

**PROPOSED 400kV UGANDA-TANZANIA INTERCONNECTOR PROJECT (UTIP) FROM IBADAKULI SUBSTATION IN SHINYANGA REGION VIA GEITA REGION, NYAKANAZI AND KYAKA SUBSTATIONS IN KAGERA REGION TO MASAKA WEST IN UGANDA (548.91 km)**



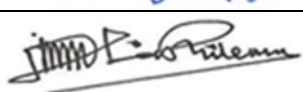
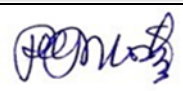
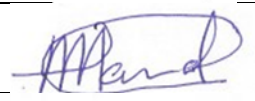
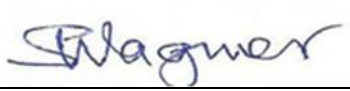

**P.14 - LABOUR MANAGEMENT PROCEDURES (LMP)**

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## LIST OF ACRONYMS AND ABBREVIATIONS

CEP	Construction Environmental Plan
CPE	Collective Protective Equipment
EBRD	European Bank for Reconstruction and Development
E&S	Environmental and Social
EHS	Environment, Health and Safety
EPR	Emergency Preparedness and Response
ESCP	Environmental and Social Commitment Plan
ESIRT	Environmental and Social Incident Response Toolkit
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
HRP	Human Resources Policy
HR	Human Resources
IFC	International Finance Corporation
ILO	International Labour Organization
LMP	Labour Management Procedures
LPG	Liquefied Petroleum Gas
M&E	Monitoring & Evaluation
NC	Non-Conformities
OHS	Occupational Health and Safety
OHSP	Occupational Health and Safety Plan
PPE	Personal Protective Equipment
RCMU	Resettlement and Compensation Management Unit
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
SS	Substation
TANESCO	Tanzania Electric Supply Company Limited
TL	Transmission Line
WB	World Bank

## 1. Justification

This Labour Management Procedures (LMP) has been developed to guide the management of all categories of workers involved in the Uganda-Tanzania Interconnection Project (UTIP), in accordance with national labour legislation and the World Bank's Environmental and Social Framework (ESF), particularly Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions.

The LMP defines key policies, procedures, and responsibilities to ensure fair treatment, non-discrimination, health and safety protections, and effective grievance mechanisms for all workers associated with the Project. It also addresses the obligations of TANESCO, contractors, and subcontractors to manage labour-related risks—including those associated with labour influx, occupational health and safety (OHS), child and forced labour, and gender-based violence (GBV)—throughout all phases of the project lifecycle.

In accordance with ESS1 (paragraph 26) and the provisions of ESS2, this document contributes to the comprehensive environmental and social risk management system of the Project, placing emphasis on worker rights, safety standards, and transparent channels for grievance redress.

This LMP applies to all categories of project workers as defined under ESS2, including direct workers employed by TANESCO, contracted workers hired by contractors and subcontractors, and primary supply workers involved in the provision of critical materials or equipment. Local workers will be recruited from towns and communities located along the transmission line corridor and near substation sites, in accordance with the provisions of the Local Hiring Programme. The Project aims to achieve a local employment target of 20–30% of the total workforce, with a particular focus on filling semi-skilled and unskilled positions with residents from the project's area of influence.

Please note that this LMP is a living document. It will be updated and revised as needed throughout Project implementation to reflect evolving workforce requirements, legal changes, new risks or mitigation strategies, and lessons learned during monitoring and stakeholder engagement. All updates will be reviewed and approved by TANESCO, and where required, by the World Bank.

## 2. Description of Labor Needs

At this stage, detailed workforce projections—particularly for contractor mobilization schedules and supplier hiring—have not been provided by TANESCO or its contractors. Therefore, the information presented herein is based on reasonable assumptions and professional estimates developed by JGP, informed by: (i) Typical workforce profiles for transmission projects of similar scale and terrain; (ii) Preliminary schedules described in the ESIA (**Sections 5.6.1 and 5.6.2**); (iii) Organizational data obtained from TANESCO's Resettlement and Compensation Management Unit (RCMU).

The implementation of the UTIP Project will require a diverse and phased labour force, involving workers from multiple categories and disciplines throughout the construction,

support, and operational stages. In line with ESS2 definitions, the Project will engage the following types of workers: direct workers, contracted workers, and primary supply workers. No community workers are expected to be employed under this Project.

