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NATIONAL HIGHWAY AUTHORITY, PAKISTAN

**Labor Management Plan
(LMP)**

WIDENING & IMPROVEMENT OF PRIORITY SECTIONS OF N-5 (487 KM)



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EXECUTIVE SUMMARY

ES-1 INTRODUCTION

The Government of Pakistan (GoP) has joined hands with the Asian Infrastructure Investment Bank (AIIB) under programmatic engagement through National Highway Authority (NHA) for Widening & Improvement of Priority Sections of National Highway (N-5) – herein after called the Project. NHA as the Implementing Agency (IA) has prepared this Labor Management Plan (LMP) to discuss the requirements regarding labor and working conditions applicable to the Project. It aims to guide the management and execution of activities that may induce labor related risks during the implementation of the Project. The LMP outlines requirements that must be met by all employees of the IA as well as all its consultants, contractors, subcontractors, labor supply contracting agencies, third parties, and other staff involved in the Project's execution.

National Highway N-5 having total length of 1,819 km is the lifeline for the Pakistan economy. The N-5's importance lies in it linking the port of Karachi to Peshawar and the Afghan border, via all of the country's main population and economic centres of Hyderabad, Multan, Lahore, Gujranwala, Rawalpindi / Islamabad and via the Karakorum Highway up to the international border of Peoples Republic of China (PRC). In the 2022 flood events, numerous segments of the N-5 highway experienced significant impacts, resulting in roadway erosion and collapse and traffic interruptions.

The proposed Project is divided into eight Sections (Table ES.1)

Table 0.1: Proposed Project Sections

Section No.	Name	Length (km)
1	Hyderabad – Hala (Phase 2)	65
2	Ranipur – Rohri (Phase 1B)	70
3	Okara – Manga (Phase 2)	83
4	Lahore – Gujranwala (Phase 1B)	68
5	Kharian – Dina (Phase 2)	41
6	Dina – Rawat (Phase 2)	72
7	Rawalpindi – Burhan (Phase 1A)	44
8	Nowshera – Peshawar (Phase 1A)	31
TOTAL		474

The project is overall divided into two (02) phases. Phase 1 is further divided into Phase 1-A and Phase 1-B. Phase 1-A includes Section # 07, Section # 08 and Section # 02 while Phase 1-B includes Section # 04 alongside the Nai Baran Bridge located southwest of Hyderabad in Sindh province. The Phase 2 project includes all of the remaining Sections. This phasing is conducted to prioritize the most urgent projects based on the economic and financial plan of AIIB, road and traffic conditions and environment, social and resettlement impacts. The framework level Environmental and Social (E&S) instruments will be prepared for all the Sections under the Project including Resettlement Planning Framework (RPF), LMP, Gender Action Planning Framework (GAPF) and Stakeholder Engagement Plan (SEP) while site-specific documents including Environmental and Social Impact Assessment

(ESIA)/Environmental and Social Management Plan (ESMP) and Resettlement Action Plan (RAP) including Livelihood Restoration Plan (LRP) will be prepared for Phase 1(A) on a priority basis. The specific risks, impacts and mitigation mechanisms regarding labor commissioned for the Project, will be discussed in this report.

The implementation of the Project will involve different categories of workers for different activities. Project workers are divided into the following two categories, as per the AIIB Environment and Social Framework (ESF) 2016 (as amended 2024). Project workers include: (a) persons engaged directly by the Client (whether full-time, part-time, temporary, seasonal or migrant worker¹), to work specifically on the Project; and (b) personnel of contractors engaged by the Client to work on the Project and of subcontractors hired by these contractors to work on the Project.

ES-2 OVERVIEW OF LABOR LEGISLATION

There are numerous labor regulations in Pakistan. These labor laws apply to a wide range of industrial, commercial, and labor institutions, and they include a number of ordinances, acts, rules and regulations, and other statutes. The following is a list of the most important legislation pertaining to welfare and labor rights.

- Federal
 - Factories Act, 1934
 - Industrial Relation Act
 - Workman Compensation Act, 1923
 - Minimum Wages Ordinance, 1961
 - Payment of Wages Act, 1936
 - Industrial & Commercial Employment Standing Orders Ordinance, 1968
 - Maternity Benefits Ordinance, 1958
 - Apprenticeship Ordinance, 1962
 - Employees Old Age Benefit Act, 1976
 - Employments of Children Act, 1991
 - Bonded Labor Abolition Act, 1992
 - Workers Welfare Act, 1971
 - Minimum Wages (unskilled workers), Amendment 2015
 - The Disabled Persons (Employment and Rehabilitation) Act, 2015
 - The Protection Against Harassment of Women at the Workplace Act, 2010
 - Transgender Act, 2018
- Sindh
 - Pakistan Labor Policy, 2010
 - The Sindh Workers Compensation Act, 2015
 - The Sindh Minimum Wages Act, 2015
 - The Sindh Terms of Employment (Standing Orders) Act, 2015
 - The Sindh Payment of Wages Act, 2015
 - Sindh Bonded Labor (Abolition) Act, 2015
 - Sindh Factories Act, 2015

¹ 'Migrant workers' are workers who have migrated from one country to another or from one part of the country to another for purposes of employment.

- The Sindh Prohibition of Employment of Children Act, 2017
- Sindh Occupational Health and Safety Act, 2017
- Protection against Harassment of Women at the Workplace Act, (Amendment) 2022
- Sindh Prohibition of Child Employment Act, 2017
- Sindh Differently Abled Persons (Employment, Rehabilitation and Welfare) Act, 2017
- Sindh Labor Policy, 2018
- The Sindh Employees' Social Security Act, 2016
- Punjab
 - The Punjab Workmen's Compensation (Amendment) Act, 2013
 - Factories Act, 1934
 - Punjab Minimum Wages Act, 2019
 - Punjab Employees' Social Security Ordinance, 1965
 - Punjab Workers Welfare Fund Act, 2019
 - Punjab Occupational Health and Safety Act, 2019
 - Punjab Domestic Workers Act, 2019
 - Punjab Restriction on Employment of Children Act, 2016
 - Punjab Protection of Women against Violence Act, 2016
 - Punjab Maternity Benefit Ordinance, 1958
- Khyber Pakhtunkhwa
 - Khyber Pakhtunkhwa Workers' Compensation Act, 2013
 - Khyber Pakhtunkhwa Factories Act, 2013
 - Khyber Pakhtunkhwa Minimum Wages Act, 2013
 - Khyber Pakhtunkhwa Workers Welfare Fund Act, 2013
 - Khyber Pakhtunkhwa Employees' Social Security Ordinance, 1965
 - The Khyber Pakhtunkhwa Prohibition of Employment of Children Act, 2015
 - Khyber Pakhtunkhwa Commission on the Status of Women Act, 2016
 - Protection Against Harassment of Women at the Workplace Act, 2020
 - Khyber Pakhtunkhwa Child Protection and Welfare Act, 2010
 - Khyber Pakhtunkhwa Prohibition of Employment of Children Act, 2015

NHA and its contractors are bound to abide by the terms and conditions of the above national and sub-national level Acts. The most relevant legislation includes the Pakistan Occupational Health & Safety Act 2018, Punjab Occupational Health and Safety Act, 2019, Sindh Occupational Safety and Health Act, 2017 (Amended 2019) and Khyber Pakhtunkhwa Occupational Safety and Health Act, 2022.

The GoP has also ratified 36 International Labor Organization (ILO) Conventions, including eight fundamental conventions. In the South Asia region, Pakistan is the second country that has ratified all eight fundamental conventions as enshrined in the ILO Declaration on Fundamental Principles and Rights at Work. The ILO works in close collaboration with its tripartite constituents towards achieving Pakistan's decent work objectives. The ILO Migrant Workers (Supplementary Provisions) Convention and the United Nations (UN) International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families will also be considered. Moreover, the World Bank Group (WBG) has guidelines for Environment, Health, & Safety (EHS) that serve as useful references for occupational health

and safety (OHS), community health and safety as well as on construction and decommissioning.

ES-3 POLICIES AND PROCEDURES

The Project will also follow the stipulations of the AIIB ESF. In summary, AIIB recognizes the important role played by workers and their representatives in the development process and their contribution to sustainable economic growth. It believes that the following measures contribute to the quality of the Project:

- Providing workers with living wages, safe and healthy working conditions and putting measures in place to prevent accidents, injuries and disease;
- Avoiding activities involving forced labor and harmful or exploitative forms of child labor; having good human resources management; and
- Having a sound labor management relationship based on equal opportunity, fair treatment, nondiscrimination, freedom of association, right to collective bargaining and access to grievance mechanisms, consistent with the national law (including international agreements adopted by the member) governing the Project.

All project staff and contractors must be informed of the Project management policies and processes. Contracts must be drafted in conformity with Environmental and Social Standard (ESS) 1 of AIIB's ESF and Local Labor Laws, and all recruitment processes must be transparent and impartial. All signs and procedures prepared must be in English, Pashto, Punjabi, Sindhi and Urdu languages to the greatest extent practicable.

As part of the conformance to labor laws and procedures, the Project team will draft the following procedures for implementation before the start of construction work:

- Reporting and Investigation of Incidents /Illnesses
- Procedure for Waste Management
- Procedure for Housekeeping
- Procedure for Hazard Identification and Risk Assessment
- Training Procedure including Induction training
- Toolbox Talks
- Safe Systems of Work – work at heights, hot work, electrical High Tension/Low Tension (HT/LT) works, use/operate heavy machinery and equipment, Excavation, Confined Spaces (Permits to Work)
- Personal Protective Equipment
- Emergency Response Procedure (especially for flood, earthquake, fire and other major emergencies)
- Monthly Reporting Procedure
- Camp Management Procedure
- Management of Food and Drinking Water at Campsite(s) and at construction site
- Project Site Security Procedure
- Internal Auditing Procedure

- Procedures for Management of Visits by AIIB and Government Agencies
- Procedures for Storage of Fuel, Hazardous substances and Other Materials
- Operation and Maintenance of Heavy Equipment and Overhead Cranes
- Child and Forced Labor Avoidance Procedures
- Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) & Gender Based Violence (GBV) Prevention Procedures.
- Procedures specifically for Migrant Workers
- Recruitment Procedures that are transparent, public, and non-discriminatory, and open with respect to ethnicity, religion, sexuality, disability, or gender.

ES-4 ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The main labor risks associated with the Project are assessed to be:

- OHS including poor work safety culture, accidents/incidents and lack of Personal Protective Equipment (PPE) provision
- Child and Forced Labor,
- Labor influx,
- Labor disputes over terms and conditions of employment,
- SEA/ SH, Child Abuse (CA), GBV,
- Risk from communicable disease, like Human Immunodeficiency Viruses (HIV)/ Acquired Immunodeficiency Syndrome (AIDs),
- Risk from unsafe potable water,
- Lack of provision of basic facilities – including, water, food, toilets, washing hand facilities and medical aid.
- Unfair recruitment and selection practices which could discriminate against women and/or vulnerable groups,
- Salary, wages, and benefits that do not comply with labor laws,
- Sub-standard campsite facilities and campsite management,
- Lack of unified rules and regulations for all workers,
- Lack of proper grievance redress channel for workers;
- Disputes over unfair/early termination,
- Disputes over worker organizations.

The activities involved in construction and operation work of the Project will be primarily responsible for the above risks that could affect workforce, including the Project Implementation Unit (PIU), Regional Implementation Units (RIUs), consultants, and construction workers.

OHS is expected to be a major aspect in the Project and typical OHS risks include being exposed to the physical dangers of using construction equipment, working near moving traffic, operating cranes, and hoisting equipment, working on or near scaffolding, tripping, and falling, handling bitumen, burns, being exposed to noise and dust, falling objects, traffic risks from operating project-related vehicles, exposure to hazardous materials, and exposure to electrical risks from using tools and machinery.

To ensure a safe and healthy workplace, the PIU and RIUs along with its consultants and contractors will take reasonable care to identify all foreseeable OHS hazards. The project and all associated workers will follow OHS regulations. All contractors must include a comprehensive description of their OHS management strategy with their bids. One of the factors the PIU and RIUs will consider when choosing the contractors is the applicability of these safety provisions and their previous track record in doing so. All contractors must make sure that workers wear PPE, get safety training, and take other preventative measures as specified in the AIIB ESF 2016 (amended 2024). Both the company and the employees are accountable for safety, where they must work together to create and implement an OHS program as well as safe work practices and procedures.

ES-5 RESPONSIBLE STAFF

NHA / PIU Responsibility: The PIU-Headquarter (HQ) of NHA oversees the overall management of the Project and the LMP's implementation. The LMP must be followed throughout the procurement process. Consultant(s), contractor(s) and subcontractor(s) must be hired transparently based on their experience and competency. The E&S Cell of PIU-HQ will also closely coordinate with Environment, Afforestation and Land Section (EALS), NHA in all matters including but not limited to the induction, trainings, documentation and implementation of this LMP.

RIUs Responsibility: The RIU of each project Section oversees the onsite management of the Project and the LMP's implementation at the concerned Section. The LMP must be followed throughout the procurement process. Consultant(s), contractor(s) and subcontractor(s) must be hired transparently based on their experience and competency. The E&S Staff of the RIU(s) will also closely coordinate with the PIU-HQ in all matters including but not limited to the induction, trainings, documentation and implementation of this LMP.

Implementation and Supervision Consultant's Responsibilities: Implementation and supervision consultants will review contractors' monitoring report of LMP implementation and submit it to RIU. Consultant will provide induction and regular training to workers on environmental, social and OHS issues, taking part in the settlement of labor disputes together with the competent agencies, organizations and personnel, ensure the Projects' LMP is monitored and reviewed regularly and ensure that all the employees, contractors, subcontractors have access to the most recent LMP at all times in a language understood by them.

Third Party Validation (TPV) Consultants: The TPV will be carried out through independent E&S Specialists or consultants. TPV consultants will conduct the external and independent monitoring of the implementation of this LMP.

Contractors' Responsibilities: To ensure that all LMP requirements are met, the contractor(s) must appoint Labor and OHS representative(s). The contractor must provide the RIU with a monthly report on all incidents through the supervision consultants. The contractor is responsible for teaching/training employees how to use PPE and safety precautions. Contractors must keep records in accordance with the procedures outlined in this LMP. RIU may request records at any time to ensure that labor laws are followed. The RIU will compare records to actuals at least once a month and, if necessary, may order immediate corrective

action. The Project staff will continue to have access to the NHA's current grievance procedures. Contractors will be required to set up a grievance redress system for employees that meets the LMP's minimum requirements. Every month, the RIU's social development specialist will go over all records. Each contractor's vehicle must be manned at all times by the Labor and OHS representative(s). The contractor must provide any necessary instructions. The contractor's employees will be directed by the Labor and OHS representative(s).

ES-6 AGE OF EMPLOYMENT

According to the AIIB's ESF and the Local Prohibition of Employment of Children Acts, no one under the age of 18 may be hired to work at the Project site(s), unless certain high standards are met, and rigorous monitoring and reporting can take place. Given the difficulty of meeting these high standards in the Project context, no worker under the age of 18 will be engaged for any tasks under this Project. The hiring process must specify how candidates' original Computerized National Identity Cards (CNICs) will be checked, so that no one under the age of 18 can be hired on site.

ES-7 TERMS AND CONDITIONS OF EMPLOYMENT

NHA is committed to providing equal opportunities for all its employees and potential employees where everyone is treated with respect and dignity and where there is equal opportunity for all. The employment terms and conditions applying to project employees as set out in the labor rules will apply to all project employees who are assigned to work on the Project (direct workers). Terms and conditions of part-time direct workers are determined by their individual contracts.

The normal hours of work of project workers shall not exceed more than 8 hours a day for 5 days a week, or a 40-hour work week, exclusive of time for meals. Every project worker is entitled to a 2-day rest day period during weekends (Saturday and Sunday). Workers shall also be entitled to a rest day on regular holidays recognized by the province. Under the Maternity and Benefits Ordinance 1958, leave is granted to pregnant women for a period of 12 weeks with full pay. It is unlawful for an employer to dismiss a woman worker on maternity leave.

Provincial governments constitute Minimum Wages Boards under Section (3) of the Minimum Wages Ordinance, 1961 to decide the wage rates which are revised annually. The workers' welfare legislation includes Employees Old Age Benefits 1976 (with provisions for old age pension, old age grant, invalidity, and widow(er) pension). For contract termination, a notice of one month must be served before severing the employment relationship or payment of one month's wages in lieu of notice may be provided. The law also obliges the employer to provide the termination certificate in writing stating the reason behind it. Any injury, illness or accident sustained by the worker during the work period shall be conveyed to the nearest clinic or hospital by the hiring authority or its representative.

AIIB ESS1 requirements also ensure a sound labor management relationship based on equal opportunity, fair treatment, nondiscrimination, freedom of association, right to collective

bargaining and access to a workplace grievance redress mechanism, consistent with national law governing the Project.

ES-8 WORKERS' GRIEVANCE REDRESS MECHANISM

For the Project, the PIU-HQ NHA, supervision consultants and its contractors will establish a separate Grievance Redress Mechanism (GRM) for the Project workers to address labor or workplace related concerns consistent with the applicable national and provincial laws and AIIB's ESF requirements before the Project Effectiveness. Anonymous reporting mechanisms will be established to ensure the confidentiality requirements of the complainant(s). Detailed worker GRM is provided in SEP of this Project.

The PIU-HQ and RIU(s) will make sure that the contractors are trustworthy and legal businesses with established labor management practices that adhere to this LMP. A clause requiring contractors to abide by current OHS, labor, and worker protection laws and AIIB's ESF will be included in all contracts with them, PIU-HQ and RIU will stay updated on how contractors perform in regard to their employees, paying particular attention to how well they adhere to their written contracts.

ES-9 TRAINING, MONITORING AND REPORTING

Training for workers shall include health promotion, hazards associated with their work, health risks involved or to which they are exposed to, preventive measures to eliminate or minimize risks, steps to be taken in case of emergency, and safety instructions for the jobs, activities and tasks to be handled by workers; SEA/SH&GBV risks, policies, code of conduct etc.

As part of the ESMP or related management plans, a monitoring and reporting system is required for grievances lodged, disciplinary cases, pay slip queries, lost hours due to site working action, camp committee issues raised, food or lodging complaints and training and capacity building. The monitoring and reporting is the mandatory requirement as RIU, supervision consultant and contractor of the Project will have to monitor the implementation progress and report back to the AIIB.

LIST OF ABBREVIATIONS

AIDs	Acquired Immunodeficiency Syndrome
AIIB	Asian Infrastructure Investment Bank
BMPs	Best Management Practices
CA	Child Abuse
CBA	Collective Bargaining Agent
CNICs	Computerized National Identity Cards
CoC	Code of Conduct
COVID	Corona Virus Disease
CPLC	Citizens-Police Liaison Committee
CTD	Counter Terrorism Department
DSC	Design and Supervision Consultants
EALS	Environment, Afforestation and Land Section
E&S	Environmental and Social
ECA	Employment of Child Act
EHS	Environment, Health, & Safety
EOAB	Employees Old Age Benefits
EPA	Environment Protection Agency
EPC	Engineering, Procurement and Construction
ERP	Emergency Response Plan
ESF	Environment and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management
ESMPF	Environmental and Social Management Planning Framework
ESS	Environmental and Social Standard
GAPF	Gender Action Planning Framework
GBV	Gender Based Violence
GoP	Government of Pakistan
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HIV	Human Immunodeficiency Viruses
HQ	Headquarter
HSE	Health, Safety and Environment
HT	High Tension
IA	Implementing Agency
IEC	Information, Education and Communication
IFIs	International Financial Institutions
IGC	International General Certificate
ILO	International Labor Organization
IRA	Industrial Relation Act
LMP	Labor Management Plan
LOTO	Lock Out Tag Out
LRP	Livelihood Restoration Plan
LT	Low Tension
MSDS	Material Safety Data Sheets
NEBOSH	National Examination Board in Occupational Safety and Health
NFPA	National Fire Protection Association
NHA	National Highway Authority
OHS	Occupational Health and Safety
PEHL	Pakistan Emergency Helpline
PIU	Project Implementation Unit

PPD	Permanent Partial Disability
PPE	Personal Protective Equipment
PRC	Peoples Republic of China
PTD	Permanent Total Disability
PTW	Permit to Work
RAP	Resettlement Action Plan
RCA	Root Cause Analysis
RIUs	Regional Implementation Units
RPF	Resettlement Planning Framework
SC	Supervision Consultant
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SOPs	Standard Operating Procedures
TBTs	Tool Box Talks
TPV	Third Party Validation
TTD	Temporary Total Disability
UN	United Nations
WBG	World Bank Group

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1 INTRODUCTION

The GoP has joined hands with the AIIB under programmatic engagement through NHA for Widening & Improvement of Priority Sections of National Highway (N-5) – herein after called the Project. NHA as the IA has prepared this LMP to discuss the requirements regarding labor and working conditions applicable to the Project. It aims to guide the management and execution of activities that may induce labor related risks during the implementation of the Project. The LMP is a requirement that must be met by all employees of the IA, as well as all of its consultants, contractors, subcontractors, labor supply contracting agencies, third parties, and other staff involved in the Project's execution.

1.1 LMP OBJECTIVES

The objectives of this LMP are to:

- To promote the fair treatment, non-discrimination, and equal opportunity of workers.
- To establish, maintain, and improve the worker-management relationship.
- To promote compliance with national and international employment and labor laws.
- To protect workers, including vulnerable categories of workers such as women, people with disabilities, children, migrant workers, workers engaged by third parties and workers in the client's supply chain.
- To promote safe and healthy working conditions, and the health of workers.
- To prevent and address any form of GBV, SEA/SH, bullying, intimidation, and/or exploitation in the workplace.
- To avoid the use of child and forced labor.
- Encourage just and equitable labor practices to ensure equal opportunity, non-discrimination, and fair treatment for both male and female employees;
- Give project participants and workers easy access to ways to voice their complaints about the workplace.

The LMP's description of the key labor requirements and risks associated with the Project would help NHA determine the resources needed to resolve labor difficulties. The LMP is a dynamic document that is initiated early in the planning stage of the Project and is evaluated and updated as the Project is developed and carried out. As a result, this document defines the types of personnel and their management that the Project is expected to use.

NHA has prepared this document, and its annexes, based on the existing labor laws in Pakistan and its ratified international agreements, and in accordance with the guidelines of the ESS1 of the AIIB. Furthermore, the scope and procedures of the LMP, and its annexes, constitute a special labor framework, against which compliance is mandatory for NHA and its consultants, contractors, subcontractors, and suppliers associated with this project. The LMP will be applicable to all types of workers that will be employed by NHA and all personnel employed by the NHA in relation to the execution of the Project; and therefore, its use and knowledge is mandatory.

Important LMP components will be included in the contractual obligations of contractors and subcontractors. All contractors and subcontractors shall prepare and implement specific labor management plans based on their specific labor volumes and requirements in line with this LMP.

1.2 SCOPE OF THE LMP APPLICATION

The LMP is required by the AIIB's ESF 2016 (as amended 2024) and its ESS1 on Environmental and Social Assessment and Management. Its scope encompasses:

- Labor and contracts;
- Management of workers;
- Occupational Health and Safety; and
- Access of information and grievance mechanisms.

The main objective of ESS1 is to achieve the environmental and social soundness and sustainability of Projects and to support the integration of environmental, social, health and safety considerations into the Project decision-making process and implementation. This will include promoting constructive worker-management engagement and providing benefits for project development by treating project personnel fairly and giving them safe and healthy working circumstances. The goal of this LMP is to make project planning and execution easier by identifying the major personnel requirements and the E&S actions needed to manage labor-related project challenges. Along with fundamental guidelines that apply to all forms of work, the LMP also addresses problems and issues unique to the Project. The LMP is applicable to all workers employed by the Project as specified in ESS1.

- Direct Workers: People employed or engaged directly by the NHA to work specifically in relation to the Project;
- Contracted Workers: People employed or engaged through third parties to perform work related to core functions of the Project, regardless of location;
- Migrant Workers: People employed or engaged by the NHA and its contractors from other part of the country or abroad.

1.3 PROJECT OVERVIEW

National Highway N-5 having total length of 1,819 km is the lifeline for the Pakistan economy. The N-5's importance lies in it linking the port of Karachi to Peshawar and the Afghan border, via all the country's main population and economic centres of Hyderabad, Multan, Lahore, Gujranwala, Rawalpindi / Islamabad and via the Karakorum Highway up to international border of Peoples Republic of China. In the 2022 flood events, numerous segments of the N-5 highway experienced significant impacts, resulting in roadway erosion and collapse and traffic interruptions. The Project involves the detailed design for improvement and widening of N-5 which is divided in following two zones i.e., South Zone (135 km) and North Zone (339 km). These two zones are further divided into eight (08) Sections which are as provided in Table 1.1.

