a. ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health;
 - b. wearing required personal protective equipment;
 - c. using appropriate measures relating to chemical, physical and biological substances and agents; and
 - d. following applicable emergency operating procedures.
4. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health;



5. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
6. not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel;
7. not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another;
8. not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;
9. not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
10. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH);
11. report violations of this Code of Conduct; and
12. not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of the grievance mechanism for Contractor's Personnel or the project's Grievance Redress Mechanism.

RAISING CONCERNS

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact [enter name of the Contractor's Social Expert with relevant experience in handling sexual exploitation, sexual abuse and sexual harassment cases, or if such person is not required under the Contract, another individual designated by the Contractor to handle these matters] in writing at this address [] or by telephone at [] or in person at []; or
 2. Call [] to reach the Contractor's hotline (*if any*) and leave a message.
- - The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by Contractor's Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.



FOR CONTRACTOR'S PERSONNEL:

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact *[enter name of Contractor's contact person(s) with relevant experience]* requesting an explanation.

Name of Contractor's Personnel: [insert name]

Signature: _____

Date: (day month year): _____

Countersignature of authorized representative of the Contractor:

Signature: _____

Date: (day month year): _____



ATTACHMENT 1 TO THE CODE OF CONDUCT FORM:

BEHAVIORS CONSTITUTING SEXUAL EXPLOITATION AND ABUSE (SEA) AND BEHAVIORS CONSTITUTING SEXUAL HARASSMENT (SH)

The following non-exhaustive list is intended to illustrate types of prohibited behaviors.

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

- A Contractor's Personnel tells a member of the community that he/she can get them jobs related to the work site (e.g., cooking and cleaning) in exchange for sex.
- A Contractor's Personnel that is connecting electricity input to households says that he can connect women headed households to the grid in exchange for sex.
- A Contractor's Personnel rapes, or otherwise sexually assaults a member of the community.
- A Contractor's Personnel denies a person access to the Site unless he/she performs a sexual favor.
- A Contractor's Personnel tells a person applying for employment under the Contract that he/she will only hire him/her if he/she has sex with him/her.

(2) Examples of sexual harassment in a work context

- Contractor's Personnel comment on the appearance of another Contractor's Personnel (either positive or negative) and sexual desirability.
- When a Contractor's Personnel complains about comments made by another Contractor's Personnel on his/her appearance, the other Contractor's Personnel comment that he/she is "asking for it" because of how he/she dresses.
- Unwelcome touching of a Contractor's or Employer's Personnel by another Contractor's Personnel.
- A Contractor's Personnel tells another Contractor's Personnel that he/she will get him/her a salary raise, or promotion if he/she sends him/her naked photographs of himself/herself.



Annex 2: Grievance Form

Grievance Form

Grievance registration no.	
Date of registration	

Details of complainant: ☐ (Tick the box for anonymity)

Name:

First Name	Middle name	Last name

Gender:

☐ Male ☐ Female ☐ Others

Address:

Province	District	Municipality	Ward No.	Name of place

Contact details:

Primary mobile no.		Email	
Secondary mobile no.		Facebook	

Preferred mode of contact: _____

Brief description of grievance

--

Mode of submission of grievance:

☐ Verbal ☐ Written ☐ Complaint Box ☐ Phone ☐ Email ☐ Others

Signature of Complainant

Signature of Grievance Officer



Annex 3: Sample Grievance Closure Form

Grievance Closure Form	
Resolution	
Grievance Number	
Grievance registered date	
Description of the steps taken to resolve the grievance	
Description of the resolution	
Department: Mode of communication for reply (meeting/ written/ verbal/ display): Date closed:	
Signatures	
Complainant: Project representative: Date:	



Annex 4: Resolution Notification Form

Resolution Notification Form		
Grievance No:		
Grievance Registration Date:		
Resolution Date:		
GRM Level:		
Resolution		
On behalf of DHPL	On behalf of Complainant	
<i>Prepared by:</i>	<i>Verified by:</i>	<i>Received by:</i>
Name:	Name:	Name:
Date:	Date:	Date:
Signature:	Signature:	Signature:



Annex 5: Incident report/documenting form

Note: this form is to be filled by the designated GBV focal person of the GRM with complete sensitivity and non-biasness towards the survivor and the incident

PART 1

SURVIVOR INFORMATION

1. CASE NUMBER: (assign the Survivor a case number or incident number for confidentiality according to local coding protocols)
2. DATE AND TIME OF THE REPORT:
3. SURVIVOR AGE (DATE OF BIRTH):
4. SEX: FEMALE MALE OTHER (Please specify) RATHER NOT SAY
5. SUMMARY OF INCIDENT: (A brief summary of the incident without disclosing survivor's personal information)

PART 2

INFORMATION ON SERVICE PROVIDERS

Please indicate the organization and the time of the referral from the time the incident was reported. The survivor was referred to the following services.

1. Legal counselling/support
2. Psychosocial counselling
3. Shelter
4. Medical support
5. Police
6. Child helpline/children service providers: Child Helpline: 1098
7. OCMC (One Stop Crisis Management Centre)
8. Other

STATUS OF THE CASE

In coordination with the referred service provider, please provide information on the status of the case and accordingly document it 'CLOSED' in the GRM



Annex 6: Consent for Release of Information

Note: The purpose of this form is to obtain the Survivor's permission to share their information about the incident with other authorized organizations/individuals. The survivor should be informed about the authorized organization/individuals (WB, project Manager, Service providers) to whom the information will be disclosed

I, _____, give my permission for (Name of Organization) to share information about the incident I have reported.

I understand that in giving my authorization, I am giving (Name of Organization) permission to share the specific case information from my incident report with the PIC of the project/World Bank/Service Providers, so that I can receive the best possible care and assistance with safety and as per my need. I understand that the information will be treated with confidentiality and respect and shared only as needed to provide the assistance I need and request. I understand that releasing this information means that a person from the referred service provider may come to talk to me.

Signature or thumb print of the survivor:

Signature or thumb print of the parent/guardian (if survivor is under 18):