## 2.1 Construction Workforce (Contracted Workers)

The majority of the labour demand under the UTIP Project will stem from the execution of civil works, including the construction of transmission lines, substations, access roads, and workers' camps. As outlined in **Section 5.6.2** of the ESIA, it is estimated that approximately 1,350 contracted workers will be engaged at the peak of construction. These workers will be progressively mobilized in line with the implementation schedule presented in **Section 5.6.1** and deployed across various work fronts along the transmission corridor.

Based on typical workforce distributions observed in similar large-scale transmission projects, the 1,350 contracted workers are expected to include approximately 25% skilled workers (around 340 individuals), such as engineers, site supervisors, electricians, welders, crane operators, and equipment specialists. Semi-skilled workers—including carpenters, masons, drivers, cooks, and security guards—are projected to represent around 35% of the workforce (approximately 470 individuals). The remaining 40% (about 540 workers) will be unskilled workers, responsible for tasks such as excavation, manual transport of materials, site cleaning, and other general support services.

In addition, an estimated 650 indirect workers will be engaged by service providers to support logistics, waste management, catering, and the operation of construction camps. A total of nine workers' camps will be established along the transmission line corridor (see **Section 5.3.1** of the ESIA), all of which will be designed and operated in accordance with national legislation and the IFC/EBRD Guidelines on Workers' Accommodation (2009), with due consideration to hygiene, health, safety, and environmental standards.

The Project's recruitment strategy gives strong priority to local employment, particularly in semi-skilled and unskilled roles. Workers will be hired from towns and communities along the transmission line and near substation sites. In line with the **Local Hiring Programme (P.13)**, the Project targets a 20–30% local employment rate, contributing to local economic development and reducing risks associated with labour influx.

## 2.2 Support and Oversight Workforce (Direct Workers)

In parallel with construction, TANESCO will maintain a team (i.e., TANESCO's Management Team) of direct workers responsible for management, technical oversight, and implementation of safeguard measures. Based on the currently available structure of the RCMU (Resettlement and Compensation Management Unit), and other internal project units, it is estimated that 50 to 70 TANESCO staff will be engaged during implementation. These staff will include:

- Project Manager and Deputy
- Environmental, Social, and OHS Specialists



- Monitoring & Evaluation (M&E) Officers
- Legal, Financial, Procurement, and Contract Management Officers
- Land Surveyors and RAP field teams
- Administrative and support personnel

These workers will ensure compliance with the LMP, ESMP, SEP, GBV Action Plan, and related instruments. In some cases, TANESCO may complement this team with external consultants or firms for supervision and audit functions.

### 2.3 Operation Phase Workforce

During the operation phase, TANESCO will employ a permanent team of approximately 25–30 direct workers for operation and maintenance of substations and transmission infrastructure. This team will include substation operators, electrical technicians, maintenance crews, and field supervisors.

### 3. Main Objectives

The main objective of the Labour Management Procedures (LMP) is to ensure that appropriate labour management policies and procedures are in place in the Project. To this end, it will have the following specific objectives:

- Prepare and implement a Human Resources Policy aligned with Tanzanian legislation, World Bank ESS2, ILO Conventions and other applicable international requirements, including procedures for hiring, training and retrenchment of the workforce;
- To consider gender equality and prevent discrimination in the development of the recruitment, training and retrenchment of the workforce procedures of the Human Resources Policy;
- Benefit the population in the area of influence, mainly in the villages crossed by the project, especially those where construction sites will be set up, through the use of local labour in construction activities (aspects outlined in the **P.13 - Local Hiring Programme**);
- Establish working and employment conditions;
- Implement a Grievance Mechanism for workers;
- Detail a Workers' Code of Conduct to standardise criteria for the conduct of workers in dealing with the communities and neighbourhoods surrounding the works and support areas, as well as standards of behaviour aimed at controlling pollution and preserving natural resources, including the protection of flora and fauna during the execution of the works. The Code will have a gender equity approach aimed at preventing practices of gender-based violence (GBV) and of sexual exploitation and abuse and sexual harassment (SEA/SH) and prevent unwanted pregnancies, with aspects outlined in the **P.15 - Gender Based Violence Action Plan (in Annex 16)**.
- To protect workers. This will include the Occupational Health and Safety Programme (OHSP) to be prepared and implemented by TANESCO and its Contractors in line with the standards detailed in **Chapter 10.0 (P.17 - Occupational Health and**