Table 1.1: Proposed Project Sections

Section No.	Name	Length (km)
1	Hyderabad – Hala (Phase 2)	65
2	Ranipur – Rohri (Phase 1B)	70
3	Okara – Manga (Phase 2)	83
4	Lahore – Gujranwala (Phase 1B)	68
5	Kharian – Dina (Phase 2)	41
6	Dina – Rawat (Phase 2)	72
7	Rawalpindi – Burhan (Phase 1A)	44
8	Nowshera – Peshawar (Phase 1A)	31
TOTAL		474

The project is overall divided into two (02) phases. Phase 1 which is further divided into Phase 1-A and Phase 1-B projects. Phase 1-A includes Section # 02, Section # 07 and Section # 08 while Phase 1-B includes Section # 04 alongside the reconstruction of the Nai Baran Bridge located southwest of Hyderabad in Sindh province.

The Phase-2 project includes all the remaining Sections. This phasing is conducted to prioritize the most urgent projects based on the economic & financial plan of AIIB, traffic and road conditions, and environment, social and resettlement impacts. The framework level E&S instruments will be prepared for all the Sections under the Project (RPF, LMP, GAP and SEP) while site-specific documents (ESIA/ESMP and RAP including LRP) will be prepared for Phase 1(A) on a priority basis.

The scope of work includes:

- Conversion of 4-lane dual carriageway into 6-lane dual carriageway with addition of concrete lanes dedicated for heavy traffic,
- Construction of 7.3 m wide service road in urban areas,
- Upgradation of existing road corridor into climate resilient infrastructure through additional cross drainage structures,
- Widening and improvement of existing bridge structures,
- Rehabilitation of existing deteriorated road sections,
- Highway safety works through geometric improvements, installation of road safety devices, pedestrian crossings, dedicated U-Turns, etc.

The objectives of the Project are to:

- Ensure that the N-5 provides a safe, sustainable and disaster resilient road corridor,
- Provide dedicated heavy traffic lane to minimize the road deterioration,
- Ensure provision of a service lane in urban areas to manage the local traffic and reduce their direct accessibility on main carriageway,
- Enhance road safety through Star Rating improvements up to 3 Star or better.

1.4 OVERVIEW OF LABOR USE ON THE PROJECT

This LMP applies to all Project workers including (whether full-time, part-time, temporary, seasonal or migrant), : (a) persons engaged directly by the NHA to work specifically on the

Project; and (b) personnel of contractors engaged by the NHA to work on the Project and of subcontractors hired by these contractors to work on the Project ..

The Project will involve PIU-HQ and RIU staff; contracted workers engaged in construction work and consultancy services for the Project (during project preparation and implementation); and migrant workers (who have migrated from one country to another or from one part of the country to another for purposes of employment).

1.5 LABOR REQUIREMENT

Workers are divided into different categories: direct workers, contracted workers and migrant workers;

a) Direct workers²: Direct employees of the Project are individuals who are hired by the NHA to perform work that is explicitly related to the Project. For the purpose of carrying out a variety of project operations, direct workers will include those temporarily hired for the Project staff and the permanent staff of the PIU-HQ and RIUs. As part of the PIU-HQ and RIU, N-5 may additionally hire consultants and support personnel who will be paid on a contract basis. This may also include consultants, both short and long term, recruited for the Project by NHA. The national and provincial labor regulations, and AIB's ESF, will serve as the basis for these consultants' terms and conditions. The NHA may employ consultants to carry out as many short-term tasks as are required. Any civil officials who are seconded to assist with project implementation must adhere to the all criteria, including the OHS criteria, as outlined in this LMP. The PIU-HQ and RIU will be tasked with:

- General project responsibilities for project management, financial management, procurement, monitoring and evaluation, road safety and environmental, social, climate change, land and resettlement aspects management.
- Technical responsibilities to help personnel working on the Project; and
- Support services (office manager, assistants, driver, others).

b) Contracted Workers: For the purpose of carrying out document preparation and carrying out various civil works under the Project, NHA will hire a number of contractors and consultants. Contractors, subcontractors, and their employees who are employed by NHA may include consultants who are preparing the feasibility studies and detail design for the Project as well as consultants for environmental, social and Climate Change assessment studies. Both expert and unskilled labor will be employed by civil work contractors. Below is a description of the various categories of project contracted employees:

- i. Permanent / Skilled staff of Contractors (construction company):** Project managers, site engineers, construction foremen, supervisors, environmental,

² A "direct worker" is a worker with whom the project has a directly contracted employment relationship and specific control over the work, working conditions, and treatment of the project worker. Where government civil servants are working in connection with the project, whether full-time or part-time, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project.

social, labour and OHS representative(s), as well as administrative and financial officers for the Project/subprojects will all be involved in the N-5.

- ii. **Skilled workers engaged by Sub-contractors:** Contractors will mobilize their relevant workers and subcontractors to meet project needs based on the expertise needed for each type of project operations. Traffic controllers (flaggers), concrete workers, drainage and utility workers, steel workers, electricians, technicians, drivers, and operators of heavy machinery are just a few examples of the specialized workers. It would be expected of the staff to possess knowledge pertinent to the needed tasks.
- iii. **Unskilled Community Members engaged by the contractor/subcontractors:** To reduce the number of migrant workers at construction sites, local labor will be hired to the extent possible as unskilled and skilled workers, particularly for simple tasks like building ancillary structures, levelling, and excavating land, loading and unloading materials, supporting construction workers, cleaning up construction sites, watering work sites, and watchmen. The contractor will be legally obligated to engage with NHA /PIU-HQ to prioritize the impacted communities and vulnerable groups, including female workers and labors with disabilities at their request, in order to ensure equal chances in employment.
- iv. **Project Management and Supervision Support:** Design and Supervision Consultants (DSC) with the necessary experience will be hired by NHA to perform the following tasks: supporting the PIU-HQ and RIU in the selection of the contractor(s), developing designs, project management, construction supervision, and contract management. Additionally, DSC will help PIU-HQ and RIU monitor the contractor(s)' environmental and social performance as outlined in their environmental and social management plans, as well as their adherence to workplace health and safety regulations.
- v. **Third Party Validation Consultants:** PIU-HQ may hire TPV consultants. TPV experts are in charge of ensuring adherence to approved project-related plans and programmes, including the environmental social and climate change concerns. The TPV consultants may be hired at the start of the implementation phase, and they will finish their job between six months and a year after all project activities have been successfully finished.
- vi. **Migrant Workers:** Worker who have migrated from one country to another or from one part of the country to another for purposes of employment. There are number of works which involves skilled and semi-skilled migrant worker to perform specific duties that might require special expertise that cannot be sourced locally. These workers may be employed for temporary basis not only from out of country, but also workers moving from other part of country as needed.

It will be ensured (and monitored periodically by NHA) that direct workers, contracted workers and migrant workers include no child and forced labor.

1.6 NUMBER OF PROJECT WORKERS

Direct Workers: Currently, N-5 has approximately 08 direct workers, where this number is expected to increase over time. The staff of the PIU-HQ comprises of the General Manager (Engineer) NHA-HQ as project In-charge, and several senior and junior experts in road safety, Procurement, Financial management, Design, Land, Resettlement, Environment, Social and Climate Change. Direct workers carry out key functions such as project management, coordination, fiduciary, environmental and social management, Climate Change assessment, monitoring and evaluation, and reporting. All of these positions are already filled out in the PIU-HQ by existing staff of NHA. Moreover, additional resource will be included at the later stages of planning and implementation phases. The actual numbers of direct workers will be finalized during the detailed design stage for each Section.

Contracted Workers: The number of contracted workers who will work on the Project will be estimated during the detailed design stage for each Section.

Migrant Workers: The overall numbers of the migrant workers will be very low considering the specific duties that might require special expertise that cannot be sourced locally. However, the actual number of migrant workers who will work on the Project will be estimated during the detailed design stage for each Section.

1.7 WORKFORCE CHARACTERISTICS

The number of project workers required for the eight Sections falling under the Project shall be identified by the Project design team in line with PIU-HQ of NHA. However, given the nature of the Project workforce (mostly semiskilled construction labor) and characteristics of the labor force in project area, it is likely the workforce, especially the lower-skilled workers, will be mostly male.

There will, however, be females also available in the Project areas to contribute to the Project. The expectation is that the majority of labor will be locally hired with the exception of a few skilled workers. Provisions will be made to train and hire as many as possible from local communities where the activities are taking place, with a particular focus on vulnerable groups. The number of women and those from vulnerable groups recruited to work on the Project will be documented and reported. Furthermore, professional business/capacity building companies involving skilled workers/experts might be contracted in order to carry out surveys, trainings, and other assessments within the Project.

1.8 TIMING OF LABOR REQUIREMENTS

Direct Workers: The direct personnel will typically be needed full-time and all year long when the Project is being implemented. The year-round construction period can be a little longer or a little shorter depending on the weather. Throughout the course of the Project, additional experts and consultants will be retained as needed. However, it is apparent that they will be employed in accordance with the implementation of various sub-components for specified time slots. The timing for the engagement of such workers will be revealed at a later point.

Contracted Worker: The PIU-HQ will hire consultants and contractors who will hire people based on their degree of ability and Sections requirements based on the scope of work included in N-5. When the construction contracts are granted and the contractors produce their work plans, the specifics of the timing of the number of labor requirements, frequency, types of jobs, and length of the requirement will be decided. This LMP may need to be changed at that moment. The maximum number of hours worked per day should be 9, with at least one hour allotted for rest.

2 OVERVIEW OF LABOR LEGISLATION

This chapter presents an overview of the labor legislation in the country relevant to the N-5 project, along with relevant AIIB requirements related to workers and working conditions.

2.1 OVERVIEW

There are a number of labor laws in Pakistan, where most of the labor legislations are based on the inherited legal framework of Britain. Many of the legislations were derived from colonial acts and amendments, which were enacted from 1850 to 1947 and still exist as a part of the country's labor legislation which has been enacted either at the Federal or Provincial level. These labor laws are broad and contain several ordinances, acts, rules and regulations and other statutes relating to industrial, commercial, and labor establishments. These laws compliment the smooth running of the business with regard to matters relating to employers and employees in order to achieve the target of higher productivity, reasonable profits, better wages and reduction in unjust practices or discrimination. Many of these laws pertain to the implementation of the international labor conventions that Pakistan has ratified.

2.2 LABOR RIGHTS IN THE CONSTITUTION OF PAKISTAN (1973)

The Constitution of Pakistan 1973 provides a framework of rights for labor force and contains provisions for the economic and social well-being of the people and for the promotion of social justice. The Constitution of Pakistan contains a range of provisions with regards to labor rights found in Part II: Fundamental Rights and Principles of Policy. Fundamental rights, such as security of livelihood, prohibition of bonded labor, eradication of slavery, and the right of association have been incorporated in the constitution in Part II. Thus, the constitution affirms the progress of labor legislation, which is conducive to change and to benefit the working class in the following articles:

- Article 11 of the constitution prohibits all forms of slavery, forced labor, and child labor
- Article 17 provides for a fundamental right to exercise the freedom of association and the right to form unions
- Article 18 proscribes the right of its citizens to enter upon any lawful profession or occupation and to conduct any lawful trade or business
- Article 25 lays down the right to equality before the law and prohibition of discrimination on the grounds of sex alone
- Article 37(e) makes provision for securing just and humane conditions of work, ensuring that children and women are not employed in vocations unsuitable for their age or sex, and for maternity benefits for women in employment

2.3 INTERNATIONAL LABOR STANDARDS APPLICABLE IN PAKISTAN

Pakistan has various obligations under international law pertaining to labor rights. It is a signatory to the Universal Declaration of Human Rights 1948 which provides the right to work; to free choice of employment in just and favorable conditions of work, and to protect against unemployment. It also includes the right to equal pay for equal work; the right to just and

favorable remuneration ensuring an existence worthy of human dignity; and the right to form and join trade unions.

The International Covenant on Economic, Social and Cultural Rights 1966 under Articles 6-8 further articulates these rights by placing obligations on the State to protect the right to work as well as working towards fully realizing the right through provision of fair wages with equal pay for equal work which is sufficient to provide a decent living for themselves and their family; the requirement for safe and healthy working conditions; equal opportunity for promotions; rest, leisure, holidays, limited working hours, etc. It also recognizes the right to join and form trade unions and all acts ancillary to it. The International Covenant on Civil and Political Rights 1966 protects civil rights and the right to join trade unions. All of the above, along with Convention for the Elimination of all Forms of Discrimination Against Women 1979, protect against discrimination, including specific mention of discrimination on the basis of sex. Pakistan is also a signatory to the 1998 Declaration of Fundamental Rights at Work which reaffirms the constitutional principle of the elimination of discrimination in respect of employment and the Protection Against Harassment of Women at the Workplace Act, 2010.

2.4 INTERNATIONAL LABOR ORGANIZATION (ILO) LABOR CONVENTIONS – RATIFICATIONS FROM PAKISTAN

The government of Pakistan has ratified 36 ILO Conventions, including eight fundamental conventions. In the South Asia region, Pakistan is the second country that has ratified all eight fundamental conventions as enshrined in the ILO Declaration on Fundamental Principles and Rights at Work. The ILO works in close collaboration with its tripartite constituents towards achieving Pakistan's decent work objectives.

The ILO Governing Body has identified eight “fundamental” Conventions, covering subjects that are considered to be fundamental principles and rights at work, which are listed below:

- Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87)
- Right to Organize and Collective Bargaining Convention, 1949 (No. 98)
- Forced Labor Convention, 1930 (No. 29) (and its 2014 protocol)
- Abolition of Forced Labor Convention, 1957 (No. 105)
- Minimum Age Convention, 1973 (No. 138)
- Worst Forms of Child Labor Convention, 1999 (No. 182)
- Equal Remuneration Convention, 1951 (No. 100)
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

ILO Migrant Workers (Supplementary Provisions) Convention and the UN International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families will also be considered. Moreover, the WBG has guidelines for EHS that serve as useful references for general issues as well as sector specific activities. The WBG EHS Guidelines are mainly on occupational health and safety, community health and safety as well as on construction and decommissioning.

2.5 FEDERAL LABOR LAWS

Labor legislation in Pakistan traces its origin to colonialism, which has over time evolved through a continuous process of adjusting to the socio-economic conditions, state of industrial development, level of literacy and social welfare. Laws related to labor rights and welfare are listed below:

- Factories Act, 1934
- Industrial Relation Act, 2012
- Workman Compensation Act, 1923
- Minimum Wages Ordinance, 1961
- Payment of Wages Act, 1936
- Industrial & Commercial Employment Standing Orders Ordinance, 1968
- Shops & Establishment Act, 1969
- Maternity Benefit Ordinance, 1958
- The Mines Maternity Benefit Act, 1941
- Apprenticeship Ordinance, 1962
- Employees Old Age Benefit Act, 1976
- Prohibition of Employment of Children Act, 1938
- Employments of Children Act, 1991
- Bonded Labor Abolition Act, 1992
- Employees Cost of Living (Relief) Act, 1973
- Companies' Profits (worker's participation) Act, 1968
- Workers Welfare Fund Act, 1971
- Minimum Wages (Unskilled Workers) (Amendment) 2015
- The Disabled Persons (Employment and Rehabilitation) Act, 2015
- The Protection Against Harassment of Women at the Workplace Act, 2010
- Transgender Persons (Protection of Rights) Act, 2018

The description of these laws is provided in Annexure-1.

2.6 PROVINCIAL LABOR LAWS

In 2010, subjects of labor and employment were devolved to provinces under the 18th Amendment to the Constitution of Pakistan, as a result of which the federal labor laws became applicable on provinces under Article 270 AA (6) of the Constitution of Pakistan. The 18th Constitutional Amendment in Pakistan has altered the landscape of the labor administration system in the country. Provinces now have a greater responsibility and resources in terms of legislation and implementation. Each province has developed its own labor policy to protect worker's rights. The policy relevant to the N-5 project is the Sindh Labor Policy, 2018, Khyber Pakhtunkhwa Labor Policy 2018 and Punjab Labor Policy 2018. These Policies sets out the framework on industrial relations, social and economic wellbeing of the people of the province of Punjab, Sindh and Khyber Pakhtunkhwa.

After the Eighteenth Amendment, each province adopted various laws which comprised of labor laws, welfare and industrial relations laws, where the applicable labor laws are discussed below:

Sindh Province

- The Sindh Workers Compensation Act 2015
- The Sindh Minimum Wages Act, 2015
- The Sindh Terms of Employment (Standing Orders) Act, 2015
- The Sindh Payment of Wages Act, 2015
- Sindh Bonded Labor (Abolition) Act, 2015
- The Sindh Prohibition of Employment of Children Act, 2017
- The Sindh Occupational Health & Safety Act, 2017
- The Protection against Harassment of Women at the Workplace (Amendment) Act, 2022
- The Sindh Differently Abled Persons (Employment, Rehabilitation, and Welfare) Act 2017
- Sindh Labor Policy, 2018
- The Sindh Employees' Social Security Act, 2016

Punjab Province

- The Punjab Workmen's Compensation (Amendment) Act, 2013
- Factories Act, 1934
- Punjab Minimum Wages Act, 2019
- Punjab Employees' Social Security Ordinance, 1965
- Punjab Workers Welfare Fund Act, 2019
- Punjab Occupational Health and Safety Act, 2019
- Punjab Domestic Workers Act, 2019
- Punjab Restriction on Employment of Children Act, 2016
- Punjab Protection of Women against Violence Act, 2016
- Punjab Maternity Benefit Ordinance, 1958

Khyber Pakhtunkhwa Province

- Khyber Pakhtunkhwa Workers' Compensation Act, 2013
- Khyber Pakhtunkhwa Factories Act, 2013
- Khyber Pakhtunkhwa Minimum Wages Act, 2013
- Khyber Pakhtunkhwa Workers Welfare Fund Act, 2013
- Khyber Pakhtunkhwa Employees' Social Security Ordinance, 1965
- The Khyber Pakhtunkhwa Prohibition of Employment of Children Act, 2015
- Khyber Pakhtunkhwa Commission on the Status of Women Act, 2016
- Protection Against Harassment of Women at the Workplace Act, 2020
- Khyber Pakhtunkhwa Child Protection and Welfare Act, 2010
- Khyber Pakhtunkhwa Prohibition of Employment of Children Act, 2015

NHA and its contractors are bound to abide by the terms and conditions of the above Acts. No child labor and forced labor shall be employed at the Project site(s). The worker shall be paid compensation as per the relevant Compensation Act in case he/she suffers from accident-

causing injury during work at the Project site(s) involving all direct, contracted, and migrant workers. The description of these laws is provided in Annexure-I.

Minimum wages shall be fixed as per the Punjab Workmen's Compensation (Amendment) Act 2013, Khyber Pakhtunkhwa Workers' Compensation Act 2013 and Sindh Minimum Wages Act 2015 and any further notifications that may have been issued under the Act. All deductions, benefits shall be in accordance with the above-mentioned acts.

2.7 OVERVIEW OF OHS REGULATIONS

The project will observe and ensure the protection against OHS risks to the workers embodied in various international laws, national, and provincial laws and administrative issuances governing the public sector. Observing and enforcing OHS protection should aim at: the promotion and maintenance of the highest degree of physical, mental, and social well-being of workers in all occupations; the prevention amongst workers of departures from health and safety caused by their working conditions; the protection of workers in their employment from risks resulting from factors adverse to health; and placing and maintenance of the workers in an occupational environment adapted to his/her physiological and psychological capabilities.

Following are the national and international legislations applicable to the Project in context of OHS:

International Conventions

- ILO Technical Convention: C187 – Promotional Framework for Occupational Safety and Health Convention.
- Prevention of Major Industrial Accidents Convention, 1993 (No. 174)
- Safety and Health in Construction (1992)
- Safety and Health in Building and Civil Engineering Works (1972)

Local Legislation on OHS

- Pakistan Occupational Health & Safety Act 2018,
- Punjab Occupational Health and Safety Act, 2019,
- Sindh Occupational Safety and Health Act 2017 (Amended 2019)
- Khyber Pakhtunkhwa Occupational Safety and Health Act, 2022

The brief of these legislations is provided in Annexure-I.

2.8 AIIB'S ENVIRONMENTAL AND SOCIAL STANDARD 1: ENVIRONMENTAL AND SOCIAL ASSESSMENT AND MANAGEMENT

The AIIB's stipulations related to labor and working conditions are outlined in its ESS1. The PIU-HQ will be required to provide sound labor management relations system for project workers and provide safe and healthy working conditions. Key objective of ESS1 is to achieve the environmental and social soundness and sustainability of Projects and to support the integration of environmental and social considerations into the Project decision-making process and implementation.

ESS1 applies to project workers including full time, part time, temporary, seasonal, and migrant workers. Where government civil servants are working in connection with the Project, whether full time or part time, they will remain subject to the terms and conditions of their existing public sector employment agreement/ arrangement, and related national laws applicable to the civil service, the above-mentioned provisions do not apply to them.

In order to protect children from jeopardy to their health, safety and morals, take all measures required so that children under the age of 18 are not employed for work under the Project.

Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment. The information and documentation will set out their rights under national labor law and ESS-1 requirements (which will include collective agreements), including their rights related to hours of work, wages, overtime, compensation, and benefits. This information will be provided at the beginning of the working relationship and when any material changes occur.

The **Table 2.1** provides the conformance of the National Labor Act with the key elements of the AIIB ESS 1 related to Labor and working conditions.

Table 2.1: Conformance of the Pakistan National Labor Act with AIIB ESS 1 related to Labor and working conditions

Key Elements of ESS1	Provisions in Pakistan Labor Laws	Further Action Required
Equal opportunity and non-discrimination	The law contains important provisions prohibiting discrimination based on sex and disability, including equal wages for equal work.	No further action required
Timely payment	Wages must be paid before the expiry of the 7 th working day after the last day of the wage period. Where the employment of any person is terminated by or on behalf of the employer, the wages earned by him shall be paid before the expiry of the second working day from the day on which his employment is terminated.	No further action required
Minimum wage	The minimum wage as fixed by provinces in each year	No further action required
Work hours	Under the Factories Act 1934, no adult employee can be required or permitted to work in any establishment in excess of nine hours a day and 48 hours a week. Section 8 of the West Pakistan Shops and Establishments Ordinance, 1969 likewise, restricts weekly work hours at 48 hours that includes rest and prayer times.	No further action required
Worker rights	Regular leaves and benefits. The employer must provide reasons for termination.	LMP incorporated necessary provisions and actions.
Prevents use of all forms of forced and child labor	The national and provincial labor laws prohibit use of all forms of forced labor and child labor.	No further action required

Key Elements of ESS1	Provisions in Pakistan Labor Laws	Further Action Required
Protection of workers	The labor laws encompass a large array of rights to protect workers including the right to decent work and freedom of association to equal opportunity and protection against discrimination. Specific rights related to the workplace include health and safety in the workplace and the right to privacy at work, amongst many others.	No further action required
Occupational Health & Safety	This law provides for comprehensive OHS and empowers the Department of Labor to conduct inspections of establishments and to impose penalties for violations of non-compliance.	LMP incorporated necessary provisions and actions.
Working Age of Workers	Under the Factories act 1934, no child who has not completed his fourteenth year shall be allowed to work in any factory.	No further action required
Women	Under the Ordinance of 1958, women with at least four months employment in an establishment immediately preceding the day of delivery are eligible to get a total of twelve weeks of maternity leave, six weeks before and six weeks after the childbirth.	No further action required
Persons with Disabilities (PWD)	Persons with Disabilities Rights and Protection Act 2013 provides for rights to discrimination free employment opportunities	No further action required
Migrant Workers	No special provisions for migrant workers however the security and safety of workers/staff from abroad is ensured with due consideration as per the National Internal Security Policy of Pakistan by Interior Ministry for safe accommodation, safe travel advisory, health & medical safety and security protocols as per the	LMP incorporated necessary provisions and actions.
Contract Workers	In the case where the wages of a worker employed by a contractor are not paid by the contractor, the wages must be paid by the employer of the establishment.	No action required as no such worker involved
Freedom of Association and collective bargaining	Article 17 of the Constitution not only guarantees freedom of association but also collective bargaining as a fundamental right. Keeping in view this provision, labor law in Pakistan allows formation and joining of trade unions/associations to both the employers and the employees.	No further action required
Access to a grievance redress mechanism	Workers can seek direct civil law redress from the Labor courts for complaints regarding terms and conditions employment and wages, health and safety, maternity welfare, and child labor offences are subject to criminal prosecution.	LMP incorporated necessary provisions and actions (Worker GRM).