## Safety Management Programme.

### 4. Applicable Legislation

This chapter outlines the national legal framework governing the project, detailing key legislative instruments and their requirements. The framework comprises laws and policies—including the Sexual Offences Special Provisions Act (1998), National Women and Gender Development Policy (2000), Penal Code (Cap 16, revised 2002), National Gender Policy (2002), National Employment Policy (2003), Employment and Labour Relations Act (2004), Labour Institutions Act (2004), National Health Policy (2007), Anti-Trafficking in Persons Act (2008), Child Act (2009), Criminal Procedure Act (2018), Legal Aid Act (2017), and the National Mechanism on Gender Based Violence/Sexual Exploitation and Abuse—that together provide comprehensive standards on worker protection, non-discrimination, grievance redress, and social justice.

Key requirements in these instruments include:

- Worker Protection and Non-Discrimination: Mandates for safe work environments, gender equality, and mechanisms for reporting and addressing sexual exploitation, abuse, and harassment.
- Child Labour and Vulnerable Groups: Strict prohibitions and age limits (e.g., a minimum age of 14 years) aimed at protecting minors and other vulnerable workers.
- Legal Recourse and Enforcement: Provisions for legal aid and structured grievance procedures to ensure that rights under these laws are effectively enforced.

Below in **Table 4.a**, is presented a list of the key legislation applicable to this LMP.

**Table 4.a**  
**Applicability of the Legal Framework**

Legal Instrument	Comments on Applicability
Sexual Offences Special Provisions Act, 1998	Defines and sanctions sexual offences, underpinning measures to prevent sexual harassment and abuse, in line with ESS2 requirements.
National Women and Gender Development Policy, 2000	Promotes gender equality and empowerment, ensuring a gender-sensitive workplace; may need enhanced monitoring to fully meet ESS2 standards.
Penal Code (Cap 16) (revised 2002)	Provides general criminal sanctions for harassment and abuse, reinforcing worker protection; may require project-specific adaptations for comprehensive ESS2 compliance.
National Gender Policy, 2002	Establishes principles of non-discrimination and equal opportunity; supports equitable treatment but could benefit from additional enforcement mechanisms at the project level.
National Employment Policy, 2003	Sets guidelines for fair employment practices and labor relations; forms a basis for the LMP though it might lack detailed occupational safety elements required under ESS2.
Employment and Labour Relations Act (Act No. 6), 2004	Regulates labor relations and dispute resolution, supporting structured grievance mechanisms; additional measures may be needed to address informal labor sectors.



**Table 4.a**  
**Applicability of the Legal Framework**

Legal Instrument	Comments on Applicability
Labour Institutions Act (Act No. 7), 2004	Enables the establishment of labor institutions to enforce labor standards; provides a framework for worker rights but may require further project-specific adaptation.
National Health Policy, 2007	Sets standards for occupational health and safety, ensuring worker well-being; integration with ESS2 risk assessments is essential for enhanced protection.
Anti-Trafficking in Persons Act, 2008	Addresses human trafficking and exploitation, protecting vulnerable groups; critical for preventing abuse, yet should be closely aligned with ESS2 monitoring and reporting.
Child Act, 2009	Enforces child labor protections and minimum age requirements; directly supports ESS2's focus on protecting minors, though enforcement mechanisms may need strengthening.
Criminal Procedure Act 7, 2018	Outlines procedures for prosecuting violations, ensuring accountability; may require adjustments to expedite cases related to labor issues under ESS2.
Legal Aid Act, 2017	Guarantees access to legal assistance for workers and vulnerable groups, supporting grievance redress; could be further enhanced to resolve project-specific disputes efficiently.
National Mechanism on Gender Based Violence/Sexual Exploitation and Abuse	Provides structured measures for preventing, reporting, and responding to GBV and SEA; essential for ESS2 compliance and requires robust integration within the LMP.