The **Table 2.2**, on the other hand, describes the main gaps of the government system with respect to the AIIB ESF Standards:

Table 2.2: Main Gaps of Government System with respect to AIIB ESF Standards

AIIB ESS	Legislation	Gaps
ESS1: Environmental and Social assessment and management <ul style="list-style-type: none"> E. Health and Safety F. Labor and Working Conditions, 	<ul style="list-style-type: none"> Factories Act 1934 Pakistan Occupational Health & Safety Act 2018 Punjab Occupational Health and Safety Act, 2019 Sindh Occupational Safety and Health Act 2017 (Amended 2019) Khyber Pakhtunkhwa Occupational Safety and Health Act, 2022 Khyber Pakhtunkhwa Prohibition of Employment of Children Act, 2015 Punjab Restriction on Employment of Children Act, 2016 The Sindh Prohibition of Employment of Children Act 2017 	<ul style="list-style-type: none"> The local acts do not specifically require that development be assessed and reviewed in terms of labor and working conditions including OHS requirements before approval. The local Labor Act does not require development projects to prepare Labor Management Plan/ Plans or OHS plans. The local laws lack the proactive, project-specific risk management approach advocated by the AIIB. The AIIB's ESF underscores the importance of meaningful consultation with workers and the establishment of accessible grievance redress mechanisms. However, local legislation doesn't consistently mandate such participatory processes or ensure that workers have clear avenues to voice concerns without fear of retaliation.

2.9 WBG EHS GUIDELINES

The WBG has guidelines for EHS that serve as useful references for general issues as well as sector specific activities. Projects financed by the IFIs are expected to comply with this guideline as required by the policies and the standards. The WBG EHS Guidelines are mainly on OHS community health and safety as well as on construction and decommissioning. It contains guidelines cross cutting on environmental (waste management, ambient air quality, noise, and water pollution), OHS issues amongst others, applicable to all the industry sectors³.

³ https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

3 POLICIES AND PROCEDURES

All project staff and contractors must be informed of the Project management policies and processes. Contracts must be drafted in conformity with ESS-1 principles and Local Labor Laws, and all recruitment processes must be open. Copies must be in Pashto, Urdu, Punjabi and Sindhi to the greatest extent practicable. Pashto, Urdu, Punjabi and Sindhi must be used for training sessions and procedure writing. The project team will prepare the following subsequent actions:

3.1 LABOR POLICIES AND PROCEDURES

These policies and procedures will be updated and modified, if necessary, after the allocation of the contracts of the different positions of the RIU. As specified in the national labor laws, the employment of project workers will be based on the principles of non-discrimination and equal opportunities. There will be no discrimination with respect to any aspects of the employment relationship, including recruitment, compensation, working conditions and terms of employment, access to training, promotion, or termination of employment. The following measures will be followed by contractors and monitored by the RIU with support from Human Resource Department to ensure fair treatment of all employees:

- Recruitment procedures will be transparent, public, non-discriminatory, and open with respect to ethnicity, religion, sexual orientation, disability or gender
- Applications for employment will only be considered if submitted via the official application procedures established by contractors
- Clear job descriptions will be provided in advance of recruitment and will explain the skills required for each post
- All workers will have written contracts describing terms and conditions of work and will have the contents explained to them, after which the workers will sign the contract.
- Unskilled labor will be preferentially recruited from the surrounding communities, and settlements.
- Employees will be informed at least two months before their expected release date of the coming termination.
- The contracted workers will not be required to pay any hiring fees. If any hiring fees are to be incurred, these will be paid by the Employer.
- Depending on the origin of the employer and the employee, employment terms and conditions will be communicated in two languages, in the national language and the language that is understandable to both parties
- In addition to the written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulty understanding the documentation.
- It is noted that language related problems are not expected, but if they are, interpretation will be provided for workers as necessary.
- All workers will be 18 years old or above for civil works. This will be a requirement in contracts with construction works contractors.
- Normal working time should not exceed 40 hours per week. With a five-day working week, the duration of daily work is limited by the internal work regulations approved by

the employer after prior consultation with the representatives of the workers, in compliance with the established working week duration.

The RIU will inform the PIU-HQ and AIIB of any significant event (social issues) as soon as possible, but no later than five working days, after the occurrence of the event. Such events include strikes or other workers' demonstrations. The RIU will prepare a report on the event and the corrective measures and subsequently submit it to the PIU-HQ and AIIB within 30 days of the event.

3.2 OCCUPATIONAL HEALTH & SAFETY

The NHA PIU-HQ is committed to comply with all the local laws related to OHS and other federal and local legislations as mentioned in Chapter 4. The RIU will have a designated OHS Expert for an agreed period during the implementation stage of the Project. The OHS Expert must have a minimum bachelor's degree in environmental engineering/environmental sciences and certificate in OHS i.e. National Examination Board in Occupational Safety and Health (NEBOSH) International General Certificate (IGC) with a minimum of 04 years of experience as OHS professional in construction of infrastructure projects. Extensive knowledge of all OHS legislation, OHS guidelines and standards are required. It is important that all staff must be given induction training so that they are aware of the hazards specific to the Project and its activities. This is in addition to toolbox talks and other training needs identified during project implementation.

The RIU will ensure that all workers irrespective of any category will be provided with appropriate type of protective masks, helmet, overall and safety shoes, and safety goggles, protective clothing as well as other appropriate PPEs as per work job hazard analysis and method statements (such as working on live wires). The RIU and contractors must also ensure appropriate demarcation of workplace and notices for hazardous area where applicable; accident reporting, notification and investigation practices at each workplace required; safety sign and symbols displayed at workplace and ensure availability of first aid box; also identify and service agreement done with specialized hospitals for complicated accidental and health problems as well as specific details will be included in the emergency management plan (see **Annexure-II**).

3.2.1 Occupational Health & Safety Management Plans (OHSMP)

Contractors will be required to prepare OHSMP in accordance with OHS standards mentioned in the bidding documents, OHS provisions of ESMP, compliance with the local regulatory requirements, and AIIB ESF. All OHSMPs shall have a minimum requirement to include information and details on:

- Reporting and Investigation of Incidents/Illnesses
- Procedure for Waste Management
- Procedure for Housekeeping
- Procedure for Hazard Identification and Risk Assessment
- Training Procedure including Induction training
- Toolbox Talks

- Safe Systems of Work – work at heights, hot work, electrical High Tension/ Low Tension (HT/LT) works, use/operate heavy machinery and equipment, excavation, confined spaces (Permits to Work)
- Personal Protective Equipment
- Emergency Response Procedure (especially for flood, earthquake, fire and other major emergencies)
- Monthly Reporting Procedure
- Camp Management Procedure
- Management of Food and Drinking Water at Campsite(s) and at construction site
- Project Site Security Procedure
- Internal Auditing Procedure
- Procedures for Management of Visits by AIIB and Government Agencies
- Procedures for Storage of Fuel, Hazardous substances and Other Materials
- Operation and Maintenance of Heavy Equipment and Overhead Cranes
- Child and Forced Labor Avoidance Procedures
- SEA/SH & GBV Prevention Procedures.
- Procedures specifically for Migrant Workers
- Recruitment Procedures that are transparent, public, and non-discriminatory, and open with respect to ethnicity, religion, sexuality, disability, or gender.

The Guideline for Policies and Procedures are appended in **Annex I**.

3.3 CHILD LABOR AND FORCED LABOR

To prevent engagement of underage workers, the age employment scheme should be strictly adhered to by parties involved in hiring. The process of hiring Direct Workers should include proper screening, with age verification to ensure no children under the age of 18 are employed in the implementation of the Project. Likewise, all contracts must have a provision as to the minimum age requirement and the hiring authority shall keep a registry of all hired workers. Similarly, for contracted workers, companies and entities must provide a legal undertaking highlighting that they will not indulge in child and forced labor services for activities in general and particularly in association with the Project.

3.4 LABOR INFLUX & SEA/SH/CA/GBV

All project workers will undergo relevant seminars and training to prevent risks of labor influx and SEA/SH/CA/GBV issues. Project workers particularly those coming from other communities (migrant workers) will be briefed on the culture and history of the area, allowing them to adapt to the community values and to avoid any conflicts due to the dissimilarities of their cultural backgrounds.

3.4.1 Discrimination and Exclusion of Vulnerable Groups

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 and hiring, terms of employment (including wages and

benefits), termination and access to training. This project shall comply with the national labor laws on gender equality in the workplace, which will include provision of maternity leave and nursing breaks and sufficient and suitable toilet and washing facilities, separate for men and women workers.

3.4.2 Development of a SEA/SH Action Plan and Mitigation Measures for Risks Related to Gender

All workers will be hired on the Project on zero-tolerance stance on SEA and SH, with mandatory training for all employees and contractors on appropriate conduct and the consequences of violations. All project workers are required to sign the code of conduct as provided in Annexure-III of this LMP. Confidential reporting mechanisms will be created to encourage safe reporting, and all allegations will be thoroughly investigated with transparent disciplinary action, including termination if necessary. Ongoing monitoring, awareness campaigns, and regular audits will ensure continuous enforcement of the policies and a workplace culture that promotes safety, respect, and gender equality. All these measures will be reviewed and further modified in the ESIAs/ESMPs.

3.5 LABOR DISPUTES OVER TERMS & CONDITIONS OF EMPLOYMENT

Fair, reasonable, and lawful terms and conditions shall be applied in the contractual provisions of all project workers to prevent labor disputes. Moreover, there will be an efficient GRM in place to address any issues that may arise during the existence of the contract. The guidelines provided later in the document shall be strictly observed to avoid disputes over terms and conditions of employment.

All the contractors who will be engaged for the Project will be required to produce their grievance procedure as a requirement under the tendering process which at a minimum comply with these requirements. In addition, good international practice recommends that the procedures be transparent, confidential, adhere to non-retribution practices, and include right to representation. After contractors are engaged, they will be required to produce proof that each worker has been inducted and signed that they have been inducted on the procedure.

3.6 MONITORING AND REPORTING

General Monitoring Activities: Processes for monitoring, assessment and audit will be developed to:

- Document the implementation and effectiveness of management and mitigation measures;
- Assess actual impacts against predicted impacts; and
- Demonstrate compliance with applicable legal and other requirements.

Monitoring will be undertaken for both direct hires (including casual labor) and contract workers.

The Third-Party Validation (TPV) will be carried out through independent E&S Specialists or consultants. TPV Consultants will conduct the external and independent monitoring of the implementation of this LMP and report to NHA and AIIB accordingly.

Assessments: The Resident Engineer or Site Supervisor will take a lead in undertaking periodic assessments to determine the degree to which, the commitments outlined in this LMP are being met. This will include camp inspections and monitoring of grievances.

Audits: It is envisaged that, the site supervisor or resident engineer may, at its discretion, audit the contractors or suppliers to determine their compliance with this LMP. In addition, they may also, at its discretion, undertake audits of other third-party facilities and providers, as relevant to the ESMP. The Independent Environmental and Social Consultant, on behalf of NHA may also be engaged to conduct periodic monitoring reviews of the Project, largely based on the social and environmental controls set out in the Environmental and Social Management Plan.

Performance Indicators: Performance indicators are used to measure and track performance against the effectiveness of mitigation and control measures described in this LMP. Indicators can be divided into two groups: leading indicators and lagging indicators. Leading indicators predict actions to be taken to prevent a risk from escalating - such as complaints from workers about, for example, the quality of camp food. An example of a lagging indicator would be a work stoppage over camp conditions. General performance indicators may also be relevant, such as training and awareness numbers. Performance indicators must be measurable against a specified target.

Labor and Working Conditions Performance Indicators: Performance indicators should be carefully recorded and graphed where relevant for remedial action to reduce potential risks. They will form a key component of monthly reporting by the Resident Engineer or Site Supervisor.

Non-conformance and Corrective Action: The project ESMP alongside provisions in this LMP will be all used for tracking and stewardship of non-conformances identified as part of assessment and audit activities described in this LMP.

Training and Awareness: Before the development of a training and awareness program, a needs analysis will be conducted. The needs analysis will be based on requirements of this LMP. It involves a basic assessment of the knowledge and skills of the people involved in training implementation.

Internal Reporting: A periodic report will be compiled to address the labor and working conditions aspects contained in this Plan, including the following for both Consulting Engineer and contractor activities:

Workplace:

- Grievances lodged by type and number, illustrated with graphs. Open grievances by type and number;
- Disciplinary action by type and number;
- Induction training numbers, queries and comments;
- Issues raised by workers' committees and action taken;
- Workforce numbers by local and foreign workers - actual against planned;
- Actual demobilization numbers against planned targets. Incidents around demobilization;

- Industrial relations incidents - stoppages go slows, threats, damage to property, violence;
- Lost hours by category; and
- Absenteeism, sick leave and late arrivals.

Camp:

- Grievances lodged by type and number. Open grievances by type and number;
- Disciplinary action by type and number;
- Induction training numbers, queries and comments;
- Issues raised by camp committees and action taken;
- Camp numbers by local and foreign workers, and by gender/workers from vulnerable groups - actual against planned.
- Camp incidents;
- Food or lodging complaints; and
- Recreation activities.

External Reporting: Consulting Engineer and its contractors will meet all statutory notification and reporting requirements.

Disclosure: Disclosure will be done to enable workers to understand information regarding safeguards in the workplace. This will be done during the induction period of the worker. Various tools will be used including Information, education and communication (IEC) materials and Meetings, Induction toolkit (SH/SEA & GBV, EHS company policies, safety, code of conduct, child protection etc.)

3.7 FATALITY AND SERIOUS INCIDENTS

In the event of an occupational fatality or serious injury, the RIU shall report to the PIU-HQ and Bank as soon as becoming aware of such incidents and inform the government authorities (where available) in accordance with national as well as Bank reporting requirements. The guideline incident reporting format is provided in Annexure-II of this LMP. Corrective actions shall be implemented in response to project-related incidents or accidents. The RIU, or where relevant the consultant, may conduct a root cause analysis for designing and implementing further corrective actions.

4 ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The primary risks that project operations provide to workers and other project staff are covered in this chapter. The main occupational risks are:

4.1 KEY POTENTIAL LABOR RISKS

The main labor risks associated with the Project are assessed to be:

- OHS including poor work safety culture, accidents/incidents and lack of PPE provision
- Child and Forced Labor,
- Labor influx,
- Labor disputes over terms and conditions of employment,
- SEA/ SH, CA, GBV,
- Risk from communicable disease, like HIV/AIDs,
- Risk from unsafe potable water,
- Lack of provision of basic facilities – including, water, food, toilets, washing hand facilities and medical aid.
- Unfair recruitment and selection practices which could discriminate against women and/or vulnerable groups,
- Salary, wages, and benefits that do not comply with labor laws,
- Sub-standard campsite facilities and campsite management,
- Lack of unified rules and regulations for all workers,
- Lack of proper grievance redress channel for workers;
- Disputes over unfair/early termination,
- Disputes over worker organizations.

4.2 OCCUPATIONAL HEALTH AND SAFETY RISKS

The project's construction and operation activities are primarily responsible for the OHS risks that may affect the Project's workforce, including RIU, consultants, construction workers and O&M personnel.

The typical risks include being exposed to the physical dangers of using construction equipment, working near moving traffic, operating cranes, and hoisting equipment, working on or near scaffolding, tripping, and falling, handling bitumen, burns, being exposed to noise and dust, falling objects, traffic risks from operating project-related vehicles, exposure to hazardous materials, and exposure to electrical risks from using tools and machinery. Furthermore, exposure to untreated sewage, risk of disease from vectors drawn to standing water (treated and untreated), risk of flooding, working in confined spaces, risk of acute poisoning from harmful gases/ reagents/ chemicals.

To reduce the risks to the health and safety of employees, it is crucial to identify hazards and manage associated risks. Additionally, it is projected that taking a proactive approach to risk management will lead to significant cost savings, a decrease in compensation claims, and a reduction in noncompliance with health and safety laws, with overall safer and better working conditions for all involved.

Labor related risks will be minimized by adhering to the mitigation hierarchy as shown in the **Figure 1**

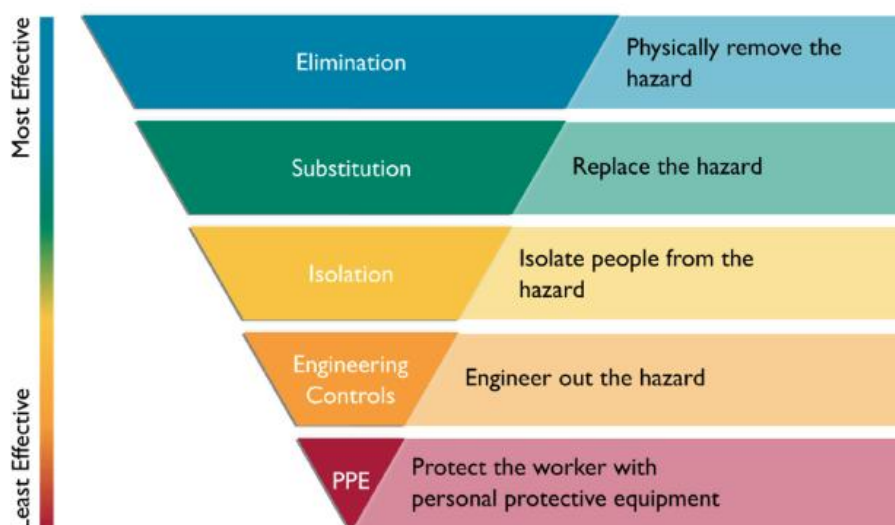


Figure 1: Hierarchy of Controls

To ensure a safe and healthy workplace, the PIU-HQ and RIU along with its consultants and contractors will take reasonable care to identify all foreseeable health and safety hazards, which hold the potential to harm employees. Hazards may arise from the work process, the equipment and materials in use, the work environment, or other people involved.

The project and all associated workers will follow occupational health and safety regulations. All contractors must include a comprehensive description of their occupational health and safety management strategy with their bids. One of the factors the PIU-HQ and RIU will consider when choosing the contractors is the applicability of these safety provisions and their previous track record in doing so. All contractors must make sure that workers wear PPE, get safety training, and take other preventative measures as specified in the AIIB ESF and WBG EHS Guidelines. Both the company and the employee are accountable for safety, where they must work together to create and implement an OHS Programme as well as safe work practices and procedures.

The **Table 4.1** provides a summary of the major OHS risks related to the Project's activities:

Table 4.1: Key Potential Occupational Hazards/Risks and Control Measures

Activity	Hazards / Risks Involved	Prevention / Control Measures
Untrained employees at jobs or illegal individuals entering the work area	<ul style="list-style-type: none"> All the risks listed in this table apply to unskilled people and are therefore relevant to all activities. Possibility of allowing incompetent staff to engage in a high-risk activity that 	<ul style="list-style-type: none"> Only physically, mentally fit, qualified, and competent people will be hired. Make sure that everyone on staff has gone through the induction procedure, which includes orientation and training on the dangers specific to the working site and the tasks to be performed. All Standard Operating Procedures (SOPs) established during project implementation stage must specify the necessary training and skills.

Activity	Hazards / Risks Involved	Prevention / Control Measures
	could harm them or others.	<ul style="list-style-type: none"> Every day before work starts, a Toolbox Talk must be completed. The work area will only be accessible to those who have completed the risk assessment. Any access to places where work is to be done must be regulated and only authorized by a responsible employee or contractor.
Shifting of material at work sites	<ul style="list-style-type: none"> Ergonomic injuries Slips, trips, and fall 	<ul style="list-style-type: none"> Create a secure entrance to the worksite. Avoid inclement weather and allow labor only during the day, when it is not too hot or raining. Keep a mobile phone on hand as a backup communication tool and a radio. Choose the least dangerous route. Use hard hats with chin straps and non-slip shoes.
Moving Machinery	<ul style="list-style-type: none"> Accidents can occur when workers come into contact with vehicles or equipment during the mobilization and use of materials and equipment. Personal Injury / Fatality / Equipment & Utility Damage Struck by vehicle Blind spot Toppling of the equipment Contact with power transmission 	<ul style="list-style-type: none"> To operate the mobile equipment to be used and to work near mobile equipment to be used, workers must have the necessary training and competence. A regular preventative maintenance inspection programme is required for all plant, including mobile equipment, and supporting infrastructure. The design and installation of guards will follow the relevant machine safety regulations. All unauthorized individuals and non-essential workers must stay outside of the operating area and swing radius of the equipment. Installation of reverse alarms and warning lights in all vehicles and large machinery. Drivers and operators must keep a maintenance log. Deeper sloping or benching for excavations will be designed. Availability of flag man. Means of access/egress (ladder) required if it is 4 feet deep or more. Spoil dirt must remain at least 1 meter from of the trench/excavation. Trench/ Excavations are to be identified and barricaded. Personnel are not permitted to work in trench excavations where water is accumulating. Fall Protection is required for walkways over deeper than 2 feet. Identification, isolation and protection of underground utilities and structures nearby to be taken care.
Chemical / Fuel	<ul style="list-style-type: none"> Chemical burns/ dermatitis/ Skin irritation. 	<ul style="list-style-type: none"> Development of safe working procedures. Reduction of number of workers exposed to hazards & duration and frequency of exposure.

Activity	Hazards / Risks Involved	Prevention / Control Measures
	<ul style="list-style-type: none"> Inhalation / Ingestion & Absorption Spillage. Fire 	<ul style="list-style-type: none"> Use of personal protective equipment. Regular environmental and medical monitoring. Availability of firefighting equipment. Earth bonding while transferring fuel. Use of drip trays. Lined secondary containment, availability of spill containment kit. Provision and Display of Material Safety Data Sheets (MSDS) Chemical & Fuel handling training for workers.
Fire	<ul style="list-style-type: none"> Accidental fires due to electrical short circuit. Burns / Fatality. Equipment Damage 	<ul style="list-style-type: none"> Automatic fire detection system and control system will be provided. Emergency back-up power will be provided for the automatic systems. Matches, cigarettes, etc. will be prohibited. Soldering, welding, or cutting torches will be used after taking hot work permit from the consent authority. Fire extinguishers with tagging will be available on contractor's camp, site offices and site.
Electrical	<ul style="list-style-type: none"> Poor electrical installations and faulty electrical appliances. Contact with live parts causing shock and burns Short circuits. 	<ul style="list-style-type: none"> Ensure safety of electrical installation and its maintenance. Provision of safe and suitable equipment. Provision of safety devices Carry out preventive maintenance. Lock Out Tag Out (LOTO) Procedure. Permit to Work (PTW) for maintenances. PPE Utilization
Manual Handling	Physical / Back Injuries	<ul style="list-style-type: none"> Use proper lifting tools Only authorized person should operate material handling equipment. Assess weight of the material, distance to be carried and hazardous etc., before lifting the load. Wear PPE's while handling of materials. Whenever possible, mechanized materials handling shall be adopted. While lifting a load physically, keep the load as near as possible to the body with feet properly placed for body balance. Bend knees, keep back straight, keep the load closed to the body and lift the load.
Hot Works	<ul style="list-style-type: none"> Burn /Personal Injury Equipment & Utility Damage Fire & Explosion 	<ul style="list-style-type: none"> Clearing the area of combustible materials Provision of suitable fire extinguishers Maintaining a careful watch throughout the work by supervisors A permit to work (PTW) system can help manage the risk on larger projects

Activity	Hazards / Risks Involved	Prevention / Control Measures
		<ul style="list-style-type: none"> Plant and equipment: select electrical and engine driven plant of suitable capacity to prevent overheating Smoking: bring the rules on smoking to the attention of all workers and visitors to the site and enforce them. Electrical installations: will be of sufficient capacity for the intended use and designed, installed, inspected, and maintained by competent people.
Lifting Operations	<ul style="list-style-type: none"> Personal Injury / Fatality Equipment & Utility Damage Equipment Failure. Falling objects 	<ul style="list-style-type: none"> Use of Inspected and certified crane and Lifting gear Cordon Off Lifting radius. Competent Crane operator & rigger/ Signaler. Ensure availability of lift Plan & load chart. Ensure ground is stable Ensure pre-operational check listing of crane. Prohibition on standing / working under suspended load. Use of Tag line to control load's movement /swing. Prohibition of lifting operation in windy conditions.
Confined Spaces	<ul style="list-style-type: none"> Personal Injury / Fatality Entrapment, oxygen deficiency, toxic & explosive atmospheres, and asphyxiation. Heat & humidity. 	<ul style="list-style-type: none"> Ensure working in confined spaces under PTW system. Effective Emergency Response Plan (ERP) Standby Men Atmospheric / Gas Testing Ventilation Illumination
Other activities	Working under Adverse Weather Conditions	Other than during emergency restoration operations where the greatest efforts must be taken to prevent any mishaps, the erection or maintenance work will not be performed during high wind, thunderstorms, or unfavorable weather conditions that would make the work hazardous.
	Risks associated with operation of vehicles (e.g, accidents)	<ul style="list-style-type: none"> For the Project, only licensed drivers will be hired. The project drivers will receive training on safe driving techniques. The cars will be kept in good working condition and equipped with all necessary safety features, such as safety belts.
	Improper use of PPE (Personal Protective Equipment)	<ul style="list-style-type: none"> All times will be spent wearing the proper PPE. Each employee must dress appropriately for the job in order to comply with PPE regulations, reducing or at the very least preventing safety risks and protecting themselves from them. PPE needs to be in good shape. PPE will only be bought from reliable vendors.
	Poor Housekeeping/ Maintenance	Facilities for employees must be sufficient, spotless, and well-maintained.

Activity	Hazards / Risks Involved	Prevention / Control Measures
		<ul style="list-style-type: none"> Where dangerous products are handled, it will be illegal to smoke, eat, or drink in the workplace. It is crucial to immediately clean up any oil or other liquid spills on the floor because they are a major contributing factor to mishaps. Aisles will be broad enough to safely and comfortably fit both people and vehicles. All tools will be routinely inspected, cleaned, and repaired, and any worn or damaged tools will be removed from service. Each trash can will have a distinct label (e.g., recyclable glass, plastic, scrap metal, etc.) Every storage space needs to be identified.
	<ul style="list-style-type: none"> Smog Considerations 	<ul style="list-style-type: none"> Use of heavy machinery and construction activities will not be carried out during intense smog. All workers will be required to use suitable PPEs Work tasks will be rearranged, or the number of workers on the jobsite reduced, to allow for social/physical distancing, or workers will be rotated through a 24-hour schedule. Communication strategy/plan to support regular communication, accessible updates, and clear messaging to employees about the most up-to-date facts and statistics, as well as applicable procedures.

4.3 CHILD AND FORCED LABOR

Workforce under the age of 18 will not be employed on construction projects under the Project in any position. Workers, as part of a contractual requirement, will be required to provide legally recognized documents such as a Computerized National Identity Card (CNIC) to verify their age in order to ensure that no children are hired to work on the Project. However, if other labor-related risks emerge during project implementation, the PIU-HQ and RIU will devise procedures to mitigate the effects. This will include regular community awareness raising sessions to educate residents on the prohibition and negative consequences of child and forced labor.

The above social impact is estimated to be low because: (i) local labor will be prioritized for use in construction activities, while measures to control the age of hired workers will be implemented; (ii) the contractor/subcontractors shall not hire child labor for project-related jobs, where a commitment not to use child labor is one of the required conditions in the bidding documents; and (iii) workers will be trained on labor safety, traffic safety, and sanitation before beginning work. (iv) Supervision Consultants, PIU-HQ and RIU staff will monitor and report the absence of forced labor.

4.4 LABOR INFLUX

The Project's focus will be on localizing economic benefits with limited opportunities for outside workers to service work that requires specialized/skilled labor which is not available in project localities. Due to the availability of local labor supply in the Project area and the scale of work anticipated under the Project; a large-scale labor influx is not anticipated. Except for a few managers, supervisors, and skilled workers, the majority of workers can be found locally or in nearby areas. The preference for local labor (based on skill and experience capacity) is expected to reduce the risk of labor influx. Specific requirements to manage risks associated with labor influx, such as interactions between project workers and local communities, will be addressed in this document through agreed standards, a Code of Conduct (**Annex III**), and training.

4.5 LABOR DISPUTES OVER TERMS AND CONDITIONS OF EMPLOYMENT

Labor disputes are unavoidable in a new construction environment. Demand for limited employment opportunities; labor wage rates and payment delays; disagreement over working conditions; and health and safety concerns in the workplace are all likely causes of labor disputes. Furthermore, employers such as consultants/contractors/subcontractors may retaliate against workers who demand legitimate working conditions, raise concerns about unsafe or unhealthy working conditions, or raise any grievances, and such situations may lead to labor unrest. However, in order to implement the Project policy on fair labor treatment in accordance with AIIB ESF, project consultants/contractors/subcontractors will be required to provide their labor with employment information while negotiating with the laborers to reach an agreement on terms and conditions of employment before signing labor contracts. The most efficient mitigating actions to deal with labor disputes during project implementation will be to monitor the implementation of the terms of work conditions that have been agreed upon by both sides and to establish the GRM for laborers or Worker GRM.

4.6 SEA/SH

Although the number of new employees will be relatively small, as previously mentioned, new employees may develop strong social ties with the local populations outside of their own social circles. This may result in undesirable and/or unlawful behavior, such as unwelcome sexual advances against women and children and SEA/SH. All consultants/ contractors/ subcontractors will be expected to follow the procedures in order to establish a written contract with their employees that is materially consistent with AIIB ESF. A Code of Conduct created by the Contractors and authorized by PIU-HQ and RIU will be required to be signed by all the employees.

4.7 E&S ISSUES OF MIGRANT WORKERS

Although the number of migrant workers will be relatively small as they will be engaged for specialized assignments. However, while working in the Project area, they may face E&S issues. Following are the key E&S issues which will be considered during the Project implementation:

- Migrant workers are at higher risk of unfair wages, unsafe working conditions, and excessive working hours.
- They may face discrimination based on nationality, ethnicity, or legal status.
- Many migrant workers are employed informally or through third-party contractors, limiting their access to labor protections and social security.
- Migrants often live in overcrowded and unsanitary housing provided by employers or contractors, which can lead to health risks.
- Migrants are more likely to be employed in high-risk jobs without adequate training, PPE, or safety measures.
- Limited knowledge of grievance mechanisms, fear of retaliation, or language barriers may prevent migrant workers from reporting workplace issues.
- Migrants are particularly vulnerable to forced labor practices, including withholding of wages, confiscation of identification documents, and coercion.
- Separation from families and lack of social integration can lead to mental health challenges and emotional distress.
- Female migrant workers are at risk of sexual harassment and exploitation, both at work and in their accommodations.

To mitigate such issues and risks, employers will comply with national and international labor standards, including fair wages, reasonable working hours, and occupational safety. Provision of confidential, accessible mechanisms for reporting and resolving complaints & grievance, ensuring protection against retaliation will be ensured. Employers will provide safe, hygienic, and dignified accommodations with adequate facilities and educate migrant workers on their rights, safety protocols through specified trainings, and access to support services in their language. Independent monitoring will be carried out to assess working and living conditions of migrant workers and enforce compliance. Promote community engagement programs to reduce isolation and foster inclusion and ensure that the issues of labor influx will be also considered in parallel while promoting community engagement.

4.8 SUMMARY OF LABOR RISKS & IMPACTS

Table 4.2 presents a summary of the potential risks and impacts related to labor and working conditions, together with mitigation measures to avoid, eliminate, or reduce associated impacts.

These labor risks and impacts are identified at a preliminary level, where they will be further explored at a site specific and Section level for each sub-project planned under the Project. Subsequently, the required mitigation measures, implementation responsibilities and execution methodologies in a specific manner shall also be described in the site-specific instruments (ESMPs/ESIAs) that will be prepared in line with the Environmental and Social Management Planning Framework (ESMPF). The impacts and mitigation measures determined in these assessments will be collated in the form of an Environmental & Social Mitigation Matrix for each sub-project, which will be made part of the contractor's bidding documents and contracts as mandatory items for compliance. A supervision consultant will be hired to oversee the implementation of each facet of the sub-projects including adherence to the environmental and social mitigation measures included in the contractor's contracts. An Independent Monitoring Consultant will also be brought on board to provide a third-party

perspective and ensure that the implementation of these mitigation measures is being carried out effectively.

Table 4.2: Identified Risks & Proposed Mitigation Measures

Category	Worker Impacts/ Risks	Project Impacts/ Risks	Mitigation Measures	Responsibility	Monitoring
Recruitment and selection of workers	Perception of unfair recruitment and selection processes	Community tensions – stop work practices that will affect implementation	Human Resource Policy, including at least: <ul style="list-style-type: none"> • Selection criteria for each position • Equal opportunities for men, women, and transgender • Method and place of recruitment • Maximize work opportunities for local citizens • Enhance local employee's skills base through training 	PIU-HQ, RIU NHA, contractors, and consultants including Supervision Consultants	Third Party Validation Consultants
Conditions of employment (earnings/ benefits)	Perceptions that wages/ salaries and benefits are less for locals relative to outsiders	Work stoppages, protests, absenteeism, sit-ins, sabotage and conflict at the workplace	The RIUs policy needs to follow: <ul style="list-style-type: none"> • Contract arrangements and content • Equal pay for equal work • Process for pay increases • Pay scales and increments as well as other benefits 	PIU-HQ, RIU NHA, contractors, and consultants including Supervision Consultants	Third Party Validation Consultants
Labor relations (conflict handling)	Workers feel aggrieved and do not know how to communicate their issues	Work stoppages, protests, absenteeism, sit-ins, sabotage, and conflict at the workplace	The RIUs policy needs to include the following: <ul style="list-style-type: none"> • Effective grievance redress process which should be gender sensitive • Disciplinary procedures • Workplace rules and regulations • Demobilization procedures • Effective information dissemination to workers 	PIU-HQ, RIU NHA, contractors, and consultants including Supervision Consultants	Third Party Validation Consultants
Labor communication mechanisms	<ul style="list-style-type: none"> • Workers are not informed about activities or events that affect them 	<ul style="list-style-type: none"> • Inadvertent actions due to rumors or incorrect perceptions 	<ul style="list-style-type: none"> • Effective communication mechanisms including: <ul style="list-style-type: none"> ◦ Regular written communication for all 	PIU-HQ, RIU NHA, contractors, and consultants including	Third Party Validation Consultants

Category	Worker Impacts/ Risks	Project Impacts/ Risks	Mitigation Measures	Responsibility	Monitoring
	<ul style="list-style-type: none"> Workers are unable to communicate collective issues plaguing them Rumors/ misinformation spreading 	<ul style="list-style-type: none"> Poor morale and unproductive work force 	<p>workers about the Project activities and operations</p> <ul style="list-style-type: none"> Worker committees/ organizations/ unions Use of notice boards/ toolbox 	Supervision Consultants	
Child Labor	Recruitment of individuals, who by virtue of age, would be exposed to hazardous situations and be subject to impaired social development	Increased health & safety risk to workforce, potential non-compliance with national labor laws, and reputational risk to the Project	Human resources and contracting policies covering recruitment and selection processes that specifically address issues associated with child labor	PIU-HQ, RIU NHA, contractors, and consultants including Supervision Consultants	Third Party Validation Consultants
Employment conditions, wages, and benefits	Perceptions that wages, salaries, and benefits are not fair	Work stoppages, protests, absenteeism, sit-ins, sabotage, and conflict at the workplace	<ul style="list-style-type: none"> Human resources policy with respect to equal pay for equal work according to the local conditions and industry averages An effective employee complaints/ grievance process 	PIU-HQ, RIU NHA, contractors, and consultants including Supervision Consultants	Third Party Validation Consultants
Worker's relations/ interaction with community	<ul style="list-style-type: none"> Disturbing nearby communities due to the worker's routine activities Communities are negatively impacted by some camp activities 	All negative actions on community may cause hindrance in the Project construction/ operation as well as other project related activities such as road blockage, community sit ins resulting in prevention of workers, and contractors from entering the Project site	<ul style="list-style-type: none"> Implement the control measures to avoid/ and or minimize the impacts of camp and living conditions of workers on communities. Control measures include: <ul style="list-style-type: none"> Encourage to recruit local labor/ staff Limited interaction of outsiders/ foreign workers with the local/ 	PIU-HQ, RIU NHA, contractors, and consultants including Supervision Consultants	Third Party Validation Consultants

Category	Worker Impacts/ Risks	Project Impacts/ Risks	Mitigation Measures	Responsibility	Monitoring
			<ul style="list-style-type: none"> nearby community of the camp ○ Provision of cultural sensitivity awareness training to facilitate appropriate actions interaction with communities ○ Limited movement of workers during the peak working hours of community 		
SEA/SH aspects	SEA/ SH risks for the communities as well as for workers	-	<ul style="list-style-type: none"> • Routes/ places used by women will be avoided as far as possible. If unavoidable, alternate routes will be identified for communities, If required, especially along routes frequented by women such as routes to local water wells • Camp sites for construction will be 500 m away from the nearest community • Construction crew will avoid entering villages and settlements • Communities will be informed and consulted before commencing works inside or near the communities • Awareness raising among communities will be carried out for SEA/SH risks 	PIU-HQ, RIU NHA, contractors, and consultants including Supervision Consultants	Third Party Validation Consultants

Category	Worker Impacts/ Risks	Project Impacts/ Risks	Mitigation Measures	Responsibility	Monitoring
			<ul style="list-style-type: none"> • Strict code of conduct will be maintained by the construction crew. Local norms will be respected • Project staff will receive training on the prevention of SEA/SH • Provision related to SEA/SH will be incorporated in the bidding documents • Workers will be required to sign the Code of Conducts prepared by the Contractors which will be reviewed, and approved by RIU • Training and awareness raising will be carried out for the workers on SEA/SH aspects • Identification and mapping of service providers 		
Worker Accommodation/ camp specifications	Accommodation is considered sub-standard which leads to discontent amongst the residents and concerns about perceived health risks	<ul style="list-style-type: none"> • Workers have low morale • Perception amongst workers that the Project does not care for their welfare, affecting the Project 	Build camps to minimum specifications. The following plans will be applied as necessary: <ul style="list-style-type: none"> • Minimum health requirements • Minimum camp specifications • Operations accommodation • Emergency Response Plan • Security Management Plan Design camp by follow international standards to accommodate labor at camp site. <ul style="list-style-type: none"> • Not more than three workers accommodated in the same room, with separate beds for each 	Contractors	PIU-HQ, RIU & Supervision Consultant

Category	Worker Impacts/ Risks	Project Impacts/ Risks	Mitigation Measures	Responsibility	Monitoring
			<p>worker, partitions to ensure privacy and a minimum distance of one meter between beds;</p> <ul style="list-style-type: none"> • Not more than one worker per five square meter (surface) and one worker per ten cubic meters (volume); • One hand wash sinks per ten persons; • One toilet per ten persons; • One urinal per fifteen persons; • One shower per ten persons; • Regular cleaning of soil and sanitary facilities and regular washing of bed linen; and • Separate storage provided for boots and PPE. • Buses for daily pick and drop from camp to site and vice versa. • Proper kitchen facilities at camp site such as sitting arrangement • Kitchen should be at walking distance • Contractor should provide gas cylinder for cooking purpose and avoid use of wood as a fuel • Light should be enough at each labor camp • Generator should be there to cop-up electricity cut-off 		

Category	Worker Impacts/ Risks	Project Impacts/ Risks	Mitigation Measures	Responsibility	Monitoring
			<ul style="list-style-type: none"> • Proper lightening on the watch tower & fencing of the camp boundary. • The waste generated from the camp site should be disposed of at approved sites; • The construction camp will be provided with toilets with soakage pits or portable lavatories or at least pit latrines. • Training of employees involved in the transportation of hazardous material regarding emergency procedures should be ensured; • Supply sufficient quantities of water at all times, either from regular taps if drinking water quality can be ensured or in bottles. • Free of cost water supply in case of bottle water • Administration must ensure the availability of water 24/h. • At each labor camp water cooler should be provided • Preparation and implementation of a traffic management plan to be approved by supervision engineer; • Building additional/separate roads to project and workers' camp sites; 		

Category	Worker Impacts/ Risks	Project Impacts/ Risks	Mitigation Measures	Responsibility	Monitoring
			<ul style="list-style-type: none"> • Organization of commute from camp to project to reduce traffic; • Road safety training and defensive driving training for staff; • Sanctions for reckless driving, speed limits on project vehicles, and route/time management where in proximity to populations, such as lower speed limits near schools and avoidance of certain times of day when more pedestrians are on the road. 		
Camp Management Practices	<p>Residents do not live in harmony and the potential for conflict arises.</p> <p>Residents do not know how to make a complaint</p>	The overall camp experience is compromised which in turn leaves workers demoralized and unproductive.	<ul style="list-style-type: none"> • Implement an induction program to be attended by all residents that covers at least the following: <ul style="list-style-type: none"> ○ Camp rules and regulations ○ Code of conduct ○ Camp grievance mechanism ○ Camp disciplinary procedure ○ Cultural awareness and relations with surrounding community; ○ Health, safety, and security ○ First aid kits are adequately stocked ○ Specifies the expected housing and management standards 	Contractors	PIU-HQ, RIU & Supervision Consultant

Category	Worker Impacts/ Risks	Project Impacts/ Risks	Mitigation Measures	Responsibility	Monitoring
			<ul style="list-style-type: none"> ○ Cooking Facilities (separate for foreign personnel, if necessary) 		
Housekeeping	The general appearance of the camp deteriorates making camp life unpleasant	The overall camp experience is compromised which in turn leaves workers demoralized and unproductive.	<ul style="list-style-type: none"> • Ensure that campgrounds and common areas are routinely cleaned and organized with appropriate signage in place • Establish easily accessible, designated smoking areas which are clearly highlighted and regularly cleaned • Ensure that equipment and facilities are kept clean and well maintained 	Contractors	PIU-HQ, RIU & Supervision Consultant

5 RESPONSIBLE STAFF AND IMPLEMENTATION ARRANGEMENT

5.1 PIU-HQ-NHA RESPONSIBILITY

The overall management of the Project is the responsibility of the PIU-HQ of NHA (E&S Cell). PIU-HQ's E&S Cell will oversee the LMP's implementation. The LMP must be followed in all aspects of the procurement process. Consultant(s), Contractor(s) and subcontractor(s) shall be hired in a transparent manner based on their experience and competency. The E&S Cell of PIU-HQ will also closely coordinate with EALS-NHA in all matters including but not limited to the induction, trainings, documentation and implementation of this LMP. The contractor(s) must ensure that all LMP requirements for labor (direct and contracted), protection, and facilities are met, and this must be included in the written agreement.

5.2 RIU(S) RESPONSIBILITY

The onsite management of the Project is the responsibility of the RIU of each project Section. RIU's E&S Staff will oversee the LMP's implementation. The LMP must be followed in all aspects of the procurement process. The E&S staff of RIU will also closely coordinate with PIU-HQ in all matters including but not limited to the induction, trainings, documentation and implementation of this LMP. The contractor(s) must ensure that all LMP requirements for labor (direct and contracted), protection, and facilities are met, and this must be included in the written agreement.

As follows, the E&S staff of RIU will implement and monitor the provision of this LMP:

- Ensure that the workers are in accordance with the E&S regulations, including the LMP and OHS provisions;
- Confirm that the duties owed to the direct workforce are carried out as outlined in this LMP and contractual documents;
- Track the Project workers' training;
- When conducting activities, keep an eye out for any potential dangers of significant safety issues;
- Create and put into action a grievance procedure for direct employees that includes tracking the progress of complaints and their outcomes as well as ensuring that complaints received from employees are quickly addressed.
- Ascertain that the Project's workers are aware of the grievance procedure;
- Keep records of the hiring process, including age and gender verification, as well as the hiring of the hired staff. Orient new hires to environmental, social, and occupational health and safety issues and provide ongoing training for these personnel.
- Report any incidents or accidents involving project personnel and information about labor and occupational health and safety performance to the PIU-HQ-NHA.

5.3 IMPLEMENTATION AND SUPERVISION CONSULTANTS

Implementation and supervision consultants will:

- Review contractors' monitoring report of LMP implementation and submit to RIU;

- Provide induction and regular training to workers on environmental, social and occupational health and safety issues.
- Taking part in the settlement of labor disputes together with the competent agencies, organizations and personnel;
- Ensure the Projects' LMP is monitored and reviewed regularly
- Monitor the training of the Project workers;
- Ensure that all the employees, contractors, and subcontractors have access to the most recent LMP at all times in a language understood by them;
- Prepare external report to Lenders (if needed).

5.4 TPV CONSULTANTS

The TPV will be carried out through independent E&S Specialists or consultants. TPV Consultants will conduct the external and independent monitoring of the implementation of this LMP. Roles and responsibilities include:

- Carry out independent monitoring of critical aspects locations during implementation of LMP;
- Monitor GRM and resolution of complaints;
- Inform NHA and AIIB of any significant impacts arising during construction;
- Observe and amend/prepare (if required) of corrective action plans; and
- Monitor plan implementation along with project Implementation Consultant.

5.5 CONTRACTORS' RESPONSIBILITIES

Occupational Health and Safety: To guarantee adherence to every LMP requirement, the contractor(s) must appoint Labor and OHS representative(s). Every month, the contractor must give the RIU a report on all incidents. The contractor is responsible for ensuring that employees are taught in using personal protective equipment and safety precautions.

Immediately notifying the RIU of serious situations is required. Regular meetings between the RIU of NHA and the contractor(s) will be held to assess progress and make sure that the OHS requirements of the LMP have been met. Follow-up on the action plans developed for the accidents that happened on specific sites. When executing the safety measures in the LMP, any challenges must be addressed by the contractor.

Labor and Working Conditions: Contractors shall maintain records in compliance with the procedures set forth in this LMP. RIU may at any point request records in order to verify that labor rules are being observed. The RIU will compare records to actuals at least once every month and, if required, may mandate rapid corrective action. A summary of issues and solutions will be delivered in quarterly reports to the AIIB.

Worker Grievances: Contractors will be required to establish a grievance redress system for employees that satisfies the minimum requirements of this LMP. The RIU's E&S Staff will review all records on a monthly basis. In instances where workers' complaints are not resolved by the national/provincial system, the PIU-HQ will nonetheless remain informed of decisions and reflect in quarterly reports to the AIIB.

Additional Training: Each contractor is required to, at all times, have a qualified Labor and OHS Representative on board. If training is required, this will be the contractor's responsibility. The Labor and OHS Representative will provide instructions to contractor staff. RIU will also arrange training to address risks associated with labor influx and will also provide a schedule for training required. The contractor will be obligated to make staff available for this training, as well as any additional mandatory trainings required by RIU, as specified by the contract.

The staff will receive training on the prevention of SEA/SH, codes of conduct, as well as on gender and GBV in general. The RIU will be responsible for (i) training, (ii) implementation, and (iii) supervision of OHS aspects.

It will be a condition in the construction contracts that the contractors give preference to local labor. This entails that wherever possible, unskilled work opportunities should be made available to community members.

6 AGE OF EMPLOYMENT

This Chapter explains the standards and methodology for determining the minimum age of labor for NHA.

6.1 MINIMUM AGE FOR EMPLOYMENT IN THE PROJECT

Article 11(3) of the Constitution of Pakistan prohibits the employment of children below the age of 14 years in any factory, mines, or any other hazardous employment. In accordance with this Article, the Employment of Child Act (ECA) 1991 does not permit child labor in the country. The ECA defines a child as a person who has not completed their fourteenth years of age, where it further states that no child shall be employed or permitted to work in any of the occupation set forth in the ECA or any workshop wherein any processes defined in the Act is carried out. The NHA RIU and its contractors will be bound by the ECA to disallow any child labor at the Project sites or campsites.

Under the Factories Act 1934, Khyber Pakhtunkhwa Factories Act 2013 and Sindh Factories Act, 2015, no adult employee, defined as a worker who has completed his or her 18th year of age, can be required or permitted to work in any establishment in excess of nine hours a day and 48 hours a week. Similarly, no young person under the age of 18, can be required or permitted to work in excess of seven hours a day and 42 hours a week. The Factories Act, which governs the conditions of work of industrial labor, applies to factories, employing ten or more workers.

According to the AIB ESF and the Punjab Restriction on Employment of Children Act, 2016, The Khyber Pakhtunkhwa Prohibition of Employment of Children Act, 2015 and Sindh Prohibition of Employment of Children Act of 2017, no one under the age of 18 may be hired to work at the Project site (s). The hiring process must specify how candidates' CNICs will be checked, so that no one under the age of 18 can be hired on site. It is necessary to inspect and confirm the applicant's original CNIC. The contractor(s) and the recruiting agents will be held accountable if any underage workers are discovered to be working on the Project site(s). They will be fined and have their contracts terminated.

Under the ILO C138 (Minimum Age Convention, 1973), each Member of the Convention undertakes to pursue a national policy designed to ensure the effective abolition of child labor and to raise progressively the minimum age for admission to employment or work to a level consistent with the fullest physical and mental development of young persons. Article III thereof provides: (a) the minimum age for admission to any type of employment or work which by its nature or the circumstances in which it is carried out is likely to jeopardize the health, safety or morals of young persons shall not be less than 18 years; (b) the types of employment or work to which paragraph 1 of this Article applies shall be determined by national laws or regulations or by the competent authority, after consultation with the organizations of employers and workers concerned, where such exist; (c) notwithstanding, the provisions of paragraph 1 of this Article, national laws or regulations or the competent authority may, after consultation with the organizations of employers and workers concerned, where such exist, authorize employment or work as from the age of 16 years on condition that the health, safety, and morals of the young persons concerned are fully protected and that the young persons

have received adequate specific instruction or vocational training in the relevant branch of activity.

Contractors will be required to verify and identify the age of all workers, to ensure that all are 18 or over, regardless of the task to be performed. This will require workers to provide official documents, which would include a birth certificate, CNIC, passport, or medical or school record. If a minor under the minimum labor eligible age is discovered working on the Project, measures will be taken to immediately terminate the employment or engagement of the minor in a responsible manner, considering the best interests of the minor.

6.2 AGE VERIFICATION

Prior to the engagement of labor, age verification must be done and documented. Where available, verify the birthday on official records like a birth certificate, national identification card, or other reliable sources.

7 EMPLOYMENT TERMS AND CONDITIONS

This Chapter defines the employment terms and conditions applicable to the Project employees and shall be mandated in terms of application by the RIU.

7.1 GENERAL REQUIREMENTS

The employment terms and conditions applicable to project employees as set out in the labor rules will apply to project employees who are assigned to work on the Project (Direct Workers). Terms and conditions of part-time workers are determined by their individual contracts.

The contractors' labor management plan will set out terms and conditions for the contracted and subcontracted workers. These terms and conditions will be in line, at a minimum, with this LMP, the respective Factories Act of each province, and specified in the standard contracts to be used by the PIU-HQ NHA under the Project.

A contract of employment, written in a language known to all parties, shall be executed between the PIU-HQ and the direct worker that specifies the following:

- The parties involved, including the name of the worker, age, citizenship, civil status, gender, and address;
- The vulnerability status which will be assessed based on various indicators, such as those living below the poverty line, women-headed households, and individuals with disabilities, among others. Moreover, consultations with vulnerable groups, or number of participants with key vulnerability markers (e.g., disability) will also be monitored/tracked through their Identification details collected during the implementation.
- Location of work with regard to the needed services, acceptance of the parties, qualifications of the worker, and attestation that the worker is not related within the third degree of consanguinity or affinity to the hiring authority and/or its representative, and the worker has not been previously dismissed from government service by reason of administrative offense;
- Terms and Conditions of the contract, including the hours and place of work, remuneration payable to the worker, job description, summary of deliverables, duration of contract, procedure for suspension or termination of contract, statement that there is no employer and employee relationship between the contracting parties.

As provided in the Factories Act 1934, Khyber Pakhtunkhwa Factories Act 2013 and Sindh Factories Act, 2015 each worker who has completed a period of 12 months continuous service in a factory shall be allowed, during the subsequent period of twelve months, holidays for a period of fourteen consecutive days. If a worker fails in any one such period of twelve months to take the whole of the holidays allowed to him or her, any holidays not taken by him or her shall be added to the holidays allotted to him or her in the succeeding period of twelve months.

A worker shall be deemed to have completed a period of 12 months continuous service in a factory without considering any interruption in service during those 12 months due to sickness, accident or authorized leave not exceeding 90 days in the aggregate for all three.

7.2 NON-DISCRIMINATION & EQUAL WORK OPPORTUNITIES

Article 19-A of the Constitution imparts the State's obligations aimed at achieving equality in the form of securing the well-being of the people, regardless of sex, caste, creed, or race, by raising their standard of living, by preventing the concentration of wealth and means of production and distribution in the hands of a few to the detriment of general interest and by ensuring equitable adjustment of rights between employers and employees.

The NHA PIU-HQ is committed to equal opportunities for all its employees and potential employees where everyone is treated with respect and dignity, where there is equal opportunity for all. All employees under NHA, regardless of their affiliation, will be treated fairly and with respect. Selection for employment, promotion, training, or any other benefits will be on the basis of aptitude and ability. Decisions about pay and benefits, terms and conditions of employment, appraisals, dismissal, or redundancy will be made objectively and without unlawful discrimination. All employees will be helped and encouraged to develop their full potential, and the talents and resources of the workforce will be fully utilized to maximize the efficiency of the organization.

The NHA PIU-HQ will ensure that:

- Equality and non-discriminatory policy are adhered to within its own area of responsibility;
- Spread awareness on the equality in employment policy to the attention of the team members;
- Ensure that information on the equality of opportunity is included in all indication processes; and
- Ensure that the team members are available to attend relevant quality training programs (if any)

The PIU-HQ is responsible for assuring that equality in employment is effectively communicated to all employees and all those involved with the organization at whatever level of position and for providing guidance where appropriate. It will also, in particular, provide full text and induction on equal opportunities to all new employees; translate this policy into Urdu and any other traditionally spoken languages and send to all relevant involved parties. In addition, upon any significant update, this policy will be presented to all members of staff or at department/ office meetings and re-translated to all relevant involved parties.

Each member of staff has a responsibility to:

- Follow any measures introduced to ensure equality of opportunity and prevent discrimination, harassment, or bullying
- Report any discriminatory acts
- Treat others fairly without prejudice
- Promote a work environment where an individual can feel valued and realize their potential whilst encouraging others to do so also

Failure to comply with the policy, procedures and practices outlined below will be considered within the framework of the RIUs disciplinary procedure. The RIUs equal opportunity policy also covers bullying and harassment issues at the workplace and in any work-related setting outside the workplace.

7.3 WORKING HOURS

As per the Factories Act, 1934, Khyber Pakhtunkhwa Factories Act 2013 and Sindh Factories Act 2015, the Shops and Establishment Ordinance, 1969 (Section 8) and the Road Transport Ordinance, 1961 (Section 4) are used to determine working hours and any rest time in different industries.

Factories act states “no adult worker shall be allowed (or required) to work in a factory for more than 48 hours in a week: if the factory is seasonal, 50 hours a week and if the work is of continuous nature, he may work for 56 hours in a week. As for the daily hours, these may not be more than 9 hours a day (in case of seasonal: 10 hours). The working hours of an adolescent (15-18) are 5 hours in a day. The Factories Act is applicable to all areas employing 10 or more workers. The law makes provisions for one weekly holiday and if that is not given, a compensatory holiday must be given as soon as possible.

The Shops and Establishments Ordinance 1969 also limits weekly working hours to 48 hours. The ordinance also covers shops and commercial establishments not regulated by the Factories Act, where it states that any adult worker is required to work overtime, if asked, where the rate of overtime payment is double the usual pay (Section 47). Overtime is not payable to the contract workers who are employed on a piece rate basis. The normal hours of work for project workers shall not exceed 8 hours a day for 5 days for a total of a 40-hour work week, exclusive of time for meals. Where exigencies of the service require such personnel to work for 6 days or 48 hours, the Project workers shall be entitled to a compensatory time off to offset the overtime rendered. No worker shall be allowed to render services beyond the 48-hour overtime.

7.4 LEAVES & WEEKLY REST

Each project worker is entitled to a 2-day rest period during weekends (Saturday and Sunday). Workers shall be entitled to a rest day on regular holidays recognized by the province. Each worker is entitled to 10 days casual leave with full pay during a year. Workers are also entitled to 16 days sick leave with half pay (8 days with full pay) in a year. Festival holidays as notified by the provincial government with full pay (usually 10-13) are also allowed. If a worker is required to work on a festival holiday, he will be given one day additional compensatory holiday with full pay and a substitute holiday (300% of usual wages).

7.5 MATERNITY LEAVE

If a worker has completed 12 months of continuous service in a factory, they shall be allowed a paid annual leave of 14 consecutive days. Under the Maternity Benefits Ordinance 1958, leave is also allowed to pregnant women for a period of 12 weeks with full pay. It is unlawful for an employer to dismiss a women worker who is on maternity leave. The qualifying period for getting this leave is 4 months of preceding employment with the employer.

7.6 REMUNERATION

The laws relating to fixation and payment of remuneration include the Punjab Minimum Wages Act, 2019, The Khyber Pakhtunkhwa Minimum Wages Act, 2013 Sindh Payment of Wages Act 2015, the Sindh Minimum Wages Act 2015 and the Sindh Terms of Employment (Standing Orders) Act 2015.

7.7 WORKERS' WELFARE

The workers' welfare legislation includes Employees Old Age Benefits (EOAB) Act 1976 (with provisions for old age pension, old age grant, invalidity, and widow(er) pension). This Act is applicable to establishments employing five or more workers. Contribution has to be made both by the employer (5% of minimum wages) and employee (1% minimum wages). Employees Social Security Ordinance 1965 (applicable like the EOAB Act) provides benefits to employees in case of sickness, maternity, employment injury or death. The amount in this scheme is contributed only by the employer to workers or their legal heirs in case of death, permanent total disablement, permanent partial disablement, and temporary disablement during working in an establishment. The Standing Orders 1968 also provides for compulsory group insurance against natural death and injury for all the permanency employees in a workplace.

7.8 TERMINATION OF CONTRACT

The contract of employment shall cease at the end of the period stated in the contract. However, the contract may be pre-terminated by the hiring authority due to breach of any provision thereof, breach of trust, loss of confidence, and for reasons detrimental to the interest of the agency, provided that the Project worker is informed in writing at least 30 days prior to the effectivity of such termination. Likewise, the Project worker may pre-terminate the contract provided that a written notice is submitted to the hiring authority, stating therein the reasons for the pre-termination, at least 30 days prior to the proposed date of effectivity thereof, and the same has been received, accepted, and approved in writing by the hiring authority.

Industrial and Commercial Employment (Standing Industrial and Commercial Employment (Standing Orders) Ordinance 1968 was enacted to address to the contractual relationship between employer and employee. The ordinance is applicable to establishments employing 20 or more workers. The ordinance classifies workmen in six classes: permanent, probationers, badli, temporary, apprentices and contract workers (the last category was added in 2006). The legislation requires that workmen should be provided the contract in writing, showing the terms and conditions of his service, at the time of hiring, promotion and transfer. It also requires that the wage rates paid to different categories of workers/work should be posted on the notice boards.

Termination of an employment contract may be either termination simpliciter, which is termination on grounds other than misconduct after a notice (section 12) or termination on account of misconduct (section 15). Notice of termination, for termination simpliciter, is mandatory for permanent employees. A notice of one month must be served before severing the employment relationship or payment of one month's wages in lieu of notice may be provided (Section 12.1). The law also obliges the employer to provide the termination

certificate in writing stating the reason behind it. Although there is no specific provision for just cause dismissal, the requirement of written termination letter and section 41 of IRA 2008 which allow the labor court to inquire into the legitimacy of termination provide that there should be bona fide and valid reason for dismissal.

Termination on account of trade union membership and activity is an invalid reason for termination (ILO, 2000). While termination is being done on account of misconduct, worker has still the right of fair hearing. Of the many types of misconduct is “go slow”, for which a worker can be fired. Termination on economic reasons/retranchment has not been focused in law; however, law does provide the procedure of retranchment (last come, first go) and preference for rehiring of retrrenched workmen. In case of laying off the workers, they must also be given due notice or payment in lieu of notice. If the employer wants to close down the whole business or is terminating the employment of 50 or more workers, it must get the prior approval of labor court. An individual whose employment is terminated has first to use internal mechanisms for dispute resolution, however if he is not satisfied with the decision, he may appeal to the labor court. In that case, labor court is authorized to go into all the facts of the case and determine whether the termination was valid and bona fide or not. The above-mentioned ordinance also provides for severance pay/gratuity to be paid (when an employee resigns or his services are terminated other than misconduct) equivalent to 30 days wages for every completed year of service or any part thereof in excess of 6 months (for 20 years of service, this means 90 weeks of severance pay).

7.9 DEDUCTIONS

No deductions other than those agreed upon in the contract or those prescribed by law or regulations shall be made from a worker’s remuneration. The hiring authority is prohibited to demand or accept from the worker any cash payment or gifts in return for admitting such worker to employment or for any other reasons connected with the terms and conditions of employment.

7.10 MEDICAL TREATMENT OF SICK & INJURED WORKERS

Any worker subjected to any illness, injury, or accident which was sustained during the work period shall be transported to the nearest clinic or hospital by the hiring authority or its representative.

7.11 ACCIDENT INSURANCE AND COMPENSATION

Accident Insurance (AI) helps protect the employees against the financial burden that accident-related costs can create. Accident insurance complements other benefits, including traditional health care insurance. When combined with Critical Illness or Hospital Indemnity insurance, AI offers employees an affordable, complete benefits Section with the option of little or no direct cost to on company. The employer will ensure the appropriate accidental insurance which provides financial protection and support to employees in case of accidental injuries, disabilities, or death during work or other specified conditions. The accidental insurance typically includes Accidental Death, Permanent Total Disability (PTD), Permanent Partial Disability (PPD), Temporary Total Disability (TTD), Medical Expenses,

Funeral Expenses and Additional Benefits such as Emergency Transport Costs, Rehabilitation Costs, Mental Health Support, etc.

7.12 INCENTIVES AND FINES

Motivate employees to prioritize OHS compliance and recognize positive contributions such as recognition awards ("Safety Star of the Month" or "HSE Champion" for outstanding contributions to safety or sustainability) financial rewards (Bonuses for achieving zero-incident milestones, non-monetary rewards (extra leave days, gift cards, or training opportunities) and team incentives (celebratory events or collective rewards for departmental safety achievements). These incentives will be provided to employee for:

- Reporting and mitigating potential hazards.
- Proposing innovative safety or environmental solutions.
- Consistent compliance with PPE usage and safety protocols.
- Achieving zero environmental incidents or waste reduction goals.

In Contrast to above, employees accountable for unsafe practices and non-compliance such as monetary penalties (fines proportional to the severity of violations, such as failure to wear PPE or tampering with safety equipment), disciplinary actions (warnings, suspension, or termination for repeated or serious breaches), mandatory retraining (compulsory participation in HSE training programs for violators) and deductions from performance scores (impact on bonuses or performance reviews due to violations). These fines will be applicable to employee due to not limited to the following:

- Non-use of PPE.
- Unsafe Work Practices (e.g., ignoring lockout-tagout procedures).
- Environmental Violations, such as unauthorized waste disposal.
- Failure to Report Incidents.

7.13 COLLECTIVE AGREEMENTS

The duty to collectively bargain arises only between the “employer” and the “employee”. Where neither party is an “employer” nor “employee” of the other, no such duty would exist. Considering that the terms and conditions provide that no employer-employee relationship shall exist between the contracting parties, there is no duty to bargain collectively.

Collective bargaining has also been called a fundamental right which emanates from article 17(1) of the Constitution. A trade union can move application for determination of Collective Bargaining Agent (CBA) if it has its members not less than one-third of those employed as workmen. However, if more than one union exists in the premises, the registrar of trade unions will conduct a secret ballot election/referendum and will issue the CBA certificate to union securing votes not less than one third of total votes. If none of the union is able to get one third of total votes, a run-off election between the top two unions will be held and the union getting majority votes will be certified as collective bargaining agent. Not every workman employed in the premises is eligible for voting (Section 24.5). When a union is certified as a CBA, no application for (re)determination of CBA can be made for a period of two years except where

the registration of trade union/CBA is cancelled. The CBA is entitled to undertake collective bargaining with the employer or employers on matters connected with employment, non-employment, the term of employment or the conditions of work other than matters which relate to the enforcement of any right guaranteed or secured to it or any workman by or under any law, other than this Act , or any award or settlement; represent all or any of the workmen in any proceedings; give notice of, and declare, a strike and nominate representatives of workmen on the Board of Trustees of any welfare institutions or Provident Funds (IRA 2008: Section 24.13).

7.14 CONTRACTOR'S OBLIGATION AND MANAGEMENT

The contractor(s) will be primarily responsible for ensuring the preparation and implementation of site specific LMP along with other E&S instruments. The provision of providing employment to the local people will be ensured in contract agreement and the contractor will prepare a Local Employment Plan within one month of award of contract for its implementation. The provision of the OHS mitigation and management cost will be made in the total cost of project, for which the contractor(s) will be paid on the basis of monthly compliance reports and actual work done at site along with resource loading. The contractor will ensure the availability of the required E&S staff for LMP implementation at site from the start of the Project (at mobilization stage) and organogram will be dually approved from SC, RIU, PIU-HQ-NHA. Contractor(s) will ensure the involvement of almost 70% local labor (especially unskilled labor) at site with due consideration on gender diversity, equity and inclusion as per the current site conditions.

8 WORKER GRIEVANCE REDRESS MECHANISM

For the Project, the PIU-HQ NHA, supervision consultants and its contractors will establish a separate GRM (or make provisions in the overall GRM) for the Project workers to address labor or workplace related concerns consistent with the applicable national and provincial laws and AIIB's ESF requirements before the Project Effectiveness. Anonymous reporting mechanisms will be established to ensure the confidentiality requirements of the complainant(s). Detailed worker GRM is provided in SEP of this Project.

8.1 WORKER GRIEVANCE REDRESS COMMITTEE (GRC)

Worker will firstly raise their grievances at their company (contractor) level as per the contractor's policy. The contractor will establish its own committee which will consist of Project Manager and ensure representation of OHS and E&S representatives.

If not satisfied with the outcome of the grievance at the contractor level, the aggrieved party will be able to access the Worker GRC established at sub-project / Section level, where this GRC will be responsible for the redress mechanism in the areas of labor, environment, and social aspects along with project management.

Besides above, a worker GRC has also been established and notified consisting of the following members:

- Project Director N5, Head/ Convener of Worker GRC
- Concerned Deputy Project Director;
- Representative from NHA Safeguard Team and PIU-HQ – if required;
- Environment, social and OHS Experts, RIU;
- Project Manager from Contractor;
- Resident Engineer and E&S Representative from SC; and
- Service providers on these issues will be engaged – if required.

Efforts will be made to ensure that the worker will not negatively be affected by the Project. Therefore, the contractor's contract will include provisions for mandatory reporting of all incidents related to worker's grievances.

8.2 SEXUAL EXPLOITATION AND WORKPLACE SEXUAL HARASSMENT

Specific arrangements within existing GRM will be established specifically for the purpose of confidentially receiving grievances related to SEA/SH/Child Abuse. All SEA/SH/Child Abuse related complaints, with the survivor's consent, will be referred to the Project GBV committee (separately established for these issues). Detail of GBV Committee is provided in SEP.

9 MONITORING AND REPORTING

As part of the ESMP or related management plans, a monitoring and reporting system is required as RIU, supervision consultant and contractor of the Project will have to monitor the implementation progress and report to the AIIB.

Key Performance indicators are used to measure and track performance against the effectiveness of mitigation and control measures described in this Plan. Indicators can be divided into two groups: leading indicators and lagging indicators. Leading indicators predict actions to be taken to prevent a risk from escalating - such as complaints from workers about, for example, the quality of camp food. An example of a lagging indicator would be a work stoppage over camp conditions. General performance indicators may also be relevant, such as training and awareness numbers. Performance indicators must be measurable against a specified target. The monition and reporting against specific performance indicators outlined in **Table 9.1**.

Table 9.1: Monitoring and Reporting of LMP

Performance Indicator	Measurement	Target/ Benchmark	Frequency of Report	Responsibilities
Grievances Lodged	Type and number	Closed or adequately responded to within 30 days	Monthly	PIU-HQ, RIU & Supervision Consultants
Disciplinary cases	Type and number	Reduction in disciplinary breaches	Monthly	PIU-HQ, RIU & Supervision Consultants
Pay slip queries	Type and number	Downward trend	Monthly	PIU-HQ, RIU & Supervision Consultants
Lost hours due to site working action	Lost hours	Zero	Monthly	PIU-HQ, RIU & Supervision Consultants
Camp committee issues raised	Type and number	Closed before next meeting	Monthly	PIU-HQ, RIU & Supervision Consultants
Food or lodging complaints	Type and number	Reduction and/or downward trend	Monthly	PIU-HQ, RIU & Supervision Consultants
Training and Capacity Building	Training Records (Type and numbers)	Reduction in probability of key labor risks and impacts	Monthly	PIU-HQ, RIU & Supervision Consultants
Vulnerable Groups including women	Employment data, trainings provided, social programs implemented	Reduce the vulnerability	Monthly	PIU-HQ, RIU & Supervision Consultants

10 TRAINING AND CAPACITY BUILDING

Training for workers shall include health promotion, hazards associated with their work, health risks involved or to which they are exposed to, preventive measures to eliminate or minimize risks, steps to be taken in case of emergency, and safety instructions for the jobs, activities and tasks to be handled by workers; SEASH/GBV risks, policies, code of conduct etc.

- All personnel engaged in any kind of hazardous works shall undergo specialized instructions and training on the said activities.
- All workers, including new hires, shall be provided training and information for all types of hazards in the workplace in a language and dialect that they can understand. Training and information materials used shall be made readily available and accessible to workers.
- A re-orientation on safety and health for workers must be conducted regularly, not less than once a quarter, and to be conducted immediately following any changes in the operations and production process.
- Appropriate training and certification specialized agencies shall be a requirement for operators before use of equipment, if applicable.
- Employees shall participate in the OHS information and education program, trainings and other related initiatives of the agency to contribute to the improvement and sustainability of the same.
- Issuance of PPE shall be supplemented by training on the application, use, handling, cleaning, and maintenance of said PPE.
- SEA/SH: All employees and workers shall attend awareness trainings on gender diversity, internal procedures regarding workplace sexual harassment, Code of Conduct (CoC), guidelines to prevent and punish harassment.

A comprehensive training program will be proposed in ESIA/ESMP along with its cost estimate which will include the labor and working conditions related aspects. This program will be applicable to as a part of this LMP implantation.

11 CONTRACTOR MANAGEMENT

The Project PIU-HQ Team shall select contractors through a transparent process. It will review the following during the contractor selection process:

- Knowledge gathered through publicly available sources, such as company registers and papers pertaining to alleged infractions of applicable labor laws, such as inspection reports and other documentation from enforcement agencies;
- Business licenses, registrations, permits, and approvals;
- Labor management system documents, such as LMP, that address OHS concerns;
- Identification, credentials, and certifications of labor management, safety, and health employees;
- Workers' certifications/permits/training to perform required work;
- Records of safety and health violations, reactions, recordable occurrences, and accompanying Root Cause Analysis (lost time incidents, medical treatment cases), first aid cases, high potential near misses, and necessary corrective and preventive actions (for example, revised job safety analysis, new or different equipment, skills training, and so forth);
- Accident and fatality records and notifications to authority's/ lending agencies;
- Records of the benefits that employees are legally required to receive and evidence that they have enrolled in the relevant programmes;
- Worker payroll records, including hours worked and pay received;
- Identification of safety committee members and records of meetings; and
- Copies of prior agreements with suppliers and contractors that have clauses and terms that are materially consistent with AIIB ESF 2016 (amended 2024).

The contract document shall include the contractor's commitment to:

- Providing a construction management plan that includes reporting all pertinent project information, including workplace accidents;
- Employing suitably qualified personnel for high risk jobs;
- Taking into account all occupational, safety and health considerations for its workers and at the site(s);
- Provision of first aid facilities;
- Provision of hygienic canteen and rest facilities at the site(s) and in camps (if applicable);
- Provision of PPE commensurate with the nature of job;
- Provision of traffic management plan;
- Conformance of all labor laws and regulations;
- Written code of conduct;
- Emergency response plans;
- Provision of site security plan;
- Labor influx management plan;
- Prohibition of child labor and forced labor;
- Employment of female workers for certain jobs and sexual harassment prevention

12 CONTRACTED WORKERS

Based on the requirement in the various sub-projects, the contractors will employ workers and labourers based on their level of skills and the needs of the Project, where, if agreeable to the PIU-HQ, RIU, sub-contractors may also be brought on board. These sub-contractors may supply labourers as per the agreed terms and conditions defined in this document. The same set of requirements and standards shall be applicable on contracted workers as defined throughout the document. The implementation of these mitigation measures shall be overseen by the supervision consultant, where the workers GRM will be available as a corrective mechanism to rectify any issues that may arise.

The number of contracted workers for the different Sections under the Project will be estimated in the later stages under the detailed design.

13 MIGRANT WORKERS

Based on the requirement in the various sub-projects/Sections, the Project will involve migrant workers who might be contracted to perform specific duties that might require special expertise that cannot be sourced locally, in this project, the likelihood of migrant workers is very low. The OHS and Community Health and Safety related requirements and standards as mentioned above in this LMP shall be applicable on migrant workers as defined throughout the document. The implementation of these mitigation measures shall be overseen by the supervision consultant, where the workers GRM will be available as a corrective mechanism to rectify any issues that may arise.

The number of migrant workers for the different Sections under N-5 will be estimated in the later stages under the detailed design. It is assumed that less than 30% of the labor will be migrant, for which accommodation will be required. The migrant workers and staff will be accommodated on-site at temporary labor camps or in rented houses in surrounding settlements of the Project.

ANNEXURES

ANNEXURE I – APPLICABLE LAWS AND REGULATIONS

APPLICABLE LAWS AND REGULATIONS

1 NATIONAL LABOR LEGISLATIONS

1.1 FEDERAL LABOR LAWS

Labor legislation in Pakistan traces its origin to colonialism, which has over time evolved through a continuous process of adjusting to the socio-economic conditions, state of industrial development, level of literacy and social welfare. The most pertinent of these are discussed below:

1.1.1 Factories Act, 1934

The Factories Act, 1934 concerns regulation of labor in factories and addresses issues regarding working condition, child labor and working hours for men and women labor, wages, working hours, rest interval, overtime, holiday and health and safety. The Factories Act also briefly refers to environmental issues. Section 14 deals with the disposal of industrial wastewater and states that “effective arrangements shall be made in every factory for the disposal of wastes and effluents due to the manufacturing process carried on therein.” The Factories Act states that “the Provincial Government may make rules prescribing the arrangements to be made under sub-section (1) subject to the approval of such authority as may be prescribed. This allowed the provincial governments to establish Minimum Wages Act, 2015.

1.1.2 The Industrial Relations Act, 2012

The Industrial Relations Act 2012, aimed at regulating the labor-management relations in the country, and allows to bring workers grievance to the attention of his or her employer, in writing, either him or herself, through the shop steward or through his or her trade union within three months of the occurrence of the cause of action. Forms of termination have been described as removed, retrenched, discharged or dismissed from service. To safeguard against abuse of power, victimization or unfair labor practices, the Labor Courts have been given powers to examine and intervene to find out whether there has been a violation of the principles of natural justice and whether any action by the employer was real or unjust.

1.1.3 West Pakistan Maternity Benefits Ordinance, 1958 (The West Pakistan Maternity Benefit Rules, 1961)

The law is applicable to female workers across the board within all establishments. Female workers are entitled to 12 weeks’ maternity leave. Every employer is liable for payment of maternity benefits at the rate of her wages last paid during the period of six weeks immediately preceding and including the day on which the female worker delivers a child, and for each day of six weeks succeeding the day.

1.1.4 The Industrial and Commercial Employment Act, 2013

The law governs the industrial relationship between the employer and the workers to maintain industrial peace and settle disputes between them by negotiations, reconciliations, arbitration, and adjudication. This Act establishes and provides procedures for settling grievances and resolving disputes between workers and employers. It also specifies the procedure for lockouts and strikers and confers upon the right to establish or join trade unions of their own choices.

1.1.5 The Employees Old-Age Benefits Act, 1976

The Employees Old Age Benefits (EOAB) Act 1976 provides for certain old age benefits for the persons who are employed in industrial, commercial, and other organizations.

1.1.6 Minimum Wages (Unskilled Workers) Act, 2013

The Government has announced that “the minimum wages would be increased from Rs. 12,000 to 13,000 per month (w.e.f 1st July 2015). Since then, the minimum wages have been reviewed annually. The current minimum wage, as announced in July 2022, was to be Rs. 25,000 per month in Sindh.

1.1.7 The Disabled Persons (Employment and Rehabilitation) Act 2015

The Disabled Persons (Employment and Rehabilitation) Act 2015 provides for the employment, rehabilitation, and welfare and wellbeing of disabled persons.

1.1.8 Employment of Child Act (ECA), 1991

Article 11(3) of the Constitution of Pakistan prohibits employment of children below the age of 14 years in any factory, mines, or any other hazardous employment. In accordance with this Article, the Employment of Child Act (ECA) 1991 disallows the child labor in the country. The ECA defines a child to mean a person who has not completed his/ her fourteenth year of age. The ECA states that no child shall be employed or permitted to work in any of the occupation set forth in the ECA (such as transport sector, railways, construction, and ports) or in any workshop wherein any of the processes defined in the Act are carried out.

1.1.9 The Protection Against Harassment of Women at the Workplace Act, 2010

In 2010, the Pakistan Government passed a Law called “Protection Against Harassment of Women at Workplace, Act 2010”. The Protection against harassment of Women at the Workplace Act 2010 provides legal protection to women against harassment at the workplace, and reforms the existing legislation regarding women’s right to work in Pakistan. It focuses on sexual harassment experienced at the workplace by employees and facilitates the transformation of the work environment, so that it is free of sexual harassment, intimidation, and abuse. The law makes it a special crime to use force against a woman, or even threaten to use force, if the intention is to “disturb her modesty”. It is an offence only when the accused

intended or knew it to be likely that the acts in question would lead to an outrage of the victim's modesty.

2 PROVINCIAL LABOR LAWS

In 2010, subjects of labor and employment were devolved to provinces under the 18th Amendment to the Constitution of Pakistan, as a result of which the federal labor laws became applicable on provinces under Article 270 AA (6) of the Constitution of Pakistan. The 18th Constitutional Amendment in Pakistan has altered the landscape of the labor administration system in the country. Provinces now have a greater responsibility and resources in terms of legislation and implementation. Each province has developed its own labor policy to protect worker's rights. The policy relevant to the N-5 project is the Sindh Labor Policy, 2018, Khyber Pakhtunkhwa Labor Policy 2018 and Punjab Labor Policy 2018. These Policies sets out the framework on industrial relations, social and economic wellbeing of the people of the province of Punjab, Sindh and Khyber Pakhtunkhwa.

After the Eighteenth Amendment, each province adopted various laws which comprised of labor laws, welfare and industrial relations laws, where the applicable labor laws are discussed below:

Sindh Province

1. The Sindh Workers Compensation Act 2015

This act outlines the details regarding compensation to be paid to workers in case of fatality, loss of hearing, eye sight, limbs during the conduct of work activities. It also outlines the Occupational diseases according to the nature of work and compensation to be paid to the workers in case it proved that the worker suffered from the disease due to workplace exposure.

2. The Sindh Minimum Wages Act 2015

The Sindh Minimum Wages Act 2015 outlines the details with respect to payment of minimum wages to workers of different categories as per gazette notification by the Government of Sindh. The minimum wages to be paid shall be reviewed periodically and minimum wages notified. Employers are bound to abide by the Minimum Wages Act and pay the wages as notified.

3. The Sindh Terms of Employment (Standing Orders) Act ,2015

The Act outlines the classification of workers into:

- i) permanent;
- ii) probationer;
- iii) badly;
- iv) temporary;
- v) apprentice;
- vi) contract worker.

The terms and conditions of employment shall be provided to the worker in writing, holidays and leave with pay shall be provided. Rules for termination of services are defined in the Act. The Act outlines special provision for construction workers employment and termination at the end of the Project.

4. The Sindh Payment of Wages Act 2015

The Payment of Wages Act 2015 outlines the responsible person for payment of wages and method of payment of wages to workers. Procedure for fines and deductions is defined. Penalties have been fixed on the employer for non-payment of wages or illegal deductions.

5. Sindh Bonded Labor (Abolition) Act 2015

The Act is gender sensitive; an anti-discrimination clause is added to each new proposed Law in accordance with ILO requirement viz: “No discrimination shall be made on the basis of sex, religion, political affiliation, sect, color, caste, creed, ethnic background in considering and disposing of issues relating to the enforcement of this Act”. In all proposed Laws the cognizance has been changed from that of the Judicial Magistrate to the Presiding Officer Labor Courts who is a Session Judge.

This act is applicable as the project may involve the numbers of staff/worker having different religion, political affiliation, sect, color, caste, creed, ethnic background.

6. The Sindh Prohibition of Employment of Children Act 2017

The Sindh Prohibition of Employment Act 2017 provides definitions for child and adolescent. A child is a person who is below fourteen years of age and an adolescent is a person who is over fourteen years of age and below eighteen years of age.

The Act outlines that no child labor shall be employed and no adolescent shall be employed to conduct hazardous work as defined in the Schedule.

The Act has fixed penalties in case of employment of child labor. All other labor laws are applicable in case of employment of children.

7. The Sindh Occupational Health & Safety Act, 2017

The Act makes provisions for occupational safety and health conditions at all workplaces in the province for the protection of workers during work. Under the Act, an Occupational Safety and Health Council will be established in Sindh with secretary of Sindh government’s Labor and Human Resources Department as its chairperson. The act applies in any Project situation where worker’s rights and protections are enforced. This law is applicable to construction and Project workers and will be complied during construction and operation phases.

8. The Protection against Harassment of Women at the Workplace (Amendment) Act 2022

The Protection against Harassment of Women at the Workplace Act, 2022 introduced amendments in the previous Act of 2010, and has further broadened its scope. The Act defines harassment as (a) “any unwelcome sexual advance, request for sexual favors, stalking or cyber stalking, or other verbal, visual or written communication or physical conduct of a sexual nature, or sexually demeaning attitudes, including any gestures or expression conveying derogatory connotation causing interference with work performance or creating an intimidating, hostile or offensive work environment, or the attempt to punish the complainant for refusal to comply to such a request or is made a condition for employment”; and (b) “discrimination on the basis of gender which may or may not be sexual in nature, but which may embody discriminatory and pre-

judicial mind-set or notion, resulting in discriminatory behavior on basis of gender against the complainant”.

9. The Sindh Differently Abled Persons (Employment, Rehabilitation, and Welfare) Act, 2017

The Act provides for the employment, rehabilitation, and welfare of differently able persons. The definition of "differently able" is any persons who on account of injury, disease, or congenital deformity, is challenged for undertaking any gainful profession or employment in order to earn his livelihood and includes a person who is blind, deaf, physically challenged or mentally challenged.

This act is applicable as the Project will involve serious occupation health and safety issues during construction phase and may cause serious injury to worker/staff causing permanent disability and differently able

Punjab Province

1. The Punjab Workmen's Compensation (Amendment) Act, 2013

This act is the amendment of the original Workmen's Compensation Act, 1923 to provide enhanced compensation and protection for workers injured in the course of their employment in Punjab. It increases the compensation amounts for injured workers or their families, broadens the scope to cover more categories of workers and workplaces, and strengthens the employer's liability for workplace safety. The amendment also incorporates the provincial autonomy by replacing "Pakistan" with "Punjab" in the text, reflecting the devolution of powers under the 18th Amendment. Additionally, the Act includes procedural updates to streamline the claims process, ensuring timely and efficient compensation for workers.

2. Factories Act, 1934

This act establishes standards for working hours, leave, cleanliness, ventilation, and ensures the provision of adequate facilities to protect workers' well-being while on the job. This act is applicable as the Project will involve various type of workers and the safety of the workers will be given due consideration during the implementation of the N-5.

3. Punjab Minimum Wages Act, 2019

This act establishes the minimum wage for workers in the province, ensuring fair compensation for labor. It mandates employers to pay workers at least the prescribed minimum wage, which is periodically reviewed and adjusted by the government. The Act aims to protect workers, particularly those in unskilled and low-wage jobs, from exploitation and ensures a basic standard of living through guaranteed wages. This act is the applicable to the Project as Employers are bound to abide by the Minimum Wages Act and pay the wages as notified.

4. Punjab Employees' Social Security Ordinance, 1965

The ordinance provides social security benefits to industrial workers in the province of Punjab. It ensures that workers and their families have access to medical care, financial support in case of injury or illness, and other social welfare benefits. The Ordinance establishes a system for workers to contribute to a social security fund,

which is then used to provide financial assistance for healthcare, disability, and pensions, thereby safeguarding workers' well-being and economic stability. This ordinance is applicable to the Project as the workers safety and wellbeing will be given due consideration in the implementation stage of the N-5.

5. Punjab Workers Welfare Fund Act, 2019

This act aims to provide welfare benefits to workers in the province of Punjab. The Act establishes a fund that is used to support workers through various welfare measures, including the provision of housing, education, healthcare, and financial assistance. It ensures that workers receive benefits that improve their quality of life and provide support during times of need, such as illness, injury, or retirement. The fund is financed through contributions from employers, creating a safety net for the workforce in the province.

6. Punjab Occupational Health and Safety Act, 2019

It ensures the health and safety of workers across the province. The Act mandates employers to provide a safe working environment by implementing safety protocols, hazard controls, and health measures to prevent accidents, injuries, and occupational diseases. It establishes requirements for the provision of protective equipment, training, and emergency procedures, while also setting guidelines for workplace inspections and the enforcement of safety standards, aiming to reduce workplace risks and protect workers' well-being. This act is applicable as the Project may involve various occupational health and safety issues related to workers.

7. Punjab Domestic Workers Act, 2019

This act provides legal protections for domestic workers in the province, ensuring their rights and welfare. The Act regulates working conditions for domestic workers, including fair wages, working hours, and provisions for rest and leave. It aims to prevent exploitation and abuse by establishing a formal relationship between employers and workers, requiring contracts and setting minimum standards for their treatment. The law also includes measures for the social security and health care of domestic workers, promoting their dignity and ensuring better living and working conditions. This act is applicable as the Project may involve workplace harassment and abuse issues.

8. Punjab Restriction on Employment of Children Act, 2016

This act prohibits the employment of children in hazardous occupations to protect their rights and well-being. The Act aims to eliminate child labor and ensures that children are not subjected to work that may harm their physical, mental, or emotional development. It aligns with international conventions on child labor and mandates strict penalties for violations. The law encourages the education and welfare of children, ensuring they are not deprived of their childhood or education for the sake of labor. This act is applicable as the Project may involve child labor issues.

9. Punjab Protection of Women against Violence Act, 2016

This act aims at protecting women from various forms of violence, including physical, emotional, psychological, and economic abuse. The Act provides women with legal recourse and protection through measures such as the establishment of protection

centers, shelters, and a legal framework for obtaining protective orders. It defines various types of violence and outlines procedures for filing complaints, providing assistance, and ensuring the safety of women. The act also imposes penalties on perpetrators and aims to create a safer environment for women in the province. This act is applicable as the Project may involve gender based violence and sexual harassment issue.

10. Punjab Maternity Benefit Ordinance, 1958

The ordinance ensures that female workers are provided with maternity leave and financial support during childbirth. The Ordinance mandates that female employees are entitled to 12 weeks of paid maternity leave, with at least six weeks to be taken after the childbirth. It also ensures that women are not discriminated against or dismissed from their jobs due to pregnancy or maternity leave. It requires employers to provide financial assistance to female workers during this period, safeguarding their rights and well-being during maternity while encouraging their return to work afterward. This ordinance is applicable as the Project may involve female staff.

Khyber Pakhtunkhwa Province

1. Khyber Pakhtunkhwa Workers' Compensation Act, 2013

This act provides a legal framework for compensating workers who are injured, disabled, or killed while performing their duties at work in the province. It holds employers responsible for compensating workers for medical expenses, lost wages, and permanent disabilities resulting from workplace accidents. The compensation amount is based on the severity of the injury and the worker's wages. This act aims to protect workers' rights by providing financial support and welfare benefits during work-related injuries or incapacity.

2. Khyber Pakhtunkhwa Factories Act, 2013

This law ensures the health, safety, and welfare of workers across the province. It sets standards for workplace conditions, including adequate ventilation, lighting, sanitation, and medical facilities, to create a safe working environment. The Act regulates working hours, overtime, rest periods, and mandates regular health checks to prevent occupational diseases. It also requires the provision of safety equipment and emergency exits to reduce accidents. Through inspections and penalties for non-compliance, the Act ensures that employers uphold these standards to protect workers' well-being. This act is applicable as the Project involves various types of workers.

3. Khyber Pakhtunkhwa Minimum Wages Act, 2013

It establishes the legal framework for setting and ensuring minimum wage levels for workers in the province. The Act mandates that employers must pay their workers at least the minimum wage determined by the provincial government, which is periodically reviewed and updated. It covers various categories of workers, ensuring that those in low-skilled and unskilled jobs receive fair compensation for their labor. The Act aims to protect workers from exploitation by preventing employers from paying wages that are below the established minimum. It also includes provisions for penalties against employers who fail to comply with the wage requirements, ensuring that

workers earn a living wage to support their basic needs. This act is the applicable to the Project as Employers are bound to abide by the Minimum Wages Act and pay the wages as notified.

4. Khyber Pakhtunkhwa Workers Welfare Fund Act, 2013

It establishes a fund aimed at improving the welfare of industrial workers in the province. The Act mandates the creation of a fund that is financed through contributions from employers and government allocations. The funds are used to provide welfare benefits to workers, including financial assistance for housing, education, healthcare, and other social security measures. The Act is designed to enhance the well-being of workers by providing essential services and support during times of need, such as illness, injury, or retirement. It ensures that workers have access to basic welfare services, improving their quality of life and promoting a more secure and stable workforce. The fund is financed through contributions from employers, creating a safety net for the workforce in the province.

5. Khyber Pakhtunkhwa Employees' Social Security Ordinance, 1965

It provides social security benefits to industrial workers in the province. The ordinance requires employers to register their employees with the Social Security Institution and make regular contributions to a social security fund. This fund is used to provide workers with financial support and healthcare services in the event of sickness, injury, disability, or retirement. The Ordinance ensures that workers and their families have access to medical treatment, disability benefits, and pensions, thereby providing a safety net for workers in the event of unforeseen circumstances. It is aimed at improving the welfare of the workforce and reducing the economic hardships that workers may face due to work-related injuries or illness. This ordinance is applicable to the Project as the workers safety and wellbeing will be given due consideration in the implementation stage of the N-5.

6. The Khyber Pakhtunkhwa Prohibition of Employment of Children Act, 2015

This act aims to eliminate child labor in the province by prohibiting the employment of children under the age of 14 in any hazardous work or occupation. The law mandates that children must not be employed in work that could harm their physical, mental, or moral well-being. It establishes regulations for monitoring and enforcement, with penalties for violators. Additionally, it emphasizes the importance of education, ensuring that children are not deprived of their right to schooling. The Act aligns with international conventions on child rights and aims to protect children from exploitation and ensure their proper development. This act is applicable as the Project may involve child labour.

7. Khyber Pakhtunkhwa Commission on the Status of Women Act, 2016

The Act mandates the creation of a dedicated body tasked with addressing issues related to women's rights, social welfare, and overall status in society. The commission is responsible for formulating policies, ensuring the implementation of laws that protect women's rights, and advocating for women's participation in decision-making processes. It also focuses on addressing gender-based violence, discrimination, and other barriers to women's full participation in economic, political, and social life. The Act aims to create a more supportive and equitable environment for women in Khyber

Pakhtunkhwa. The act is applicable to the Project as the Project may involve female staff.

8. Protection Against Harassment of Women at the Workplace Act, 2020

This Act defines workplace harassment as any unwelcome behavior, comments, or actions that create a hostile or intimidating work environment for women. It establishes clear procedures for filing complaints and seeking redress, ensuring that victims of harassment have access to support and legal recourse. Employers are required to create an internal committee to investigate complaints, and they must take preventive measures to ensure a safe and respectful work environment. The Act also sets out penalties for employers who fail to comply with its provisions, emphasizing the importance of providing women with a harassment-free workplace. This act is applicable as the Project may involve gender based violence and sexual harassment issue.

9. Khyber Pakhtunkhwa Child Protection and Welfare Act, 2010

This Act establishes a legal framework for the care, protection, rehabilitation, and welfare of children at risk, particularly those who are vulnerable due to poverty, abuse, or abandonment. It provides for the creation of a Child Protection and Welfare Commission, which is responsible for overseeing child protection efforts and coordinating with other agencies to safeguard children's rights. The Act also lays out procedures for the removal of children from harmful situations and their placement in protective care. It ensures children's access to education, healthcare, and rehabilitation services, aiming to provide a safe and supportive environment for their growth and development. Additionally, the Act strengthens the legal process to prevent child labor and child trafficking, reinforcing the provincial commitment to upholding the rights and welfare of children. This act is applicable as the Project may involve child labor issues.

10. Khyber Pakhtunkhwa Prohibition of Employment of Children Act, 2015

The Act mandates that children must not work in environments that could harm their physical or mental well-being and establishes penalties for employers who violate these provisions. The law aligns with international conventions on child labor, aiming to protect children's rights and provide them with opportunities for education and growth rather than exploitation in the workforce. This act is applicable as the Project may involve child labor issues.

3 BRIEF OVERVIEW OF LABOR LEGISLATION: OCCUPATIONAL HEALTH AND SAFETY

3.1 INTERNATIONAL CONVENTIONS

3.1.1 ILO Conventions

ILO has formulated more than forty regulations, particularly concerning with the OHS issues. It has several major regulations as follows:

ILO Technical Convention: C187 – Promotional Framework for Occupational Safety and Health Convention.

This Convention stresses:

- i. A safe and healthy working environment by formulating a national policy
- ii. Each member shall promote and advance, at all relevant levels, the right of workers to a safe and healthy working environment
- iii. In formulating its national policy, each Member, in light of national conditions and practice in consultation with the most representative organizations of employers and workers, shall promote basic principles such as assessing occupational risks or hazards; combatting occupational risks or hazards at source; and developing a national preventative safety and health culture that includes information, consultation and training.

Prevention of Major Industrial Accidents Convention, 1993 (No. 174)

The purpose of this convention is the prevention of major accidents involving hazardous substances and the limitation of the consequences of such accidents. The convention protects workers, the public, and the environment by preventing major accidents either on or off site and provides guidance on appropriate emergency planning.

Safety and Health in Construction (1992)

The objective of this code is to provide practical guidance on a legal, administrative, technical and educational framework for safety and health in construction with a view to: preventing accidents and diseases and harmful effects on the health of workers arising from employment in construction: ensuring appropriate design and implementation of construction projects: providing means of analyzing from the point of view of safety, health and working conditions, construction processes, activities, technologies and operations, and of taking appropriate measures of planning, control and enforcement.

Safety and Health in Building and Civil Engineering Works (1972)

Code of practice relating to occupational safety and occupational health in civil engineering and the construction industry, includes provisions concerning the work environment and equipment, fire protection, noise, machinery (including building machinery and electrical machinery, ionizing radiations, explosives, handling, occupational health, welfare, and healthcare services).

This code of practice covers 42 topics related to safety and health in building and civil engineering. The Main topics include workplaces and equipment, scaffolds, ladders and stairs, lifting appliances; railways, road and similar transport; construction equipment; electricity, blasting, concrete work, other building operations, excavations, underground construction, work in compressed atmosphere, work clothes, and personal protective equipment; hygiene and welfare; medical supervision.

3.1.2 United Nations and Group 20 Countries

The United Nations has adopted 17 Sustainable Development Goals with specific target on OSH. Similarly, the G20 summit placed OSH on the agenda.

3.2 LOCAL LEGISLATION ON OHS

Pakistan Occupational Health & Safety Act 2018, Punjab Occupational Health and Safety Act, 2019, Sindh Occupational Safety and Health Act 2017 (Amended 2019) and Khyber Pakhtunkhwa Occupational Safety and Health Act, 2022 are the applicable local legislation as this Act applies to all Workplaces. Details of these acts are described below:

Duties of the employer:

1. Undertake practical measures for Safety & Health and Welfare;
2. Identify, assess and address existing & new hazards;
3. Report and investigate incidents;
4. Provide and apply Safe Systems of Work, Safe tools & equipment & appliances
5. Safe use, handling, storage, disposal and transport of materials and substances;
6. Control physical, chemical, biological, ergonomic, psychosocial or other hazards, affecting workers and others;
7. Provide Information, Instruction and Training to ensure Safety & Health at Work;
8. Maintain workplace in safe, clean, orderly and risk-free condition with safe means of access;
9. Inform workers regarding work hazards, risks involved and preventive and protective measures;
10. Provide adequate PPE to prevent risk from injury and ill health;
11. Maintain records of all accidents at workplace;
12. Provide first aid arrangements and emergency provisions;
13. Take measures to prevent fires & measures in the event of fire; and
14. Collaborate in the case of simultaneous operations or joint premises

Duties of workers and volunteers:

1. Ensure safety & health of others who may be affected by his acts & omissions & not willfully do anything to endanger himself or others;
2. Use & take care of PPE provided by the employer;
3. Do not willfully interfere or misuse any appliance or equipment or convenience provided for safety & health of persons at workplace;
4. Resolve any situation being unsafe posing immediate threat with the employer or cease work until the dispute is resolved
5. Until the dispute is resolved, employer may assign the affected workers some temporary alternative work; and
6. Worker shall report any occupational accident, occupational Disease, dangerous occurrences, or commuting accident as per company OSH Policy.

Duties of suppliers:

1. Design & construction to be safe & without risk to safety & health;
2. Testing & examination;
3. Adequate information;
4. substance to be safe & without risk; and

5. Includes supply, handling, assembling, installing, erecting & testing of tools, machinery & equipment

These local laws states rules that that Government has made for the safety and health of workers in any establishment by notification in official gazette.

The rules include the following matters:

1. Cleanliness and maintenance of building;
2. Illumination, ventilation, temperature, noise, dust, fumes and artificial ventilation;
3. Disposal of wastes and effluents;
4. Floors, stairs, mean of access, proper working space, overcrowding, pits, sumps, opening in floors, and allied things;
5. Drinking water and conservancy;
6. Guarding and fencing of machinery at work and work at, on or near moving machinery;
7. Self-acting machines and device for cutting off power; revolving machinery and pressure plants;
8. Instruction, training and supervision in relation to employment on dangerous machines and fencing or casing of machinery, wet floors, open wiring, safety fitting etc.;
9. Explosives or inflammable dust, gas and precautions against dangerous fumes etc.;
10. Precaution in case of fire;
11. Personal protective equipment;
12. Excessive weights;
13. Loading and earth moving machinery;
14. Cranes, hoists, lifts and other lifting operations;
15. Scaffolding and work at heights; and
16. Safety of building, machinery and manufacturing process

Whereas, these Local Occupational Health & Safety Acts calls for:

1. Written Statement of Policy;
2. Consultation – formation of OHS Committee with worker representation; appointment of OHS officer;
3. Training of Health & Safety Representative;
4. Precautions against Contagious & Infectious Disease at Workplace; and
5. Compulsory Vaccination and Inoculation

Enforcement measures:

- Registration of workplaces and approval of site, buildings and other constructions to be used as workplaces; and
- Notification and investigation of accidents, dangerous occurrences and occupational illnesses

These acts detail the formation of Occupational Health and Safety Council headed by the Secretary Labor having members from industry, representatives from employers, representatives of workers, professionals, members from civil society and member from the

Labor Directorate. These Acts has also fixed penalties and offences in case of non-compliance with the provisions of the Act.

The organizations need to formulate OHS Policy which is the requirement of the Act. The contractors and suppliers shall comply with the provisions of these Acts.

3.3 THE LABOR POLICY 2010 – GOVERNMENT OF PAKISTAN

The Labor Policy 2010 addresses the importance of OHS legislation in Pakistan as provided below:

- Labor laws relating to occupational health and safety will be consolidated and rationalized to avoid overlapping and inconsistencies
- Government shall enact suitable legislation to ensure health and safety of construction workers
- A Tripartite council on Health & Safety has been set up to identify health and safety hazards for workers of all economic sectors and to make recommendations for safety measures on a continuous basis.

ANNEXURE II – GUIDELINE FOR POLICIES AND PROCEDURES

A) EMERGENCY RESPONSE PLAN

1.0 PURPOSE

The purpose of this plan is to:

- 1.1 Provide guidelines for using internal and external resources to effectively and quickly respond to emergencies covered within the Scope of the Emergency Response Plan at the Project Site in order to:
 - Eliminate or minimize injuries to personnel.
 - Protect the Environment.
 - Prevent or minimize damage to Project site and equipment.
- 1.2 Ensure communication of all essential information to the appropriate personnel as quickly as possible.
- 1.3 Identify the responsibilities of site personnel when an emergency occurs.
- 1.4 Identify training required in order to ensure a high level of preparedness at all times.

2.0 SCOPE:

The Emergency Response Plan for NHA has been developed to respond to the following emergencies at the facility:

- Serious fire or explosion
- Bomb threat
- Medical Emergencies.
- Civil unrest
- Earthquake
- Heavy Rains and Floods

3.0 RESPONSIBILITY:

The Project Manager is responsible to establish, implement and maintain the procedure.

- 3.1 All persons designated in this document shall ensure the effective implementation of Emergency Response Plan

4.0 DEFINITIONS:

4.1 Emergency Response Plan

Emergency Response Plan outlines the steps, which should be followed to enable the Company to respond effectively to an emergency. It addresses:

- Emergency Team
- Emergency Notification and Communication Plans.
- Contingency Plans.
- Training Requirements.

4.2 Contingency Plan

A response plan specially developed for individual emergency scenario (e.g., fire, medical etc.) which is envisioned to occur. Contingency Plans complement an Emergency Response Plan and enable detailed provision to be made for each emergency envisioned.

4.3 Incident

An unplanned event that results in an injury, fire or explosion, a spill or leak, damage to property, personnel, general public or visitors.

4.4 **Emergency**

Emergency may be defined as a sudden event causing or has the potential to cause serious human injury and/or damage to the company assets and/or environmental degradation of large magnitude.

4.5 **Level 1 Emergency**

An emergency that can be controlled or handled by Internal Resources and concerned personnel and **DOES NOT** require the assistance of the local emergency services.

4.6 **Level 2 Emergency**

This is an emergency that requires assistance from the local emergency services, e.g. KMC. Level 2 emergencies can result from a natural disaster, large fire or a spill.

4.7 **Incident Commander**

The Incident Commander is the person responsible for the overall management of the emergency.

4.8 **Visitor**

For the purposes of this plan, a Visitor is anyone within the site boundaries who is not an employee. This includes suppliers, vendors etc.

5.0 ORGANIZATION:

Organogram of Emergency Response for NHA is shown in Annexure II.

5.1 **Incident Commander**

Purpose:

To handle and control the Emergency Situation using best available resources

Functions:

- He is overall in-charge of any incident/accident at the Project Site and will communicate any incident to the Project Director.

5.2 **Fire Fighting Team**

Purpose:

To control fires, smoke and explosion during an emergency

Functions:

- Extinguish the fire.
- Control Smoke and Explosion.
- Cordon off affected area and restrict entry of non-concerned people.
- Carry out Rescue and Evacuation of trapped personnel.

5.3 **First Aid Team**

Purpose:

To provide Medical Attention to Injured Personnel

Functions:

- To provide medical care to injured personnel
- To send the injured personnel to the clinic or hospital as appropriate.
- To accompany the injured personnel to the hospital, as directed by Incident Commander

6.0 COMMUNICATION RESPONSIBILITIES:

- 6.1 For a Level 1 emergency Incident Commander shall contact the emergency services in the area like the Fire Brigade.
- 6.2 For a Level 1 emergency, which involves a medical emergency, the Incident Commander shall call ambulance service and advise them of the nature of the emergency during the phone call.
- 6.3 For both Levels of Emergency, Incident Commander shall inform the Project Director immediately.

7.0 EVACUATION:

- 7.1 Upon hearing the fire alarm, visitors and staff who have not been assigned a responsibility in the Emergency Response Plan shall be asked to go to the designated Assembly Point
- 7.2 Once assembled, the Incident Commander shall perform a head count in order to confirm the presence or absence of the employees at the Project site.
- 7.3 In case anyone is missing, Incident Commander shall call on their mobile to check where they are located.
- 7.4 Personnel may return to their work places after the emergency is over

8.0 CONTINGENCY PLANS

- 8.1 **Purpose**
Contingency plans have been developed to provide guidelines for responding to incidents and emergencies that can occur within the facility. Since it is impossible to predict exact conditions during an actual emergency, they are to be used as guidelines for the response and modified as necessary.
- 8.2 The following Contingency Plans have been developed for NHA:
 - *Fire*
 - *Bomb threat*
 - *Earthquake*
 - *Medical Emergencies*
 - *Heavy Rains and Flooding*
 - *Civil Unrest*
- 8.3 The Incident Commander is authorized to activate the Contingency Plan for incidents at the office.
- 8.4 The Emergency Response Team working with led by the Incident commander is responsible for implementing the response defined within the Contingency Plan. It is recognized that the actual response may vary from the Contingency Plan.
- 8.5 The following general procedures should be considered when implementing an emergency response:
 - 8.5.1 Response should be developed in the following order of priority:
 - Rescue of injured or trapped personnel.
 - Protection of the environment.

- Protection of NHA assets

9.0 DEACTIVATION AND RECOVERY PLAN:

9.1 Deactivation of Emergency Response Plan

- The Incident Commander is responsible for deactivating the emergency response plan at the end of the emergency.
- He shall make this decision after consulting with the Director and other members of the emergency response teams, as appropriate.
- He will then notify all that the emergency has ended.
- The emergency area will be barricaded to prevent entry by unauthorized personnel.

9.2 Following general actions should be taken by the respective Teams at the conclusion of the emergency:

- Emergencies Involving Fires
- Arrange for firefighting equipment used during the emergency to be refilled before returning them to their correct location.
- Clean the fire area, after receiving authorization from the Incident Investigation Team Leader.
- Submit Incident Report to Incident Commander with copy to Project Director.

10.0 INCIDENT INVESTIGATION:

10.1 As per the legal requirements, the incident investigation team will investigate all incidents and emergencies, and to develop recommendations to prevent recurrence. The incident reporting format is provided with this Annexure for the guideline of team.

10.2 The Incident Commander shall ensure that the following items of evidence are preserved for use by the investigation team:

- Notes taken about the emergency response by Emergency Response Teams.
- Statements taken immediately after the incident from witnesses to the emergency.
- Within 24 hours of the emergency, Emergency Response Team will investigate the root cause of the accident; identify opportunities to improve. Moreover, suggest any suitable changes in the contingency plan or procedure in light of the evaluation of the incident.

11.0 TRAINING:

11.1 All concerned shall receive initial as well as periodic refresher training in addition to mock drills order to allow them to fulfill their responsibilities during an emergency.

11.2 Training needs be identified and team members should be trained to handle any situation. The training log shall be maintained and regular training in house as well as outside shall be arranged.

11.3 Incident Commander is responsible for ensuring that personnel receive the required training before they are expected to perform their duties, and that they also receive the refresher training at the required interval.

12.0 CONTINGENCY PLAN FOR FIRE:

- 12.1 When the fire alarm sounds evacuate the affected area and gather at the assembly point
- 12.2 Incident Commander will make sure that no employee is left behind at the affected place.
- 12.3 Fire officer will shut off sources of ignition & electricity.
- 12.4 Incident Commander will contact the Security In Charge to notify the Fire Brigade, if required.
- 12.5 The Emergency Response Team will use appropriate firefighting equipment to extinguish the fire; such as:
 - For all solids except metals, use Water Type Fire Extinguisher.
 - For those articles having Electricity/ Power, use Carbon Dioxide Fire Extinguisher.
- 12.6 Prepare and submit an Incident Report.

13.0 CONTINGENCY PLAN FOR EARTHQUAKE

- 13.1 Evacuate and assemble at the assembly point
- 13.2 Provide first aid in case anyone has been injured by falling materials
- 13.3 Alert emergency services and call for ambulance in case there are many injuries
- 13.4 Ensure that all personnel working at the site especially working on heights have left their places of work
- 13.5 Shut off the electricity and fuel and water connections.
- 13.6 Remain at the assembly point till the earthquake tremors cease.
- 13.7 The site shall be inspected for damage and list prepared of damaged structures and equipment

14.0 CONTINGENCY PLAN FOR BOMB THREATS:

- 14.1 Bomb threat may be received at the Project office via telephone call
- 14.2 The person receiving the call must remain calm and try to extract as much information as possible from the caller regarding the place where the bomb is placed, the size of the bomb etc.
- 14.3 Immediately inform the Incident Commander and arrange for evacuation of personnel from the area(s)
- 14.4 Contact Bomb Disposal Squad for taking necessary action to locate the bomb
- 14.5 All personnel to return to work when the Bomb Disposal Squad clears the area.

15.0 CONTINGENCY PLAN FOR MEDICAL EMERGENCIES:

- 15.1 Any employee injured during work or due to an emergency is to be treated by first aid team and provided first aid till the arrival of ambulance.
- 15.2 In case, the injury is severe, then the person shall be sent to the nearest hospital for further treatment.
- 15.3 Incident Commander shall be notified of medical emergency at once.

16.0 CONTINGENCY PLAN FOR HEAVY RAINS AND FLOODING

- 16.1 If rains have started during the night the security in charge must inform the Project Engineer and wait for further orders
- 16.2 Steps must be taken to cover all the equipment at the Project site and remove them to a safe place.
- 16.3 In case rains continue then work is not to proceed till the rains stop
- 16.4 In case of flooding at the site, all equipment is to be removed from the flooded area and kept covered
- 16.5 After the rains have stopped, assessment of damages is to be carried out and report prepared by the Incident Commander and submitted to the Project Director.

17.0 CONTINGENCY PLAN FOR CIVIL UNREST

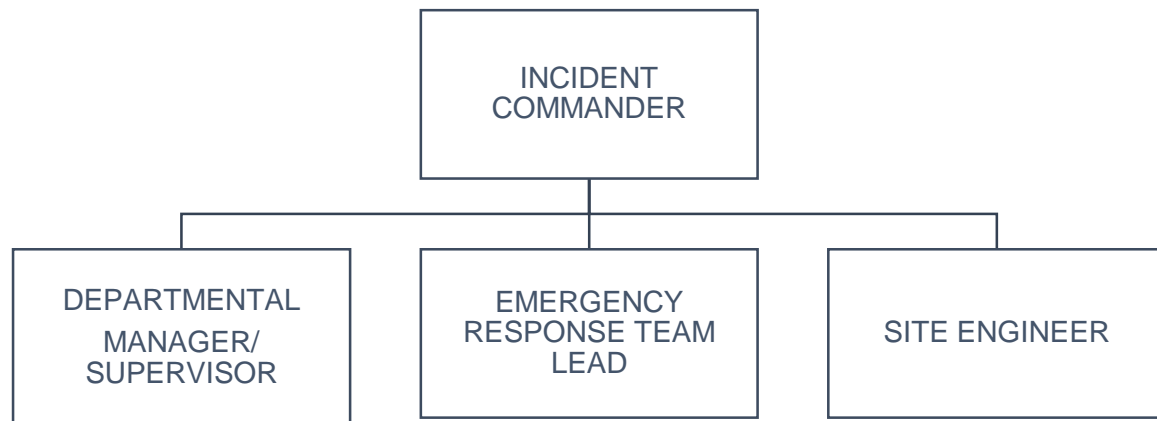
- 17.1 In case there is news of civil unrest, the Security In Charge shall ensure that all gates of the Project Site(s) are closed and secured. Rangers/Police shall be summoned.
- 17.2 No employee shall be allowed out from the site.
- 17.3 When it is ensured that there is no danger of any violent demonstrations in the vicinity of the Project site, the gates may be opened and traffic in and out allowed.

Emergency Contact Numbers

Nationwide Emergency Helpline	
Pakistan Emergency Helpline (PEHL)	911
National Highways and Motorway Police	130
Punjab	
Police Emergency	15
Rescue Services (Ambulance and Fire)	1122
Edhi Ambulance Service	115
Chhipa Ambulance Service	1020
Fire Brigade	16
Punjab Highway Patrol	1124
IGP Complaint Helpline	1787
Counter Terrorism Department (CTD)	0800-111-11
Sindh	
Police Emergency	15
Rescue Services (Ambulance and Fire)	1122
Edhi Ambulance Service	115
Chhipa Ambulance Service	1020
Aman Ambulance Service	16
Fire Brigade	16
Rangers Helpline	1101
Citizens-Police Liaison Committee (CPLC)	1102
Khyber Pakhtunkhwa (KP)	
Police Emergency	15
Rescue Services (Ambulance and Fire)	1122
Edhi Ambulance Service	091-2214575
Fire Brigade	091-2566666

Chief Minister Complaint Cell	091-9222460
Police Complaint Cell	8855
Traffic Police Complaint Cell:	8333
Islamabad Capital Territory	
Police Emergency	15
Rescue Services (Ambulance and Fire)	1122
Edhi Ambulance Service	115
Chhipa Ambulance Service	1020
Aman Ambulance Service	1021
Fire Brigade	16
IGP Complaint Number	1715
PIMS Hospital	051-9261170

ORGANOGRAM FOR EMERGENCY RESPONSE



INCIDENT REPORTING FORMAT

Incident Location		Date of Incident	
Time of Incident		Incident No.	
License Category (Tick mark which is applicable)	Generation <input type="checkbox"/>	Transmission <input type="checkbox"/>	Distribution <input type="checkbox"/>
Incident Category (Tick mark which is applicable)	Employee <input type="checkbox"/>	Contractor <input type="checkbox"/>	General Public <input type="checkbox"/>
	Environmental Violation <input type="checkbox"/>	Occupational Health Violation <input type="checkbox"/>	Outage of Equipment or Machinery <input type="checkbox"/>

Incident Type	Fatality <input type="checkbox"/>	Public Injury <input type="checkbox"/>	Public Illness <input type="checkbox"/>
	Lost Time <input type="checkbox"/>	Restricted Duty <input type="checkbox"/>	Medical Treatment <input type="checkbox"/>
	First Aid <input type="checkbox"/>	Fire <input type="checkbox"/>	Release/Spilled <input type="checkbox"/>
	Crane / Heavy Equipment <input type="checkbox"/>		Property Damage <input type="checkbox"/>
Total Victims (s)			
Name of Victim-1		CNIC No.	
Gender		Age	
Father's Name		Occupation of Victim	
Victim Relative Contact No.		Extent of Injury	
Name of Victim-2		CNIC No.	
Gender		Age	
Father's Name		Occupation of Victim	
Victim Relative Contact No.		Extent of Injury	
Witness-1 Name		Witness-1 Contact No	
Witness-2 Name		Witness-2 Contact No	
Witness-3 Name		Witness-3 Contact No	

Which PPE used by victim(s) at the time of incident:

Incident Description. (Write down how incident happened, beginning with the normal job activity that led to the incident. Put the events with timing, as far as possible, in the order they happened)

Action Taken		Yes	No
Is the local police informed/FIR lodged?			
Is necessary evidence immediately gathered from the incident site for Licensee investigation process?			
Is an Investigation team formed by Licensee to determine root cause?			
Responsibility is fixed upon (with justification).			
What corrective actions are implemented immediately at incident site?			
What preventive actions are implemented immediately at other sites to avoid reoccurrence of similar incident?			
Is the incident reported within 24 Hours? (Yes/No). If No, provide justification.			
Role	Name	Mobile Number	Signature
Prepared by (Licensee Representative)			

B) Personal Protective Equipment

1. PURPOSE

The purpose of this procedure is to ensure that Personal Protective Equipment (PPE's) are made available to all project site employees.

The key requirements of this procedure include:

- Identification of areas / tasks requiring PPE's
- Selection and issuance
- Use and maintenance
- Eye protection policy
- Foot protection policy
- Training
- Program evaluation

2. SCOPE

This procedure applies to NHA Project Sites, where risks to health and safety cannot be adequately controlled through engineering and administrative means

3. RESPONSIBILITIES

The Project Manager in co-ordination with Site Labor and OHS Representative will:

- Co-ordinate the overall Personal Protective Equipment program at the Project Site
- Prepare and update the PPE procedure

The concerned Department Manager / Supervisor will:

- Generate list of PPEs used in his area
- Ensure that PPE is worn correctly
- Ensure that PPE is stored as per procedure
- Ensure that the correct cleaning procedures are conducted
- Inspect PPE at regular intervals
- Initiate disciplinary action if appropriate
- Ensure appropriate warning signs are posted for hazardous activities at the Project site
- Maintain inventory of PPEs of his area
- Organise PPE training

4. PROCEDURE

4.1 Identification of Area / Task Requiring PPE

The concerned Department Manager in co-ordination with Manager EHS / his representative will:

- Identify areas / tasks / processes for which PPE is required
- Ensure that PPE is used as last resort after all other feasible controls have been applied or as an interim measure until more effective controls can be implemented

4.2 Selection and Issue

The Project Manager in co-ordination with Site Labor and OHS Representative will:

- Select appropriate PPE's as per requirement
- Ensure that only the correct PPE is issued
- Ensure that PPE is issued to personnel who know its use
- Ensure that areas where PPE's use is mandatory are demarcated as "PPE Zone" outside the area
- Ensure that signs are placed in appropriate locations to warn staff where PPEs are required

4.3 Mandatory PPE for Project Site

Helmets and Safety Shoes are to be worn at all times at the Project Site. The helmets and Safety Shoes must be checked on regular basis by the Site Supervisor to ensure they are in good condition.

Other PPEs for construction sites are:

Harness, Welding Shields/Goggles, Gloves, Gum Boots, Respiratory Protective Equipment etc. These are to be worn when performing work at heights, welding activities working in wet areas.

4.4 Use and Maintenance

The Project Supervisor in coordination with the Site Labor and OHS Representative will:

- Develop procedures on correct use, storage and maintenance of PPE's
- Ensure that staff require to wear PPE's must be trained on their use
- Ensure that the correct PPE has been issued to the site personnel performing tasks for which it is required and keep a record of the PPE issued to the employees.
- Ensure that the issued PPE is worn correctly
- Ensure that the PPE is thoroughly cleaned and maintained
- Arrange regular inspections of PPEs at appropriate intervals
- Initiate disciplinary action against any person refusing to use issued PPE correctly

4.5 Training

The concerned Project Manager in co-ordination with Site Labor and OHS Representative will ensure that concerned personnel receive appropriate training as per EHS training program on:

- How and why PPE was selected
- When PPE is necessary
- Which PPE is necessary
- How to put on, take off, adjust and wear the PPE properly
- The proper-care, maintenance, storage, inspection, use, replacement and disposal of the PPE

The Project Manager will retain the PPE training record with a copy to Manager EHS / his representative

C) OPERATION OF HEAVY EQUIPMENT AND CRANES

1. PURPOSE

The purpose of this procedure is to ensure safety in operation of heavy equipment and overhead cranes.

2. SCOPE

This procedure defines the necessary precautions to be taken for operation of heavy equipment and overhead cranes

3. RESPONSIBILITIES

The Engineering Manager/Site Supervisor will ensure implementation of this procedure,

4. PROCEDURE

4.1 Operation of Heavy Equipment

- a) All heavy equipment at site is to be checked and certificate of safety is provided by an approved testing company
- b) Vehicular emissions from the equipment are to be evaluated by an approved testing laboratory to ensure that they comply with the Vehicular Emissions Standards
- c) The operators of the equipment are to be duly trained and have appropriate license to operate the equipment
- d) The area where the equipment is in operation is to be kept clear and no unauthorized personnel allowed to work around that area.
- e) All the safety alarms, lights etc. are to be in working condition at all times.
- f) Faulty equipment is to be removed from service and tagged that it is not to be used.
- g) All equipment is to be regularly checked and maintained.

4.2 Operation of Cranes

- a) The Project Engineer must ensure that crane operators are trained and hold a valid license to operate the crane
- b) All lifting equipment shall be checked daily to verify equipment is in safe operating condition before using. This check would include brakes, lights, horns, visibility from operator's station, and proper operation of power source for lifting. More detailed inspection of lifting equipment shall be conducted at regular intervals to maintain the

equipment in a safe, operable condition. Records of conditions found, and repairs made during inspections shall be maintained.

- c) Statutory requirements for annual inspections of lifting equipment shall be observed and records maintained.
- d) Safe working load chart shall be available at site and complied when lifting the loads
- e) No person shall be allowed to ride on the hook of any lifting equipment.
- f) Designated signalman shall be assigned and operation stopped in case operator is unsure of a signal or existence of a hazardous condition.
- g) Area around the crane operation shall be cordoned off and no unauthorised person allowed to work in the area.

D) STORAGE OF FUEL AND OTHER HAZARDOUS SUBSTANCES

1. PURPOSE

The purpose of this procedure is to provide a guideline for storage of fuel and other hazardous substances

2. SCOPE

This procedure defines the necessary precautions to be taken for fuel storage and storage of other hazardous substances

3. RESPONSIBILITIES

The Engineering Manager/Site Supervisor will ensure implementation of this procedure,

4. PROCEDURE

4.1 Storage of fuel

- a) All fuel for use in generators is to be stored in aboveground tanks and provided with bunding. The NFPA 30 guidelines are to be followed.
- b) Appropriate firefighting measures are to be taken in the area where the fuel tank(s) are located.
- c) If more than five thousand Litres of fuel is stored at site, then a license from the explosives department is to be obtained.
- d) "FLAMMABLE" "NO SMOKING" signs to be displayed in the fuel storage area

4.2 Storage of Hazardous Substances

- a) All hazardous/flammable materials are to be stored a segregated area and provided with secondary containment.
- b) Thinner should be stored on separate pallets with secondary containment.
- c) Appropriate fire extinguishers are to be placed in the area

4.3 Inspection of Storage Areas

The Site Labor and OHS Representative shall conduct regular inspections of the fuel storage areas and hazardous materials storage areas

E) PLAN FOR WASTE MANAGEMENT

Purpose

The purpose of this procedure is to ensure proper disposal of waste from activities conducted by or overseen by project site. In addition, this procedure outlines how to prevent discharges from dumping sites at the facility and other locations on grounds, which could cause pollutants to enter sensitive areas.

Scope

These procedures are to ensure the proper handling and legal disposal of all waste from all locations of the Project site. This program is an aide to summarize the applicable requirements of many different waste types and regulations but should not be considered all-inclusive of every waste regulation. As new regulations are promulgated and/or other facets of waste become part of this program, updates will be made.

Roles and Responsibility

- Contractors should include stormwater pollution prevention strategies in waste management procedures.
- It should be ensured that contractors implement proper Best Management Practices (BMPs) to prevent stormwater pollution.

Procedures

- All waste receptacles should be leak-tight with tight-fitting lids or covers. Plastic liners can be used to ensure leak tightness.
- Keep lids on dumpsters closed at all times unless adding or removing material.
- Place waste receptacles indoors or under a roof or overhang whenever possible.
- Locate dumpsters on a flat, paved surface and, if possible, install berms or curbs around the storage area to prevent run-on and run-off.
- NHA up around outdoor waste containers regularly.
- Arrange for wastes to be picked up regularly and disposed of at approved disposal facilities.
- Record relevant EPA approved waste disposal contractor's contact details.
- Never place hazardous materials, liquids or liquid-containing wastes in a dumpster or trash receptacle. If liquid wastes must be disposed in the trash, absorb them with kitty litter or other absorbents before disposal.
- Non-hazardous liquid waste must be disposed in the sanitary sewer (if approved) or transported to a disposal site that will accept that type of wastewater.
- Do not wash out waste containers or dumpsters outdoors unless the wastewater drains to sanitary sewer or wash containers/dumpsters in a wash bay or floor drain that goes to the sanitary sewer.
- When working in the field, place all wastes in appropriate containers near the work site. If no public containers are available, containerize or bag the wastes and bring them back the shop for proper disposal.
- Minimize waste by purchasing recyclable products that have minimal packaging. Recycle cardboard, plastics and paper products as accepted by your local recycling agency.

Training

- Training on Infection Control and Waste Management shall be given to all waste handlers at project site to better manage the waste from "cradle" to "grave".

- Training should include how to recognize and report illegal connections or discharges
—annually or bi-annually

Record Keeping and Documentation

- Record of forms for waste disposal should be documented.
- Keep a list of all employees trained in the Project site or other location:
- Keep records on all wastes disposed of including: hazardous waste manifests, trash removal statements (bills), receipts or invoices from recyclers

F) PLAN FOR HOUSEKEEPING

Purpose

To provide a procedure for cleaning & sanitization all the areas within NHA Project Site(s).

Scope

This procedure is applicable to all sites of the facility for general cleaning and sanitization in facility premises.

Roles and Responsibility

- For Operation, Housekeeper (Administration department) is responsible.

Procedures

Many workplace hazards can be removed or eliminated through an effective worksite housekeeping routine. This doesn't just include a cleaning routine, but rather is an ongoing process of efficient tidying and safety practices, as following:

Maintenance of a safe work area

Work area should be monitored at regular intervals throughout the day and clear up. If trip hazards and mess is starting to build up, it must be sorted out.

Access routes clearance

A safe work area includes access and egress. Any materials/tools/benches etc. should not be kept in the access route in order to clear the way and to minimize any injury.

Safety in Housekeeping

Safety is essential for every job, and housekeeping has its safety concerns. Some aspects of going over during safety training for housekeepers include:

- Health Safety
 - Housekeepers work with various germs throughout their day. They need to know how to properly wash their hands, use gloves, and other personal protective equipment when doing specific cleaning tasks, and dispose of trash properly.
 - Housekeepers have the potential to be exposed to blood and other various human body fluids, so they must be trained in blood-borne pathogens and know how to safely handle these types of bodily fluids in these various situations.
- Fire Safety
 - In every job, all employees need to know what to do in case a fire occurs in the workplace. Housekeepers must be trained and know what is expected of them to do in case of a fire.

Training

Employees should be trained to properly manage and handle the following:

- Equipment
- Proper Use of Chemicals
- Maintenance
- Laundry and Various Housekeeping Duties
- Safety

Record Keeping and Documentation

Records to be maintained at construction sites play important role in construction activities. It is a document required to prove any construction activity has taken place at site during billing or any other claims. These records have all the data of various construction activities carried out at site.

- First and foremost, import records to be maintained on site are the working drawings approved by the clients and design engineer, based on which all the construction activities take place on site.
- Time and Progress Charts help in tracking the construction activities from time to time and help in effective planning, scheduling and controlling the construction projects activities. These charts need to be approved from the concerned authorities.
- All the orders given by clients to the contractor's need be maintained with serial numbers, signatures and dates as a work orders book.
- Works diary of a construction project should indicate contract agreement number, name of work, amount of contract, date of commencement of work, date of completion and extension time granted. All the relevant details need be entered daily in the works diary. This diary serves as an authentic record. Following details need to be entered in this diary with due care:
 - Weather at site
 - Important materials brought to site with their approximate quantity
 - Types of transport working at site
 - Types of tools and plants being used at site
 - Important items of works completed and passed on the particular date
 - Visits of VIPs and their remarks if any.
- Following records must also be maintained:
 - Labor Attendance Record and Daily Wages Sheet
 - Tests Results Record
 - Records of Changes, Deviation Orders and Amendments
 - Periodic bills records

G) MONTHLY REPORTING PLAN

Purpose

This procedure gives recording and reporting guidelines at workplace to report the injuries at facility, recovery progress, and compliance.

Scope

This guideline is applicable to all works working in the premises of project site. Following aspects are to be reported under scope of this guidance:

- work-related accidents
- specified injuries to workers
- work-related accidents which cause death;
- work-related accidents which cause certain serious injuries (reportable injuries);
- diagnosed cases of certain industrial diseases; and
- certain 'dangerous occurrences' (incidents with the potential to cause harm)

Responsibility

- It is the responsibility of each individual to report all work-related injuries and/or work-related illnesses immediately to his/her supervisor (no exceptions).
- Project Managers are required to maintain a record of information regarding every reported work-related injury and/or illness on the work-related injury/illness log
- Project Managers are responsible for knowing how to report a work-related Injury or Illness and completing a supervisor's incident/injury report.
- It is the responsibility of the injured/ill individual to submit all work-related documentation provided by a health care provider to their supervisor or facility manager.
- The Project Managers is required to submit a supervisor's incident/injury report for each work-related injury/illness to Project Director and to the regulatory body i.e., Labor Department. Report should be made on the prescribed forms within 24 hours.

Procedure

Online Reporting

The appropriate online report form can be appropriately filled and the form will then be submitted directly to the HSE office or the manager of database. A copy for records must be maintained for documentation.

Telephonic Reporting

All incidents can be also be reported online but a telephone service is also an option for reporting fatal and specified injuries only.

Reporting out of hours

- Project Manager has an out-of-hours duty officer. Circumstances where Project Manager may need to respond out of hours include:
 - a work-related death or situation where there is a strong likelihood of death following an incident at, or connected with, work;
 - a serious accident at a workplace so that Project Manager can gather details of physical evidence that would be lost with time; and
 - following a major incident at a workplace where the severity of the incident, or the degree of public concern, requires an immediate public statement from either Project Manager or government ministers.

Recordkeeping and Maintenance

Project Manager must keep a record of:

- any accident, occupational disease or dangerous occurrence which requires reporting;
and
- any other occupational accident-causing injuries that result in a worker being away from work.

H) CAMP MANAGEMENT PLAN

Purpose

The purpose of the plan is to define the actions to manage the workers' onsite accommodation during the construction activities during the NHA Project.

Scope

These guidelines are applicable for health and safety management at the campsite.

Roles and Responsibilities

Principal roles and responsibilities for the implementation of this plan are outlined below:

Construction Contractor & Subcontractors

- Construction Contractor has to ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of this Management Plan. Camp Manager(s) will be appointed in order to manage all workers' issues related to the accommodation.
- Construction Contractor have to ensure the effective implementation of this plan by issuing its own procedures addressing, detailing and customizing specific actions, measures and monitoring activities.
- Contractor's responsibility. The Contractor procedures has to include a description of allocated resources, responsibilities and communication procedures to relevant personnel.

Procedure

Management

Careful planning and a concern for health, safety and the environment are essential for good project management. Field camps or rented accommodations should provide adequate working, eating and sleeping arrangements for field personnel and should be appropriately equipped to encourage employees to work safely and efficiently. At the same time, camps should make as little impact as possible on the environment.

Project managers have to allow sufficient time to secure the required permits and permissions before sites are opened. The following factors are to be considered:

- Time of residence: Will the camp be in operation for a field season or year-round?
- Duration: Temporary or a permanent establishment
- Size of the camp (at each time of year)
- Accessibility: Transportation access (vehicle, helicopter and fixed wing) may impact the site selection
- Required permits

Audit and Review

The correct implementation of this Management Plan is verified through internal inspections and audits carried out according to the requirements of the company. The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors are indicated in the Audit Program that is developed and updated by Project Department.

Internal auditing will address:

- The correct implementation of this Management Plan;
- The correct development and implementation of Construction Contractor's Procedures;
- The correct and timely implementation of an auditing and review system by the EPC Contractor.

Reporting

Evidences of the implementation of the mitigation actions/measures and related results are collected through inspection and auditing activities. Reporting activities for this management plan is mainly related to:

- Main figures regarding the implementation of Worker's accommodation
- Main figures regarding undesired camp issues
- Collection, aggregation and recording of the data

Training

It should be ensured that employees are trained to do their jobs safely. Training must be related to operating the campsite.

First aid

Make sure that all first aid kits per the requirements of the OSH Act 2017 and OSH Rules 2019 and are replenished as needed. Make sure additional appropriate first aid is available at all times including stretcher(s).

Maintenance

A maintenance schedule should be established for the camp and equipment that includes regular inspections of all generators, pumps, hoses and fittings and other mechanized equipment, including all means of transportation. Maintenance schedules should be followed for water treatment and sewage treatment systems.

Documentation

Records should be maintained for inspections, training, first aid, safety meetings, and equipment maintenance records and communications logs.

Forms

Adequate supply of forms should be made for reporting incidents/accidents, such as required by the jurisdictional Workers' Compensation Board, spill reports, inspection and audit forms, maintenance check forms, etc.

Training

Training should be different on multiple stages, as following:

- Health and Safety During Staff Orientation
- Training During the Camp Season

During training, following aspects must be considered:

- Administration and Operations
- Health, Safety, and Risk Management
- Behavior Management

I) MANAGEMENT OF FOOD AND DRINKING WATER AT CAMPSITE(S) AND AT CONSTRUCTION SITE

Purpose

This guidance provides procedures for balanced, healthy and nutritional meals for field employees. Food-borne illness can, however, NHA through a camp and disable many people at one time. Therefore, hygienic food preparation and handling procedures and safe food storage are critical to maintaining employee health.

Scope

These guidelines are applicable for healthy food and safe drinking water at the campsite and at construction site.

Procedure for Food Safety

Food Preparation Safety

- Cross contamination is one of the most common causes of food-borne illness and occurs when bacteria from raw food (especially meat and poultry) is spread to other foods.
- Cooked food should be stored in freezer if required to be kept for more than four days.
- Use potable (drinking) water only to wash salad greens, fruits, vegetables and any food that will be consumed raw. It is advisable to wash pre-washed produce.
- If possible, use a designated cutting board for meat, poultry and seafood, and a separate board for vegetables and fruits. This way, raw fruits and vegetables will not be accidentally contaminated by raw meats etc. Wash cutting boards with hot soapy water and sanitizing solution after use. Keep raw meat, poultry and seafood separate from all other foods. Store them on the bottom shelf of a refrigerator. Then, leaking Sections will not drip onto other foods.
- In case raw meat is to be stored for more than a week then it should must be stored in freezers.
- Wash foods in a bowl, not in a water-filled sink. After washing meat, chicken, or fish, always wash the sink as well as the container, as splashed water may contain contaminating bacteria.
- When cooking meats, poultry or seafood on a grill, place the cooked food in a clean container. Discard marinades after raw items are removed.

Food storage tips

- Food handlers should unpack and inspect all food shipments for quality immediately after it arrives. Inspect for quality, freshness, and potential contamination including by vermin.
- After inspection, store it promptly for maximum safety. Proper storage includes both preservation of food quality by refrigeration and prevention of invasion by nuisance animals and insects. Never store food in sleeping tents.
- Store perishable goods in appropriate places – cupboards, refrigerators or freezers.
- Store heavy and bulky items on lower shelves but not necessarily the lowest shelf. Store foods in containers that are insect proof, rodent proof and bear proof, as required. Label the contents.

Animal and Insect Controls

Vermin include rats, mice, cockroaches, bedbugs, flies and other noxious animals or insects. Construct camp buildings to exclude vermin as best possible. Adequate steps are to be taken

to keep the premises free of vermin and insects by using appropriate fly screens, traps and baits insect sprays.

Housekeeping

- Set up the cooking area separate from the sleeping area. The space between these locations should be open with clear visibility if bears are a risk.
- Restrict food to the kitchen and dining areas; no food should be permitted in sleeping or work areas to control vermin (or bears).
- Set up handwashing facilities so workers can wash before meals. Workers should not wear dirty work clothes and boots in the kitchen and eating areas.
- Projects should have a policy stating that employees must not feed wildlife. Feeding wildlife encourages animals to become human habituated and food conditioned. Some carry life-threatening diseases such as rabies and plague.
- Camps should have an emergency lighting system in the kitchen area in the event of a power failure.

Health Surveillance of Kitchen Staff

- Kitchen staff must report to supervisor if they are suffering from fever, cold or diarrhea and they should not be allowed to work
- Annual health surveillance of kitchen staff is to be carried out and they are vaccinated against hepatitis, COVID 19, cholera etc.

Procedure for Drinking Water Safety

The primary risks associated with drinking water are disease-bearing organisms, turbidity and the presence of toxic chemicals or sewage that may contaminate drinking water. These are worldwide issues, and water in any locality and in any climate or terrain may be affected by one or more of these factors.

Determine the quantity of drinking water required for the camp. Consider the factors:

- whether the camp is temporary or permanent,
- number of employees,
- the season,
- type of activities at the Project Site
- existing and future requirements (showers, clothes washers, stoves, refrigerators, freezers) of the camp or project.

J) PROJECT SITE SECURITY PLAN

Purpose

To detail the General Security Requirements and Procedures for persons entering the site and to manage the onsite security to prevent any harm to employees and overall management.

Scope

Site Security Team ensures a high level of awareness for security measures implemented for general site access and for the facility amongst all staff is of critical importance not only for the safety of project staff and equipment at site. Measures to prevent any terrorist activities are to be ensured at all times.

Roles and Responsibility

- Site Security Team ensures the followings:
 - Local government and site policy requirements for the handling of controlled substances;
 - Prohibition of use of arms at site except for the authorized security staff
 - Prohibition of use of alcohol and drugs at site
 - Prohibition of smoking at site except in designated smoking areas
 - Prohibition of any violent behavior at site by the employees
 - Compliance with site security guidelines of NHA
 - Control of access to areas where contamination may result from unauthorized or untrained entry;
 - Control of access to areas containing Hazardous Chemicals;
 - Control and access to areas where project related documentation and other records are stored as well to equipment storage areas.

Procedures and Rules

- Site Entry Rules
 - The following business rules apply for access to the facility:
 - Entry into the facility premises is 'Restricted' to site employees and/or Approved contractors.
 - All visitors to site are to be provided with Induction Training including emergency procedures and fire assembly point,
 - Visitors and un-approved contractors are 'Not' permitted entry into the site building unless accompanied by a permanent staff member.
 - It is the responsibility of the hosting site staff member to remain with the visitors or contractors for the duration of their visit, whilst inside the Project site.
- Security Guard
 - The Security Guard must verify identity of the visitor and receive approval from the site authorities before allowing access
 - Security Guard accompanies the person into and out of the site for the emergency or to retrieve any personal belongings
- Multiple Duty Shifts
 - Site security policy is that any person remaining at the Project site in all shifts must report his presence at the site to the Project Manager.
- Overtime
 - Work staff may work overtime only at defined shift timings.
- Terminated Employees

- Managers must ensure that the ID badge and any facility keys held by the terminated employee are collected and returned to the Security Management team before the employee leaves the site.
- Contractors and Visitors
 - All visitors and contractors must produce photo identification and be signed into the site visitor's book at the security gatehouse.
 - Visitors and contractors will be issued a visitors' badge and must display the badge at all times, whilst on the site.
 - Security will ask visitors / contractors to wait at the Security or Reception area for collection by the nominated site contact person before continuing on inside the site.
- Building Alarms and Security Lighting
 - The Manufacturing Building is protected by alarm systems.
 - Defective external building lighting and essential walkway / corridor lighting should be reported immediately and not be isolated for any reason without prior consultation with the to the Facilities Manager.
- Fire and Security Surveillance Schedules
 - At all times and especially when the site is un-occupied or during the evenings
 - Security Officers on duty are required to visually inspect / check defined patrol areas.
 - The areas are defined by the patrol electronic button system to enable reporting of patrols to the security management team.
 - The inspection / patrol should check for:
 - Ensure that there are no signs of fire present in the building;
 - Ensure that all entry, exit and emergency exit doors are secure;
 - Check for signs of forced entry or fraudulent activity.
 - If a Fire is Detected, the Security Guards are to initiate emergency procedures immediately.
- Parking of Vehicles
 - Vehicles should be parked only at the defined area of parking.
 - The guard should help the employees in proper parking in ready to move position.
- Monitoring the exit of employees
 - The guard should monitor the exit of employees at end of the day's work and keep a check that all employees are mentioning the correct exit time.
 - Ensure that the main gate is locked after everyone has left the premises.
 - The extn phone is put on the cradle for charging overnight.

Training

Listed below are suggested mandatory trainings for applicable staff functions:

- Data Security, Privacy and Confidentiality
- Interaction with regulatory authorities and lending authorities viz AIIB personnel
- Emergency Response Plan

Record Keeping and Documentation

It is the responsibility of the Project Manager to ensure trainings are completed and logs archived. These trainings will be recorded and kept in the Project file and employment history and will be made available for audit purposes at any time.

K) PLAN FOR EXTERNAL VISITS

Purpose

The purpose of this procedure is to ensure that visits by regulatory authorities and lending agencies are conducted with due protocols.

SCOPE

This procedure is applicable for visits by external agencies to all NHA Project Sites.

RESPONSIBILITIES

The Project Manager will be responsible for overall coordination of visit to the Project Site(s) by regulatory agencies – Labor Department, Environmental Protection Agency and lending agencies –Asian Infrastructure Investment Bank.

PROCEDURE

SCHEDULED VISITS

Visit /Audits by AIIB

- a) AIIB auditors conduct visits of Project Site(s) to check that the Project is being managed in compliance with the requirements of the AIIB Environmental and Social Framework and related Standards.
- b) The Project Manager must ensure that all necessary documentation is available and up to date at the Project Site.
- c) The observations by the AIIB auditors are to be noted and action plans prepared on receipt of the audit report.

Visit by Regulatory Agencies

- a) Such visits may be scheduled or impromptu or visit after receipt of accident report.
- b) The Project Manager must meet the regulatory agency personnel or delegate a supervisor to conduct the visit.
- c) All required documentation must be shared with the regulatory personnel.
- d) The observations made during the visit are to be noted and compliance ensured on receipt of the report.
- e) Compliance report shall be prepared and sent to the concerned regulatory agency.

L) PLAN FOR INTERNAL AUDITS

Purpose

The purpose of this procedure is to have a defined procedure in place for conducting EHS Audits (inspections, Self-Audits) as per agreed schedule against the Labor Management Plan, Local Regulatory Requirements, and AIIB ESF 2016 (amended 2024) and Guidance Note

SCOPE

This procedure is applicable to all NHA Project Sites.

RESPONSIBILITIES

The Project Manager will be responsible for overall coordination of NHA audits at Project Sites. The Project Manager will be responsible of issuing internal audit report within two weeks of the audit followed by the audit action plan within one month of the audit to all concerned. The internal audit report compliance status will be discussed in the Site Monthly Project Committee Meetings.

Department Manager / Supervisor will be responsible for carrying out H&S Audit of their respective areas quarterly (attachment 03). The findings of inspections will be discussed in the Monthly Project Committee Meeting.

PROCEDURE

1.1 AUDIT SCHEDULE

- Internal H&S Audits of the Project Sites are to be conducted quarterly as per Internal audit schedule.
- The audit schedule will be approved by the Director Projects & and a copy is to be distributed to all concerned.

1.2 AUDIT TEAM

Following will be the internal audit team members at respective Sites:

- Project Manager/ Supervisor
- Engineering Manager /Supervisor
- Site Labor and OHS Representative
- Occupational Health Physician / Technician (if required)

1.3 EHS INSPECTIONS

- Department/Area inspections will be carried out by the Project Supervisor using the checklist (attachment 03) every week. The purpose is to evaluate the physical H&S conditions / requirements at the workplace.

1.4 AUDIT INITIATION

The internal EHS audit schedule will be conveyed one week prior to the audit to the concerned personnel.

Attachment 01
INTERNAL H&S AUDIT REPORT

Area:

S #	Observation	Recommendations

Attachment 02
INTERNAL H& S AUDIT ACTION PLAN

S #	Recommendation	Action Required	Action By	Target Date	Status / Comments

Department / Area : _____

Date of Inspection: _____

Conducted by: _____

Attachment 03
PROJECT SELF-INSPECTION REPORT

Note: Area inspections to be carried out every week

S #	Description	Observation / Action Required	Responsibility	Target Date	Comments
1.	General House-keeping Area / Dust				
2.	Flooring Surface Condition				
3.	Ventilation Air Conditioning				
4.	Lighting Mounting Bulbs & Shades				
5.	Electrical Switch Boards / Wiring				
6.	Work Station Table, Chair, Stools, Platforms				
7.	Machinery / Equipment Positioning / Guarding/Condition				
8.	Waste Management Disposal Procedure / Record				
9.	First – Aid First-aid Box Items, Eye-Wash Station Record				
10.	Personal Protective Equipment Required PPE's in Use/condition				
11.	Accident / Incident and Near Miss Reporting and Records				
12.	Lifting Devices				

S #	Description	Observation / Action Required	Responsibility	Target Date	Comments
	Cranes, Pallet Trolleys, Fork Lifters etc.				
13.	Ladders & Platforms Condition				
14.	Material Storage Fuel Storage, Other materials storage areas				
15.	Emergency Exits/ Assembly Point Exit Passage				
16.	Safety Signboards Displayed in areas				
17.	Fire Extinguishers Checked				

General Remarks

ANNEXURE III – TEMPLATE FOR WORKER’S CODE OF CONDUCT

Code of Conduct

I, _____, acknowledge that preventing any misconduct as stipulated in this code of conduct, including sexual exploitation and abuse (SEA), sexual harassment (SH), and child abuse/exploitation are important. Any activity, which constitute acts of gross misconduct are therefore grounds for sanctions, penalties or even termination of employment. All forms of misconduct are unacceptable be it on the work site, the work site surroundings, or at worker's camps. Prosecution of those who commit any such misconduct will be pursued as appropriate. I agree that while working on this project, I will:

1. Consent to security background check;
2. Treat women, children (persons under the age of 18) and persons with disability with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, birth or other status;
3. Not use language or behavior towards men, women or children/learners that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
4. Carry out his/her duties competently and diligently;
5. 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;
6. 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.
7. 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 danger to his/her life or health;
8. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
9. not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel;
10. Not participate in sexual activity with children/learners—including grooming or through digital media. Mistaken belief regarding the age of a child and consent from the child is not a defense;
11. Not exchange money, employment, goods, or services for sex, with community members including sexual favors or other forms of humiliating, degrading or exploitative behavior;
12. Attend trainings related to HIV and AIDS, SAE/SH, GBV, Child Abuse, occupational health and any other relevant courses on safety as requested by my employer
13. Report to the relevant committee any situation where I may have concerns or suspicions regarding acts of misconduct by a fellow worker, whether in my company or not, or any breaches of this code of conduct provided it is done in good faith;
14. Regarding children (under the age of 18):

- a) Refrain from hiring children for domestic or other labor, which is inappropriate given their age, or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
 - b) Comply with all relevant local legislation, including labor laws in relation to child labor.
- 15. Refrain from any form of theft for assets and facilities including from surrounding communities.
 - 16. Remain in designated working area during working hours;
 - 17. Refrain from possession of alcohol and illegal drugs and other controlled substances in the workplace and being under influence of these substances on the job and during working hours;
 - 18. Follow prescribed environmental occupation health and safety standards;
 - 19. Channel grievances through the established grievance redress mechanism.

I understand that the onus is on me to use common sense and avoid actions or behaviors that could be construed as misconduct or breach this code of conduct.

I acknowledge that I have read and understand this Code of Conduct, and the implications have been explained with regard to sanctions on-going employment should I not comply.

Signed by: _____

Signature: _____

Date: _____

For the Employer/Contractor

Signed by: _____

Signature: _____

1. Date: _____