Notably, certain gaps may arise when comparing these national provisions with the World Bank's ESS2. For instance, while the national framework addresses gender and labour rights, it may lack explicit mechanisms for integrating modern occupational health and safety standards, detailed reporting systems, or comprehensive approaches to managing subcontracted and informal labour—areas that are critical under ESS2. To address these potential gaps, the project's Labor Management Plan (LMP) will incorporate targeted measures to ensure that all aspects of national legislation are effectively aligned with ESS2 requirements.

### **International requirements**

This chapter outlines the international framework that complements the national legislation to ensure compliance with ESS2. Key international instruments include the World Bank Environmental and Social Standards (ESS1 and ESS2), World Bank EHS Guidelines, and the Guidance Note on Addressing Sexual Exploitation and Abuse and Sexual Harassment (2022). Additionally, the project aligns with the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and relevant ILO conventions ratified by Tanzania—covering areas such as workmen's compensation, forced labour, equal remuneration, and child labour—as well as the ILO Declaration on Fundamental Principles and Rights at Work. These international standards reinforce the project's commitment to providing a safe, respectful, and equitable working environment, thereby ensuring that the LMP fully integrates both national legal obligations and international best practices in labour and human rights management.

Below in **Table 4.b**, is presented a list of the International Requirements applicable to this LMP.

**Table 4.b**  
**Applicability of the International Requirements**

<b>International Requirements</b>	<b>Comments on Applicability</b>
World Bank ESS 1 and 2	Define comprehensive environmental and social risk management; emphasize worker rights, grievance mechanisms, and safety standards.
World Bank ESS4 (Community Health and Safety)	It is applicable to the Project given the potential risks associated with labour influx, the establishment and operation of workers' camps, increased vehicular traffic, and potential community exposure to construction-related hazards. The Project will implement mitigation measures to manage these risks, including those related to communicable diseases, GBV/SEA/SH, road safety, and public health impacts in accordance with the ESMP, the Stakeholder Engagement Plan (SEP), and the GBV Action Plan (Annex 16).
World Bank EHS Guidelines	Provide technical standards that complement national measures and ensure robust risk assessments and safety procedures.
World Bank Guidance Note on Addressing SEA/SH, 2022	Offers specific guidance to prevent and address sexual exploitation and harassment, strengthening project safeguards.
CEDAW	Mandates gender equality and non-discrimination; requires integration of gender-sensitive practices within the project framework.
ILO Declaration on Fundamental Principles and Rights at Work	Establishes core labour rights, including freedom of association and prohibition of forced labour, child labour, and discrimination.
<b>ILO Conventions ratified by Tanzania</b>	<b>Set minimum standards for worker protection and labour rights; additional measures may be needed to fully meet ESS2 requirements.</b>
<i>C017 - Workmen's Compensation Convention, 1925 (No. 17)</i>	<i>Ensures compensation for workplace accidents; supports safety measures in high-risk areas.</i>
<i>C019 - Equality of Treatment (Accident Compensation) Convention, 1925 (No. 19)</i>	<i>Provides for equal accident compensation, reinforcing non-discrimination in worker benefits.</i>
<i>C029 - Forced Labour Convention, 1930 (No. 29)</i>	<i>Prohibits forced labour, reinforcing the commitment to voluntary work and human dignity.</i>
<i>C087 - Freedom of Association Convention, 1948 (No. 87)</i>	<i>Guarantees workers' rights to unionize and organize, supporting effective dispute resolution mechanisms.</i>
<i>C094 - Labour Clauses (Public Contracts) Convention, 1949 (No. 94)</i>	<i>Requires inclusion of labour clauses in public contracts to safeguard worker rights.</i>
<i>C095 - Protection of Wages Convention, 1949 (No. 95)</i>	<i>Mandates timely and full wage payments, ensuring economic security for workers.</i>
<i>C098 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98)</i>	<i>Supports collective bargaining processes to promote fair labour practices.</i>
<i>C100 - Equal Remuneration Convention, 1951 (No. 100)</i>	<i>Ensures equal pay for equal work, addressing gender wage disparities.</i>
<i>C105 - Abolition of Forced Labour Convention, 1957 (No. 105)</i>	<i>Reinforces the prohibition of forced labour and exploitative practices.</i>
<i>C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111)</i>	<i>Prohibits discrimination in employment, aligning with international non-discrimination standards.</i>

**Table 4.b**  
**Applicability of the International Requirements**

<b>International Requirements</b>	<b>Comments on Applicability</b>
<i>C131 - Minimum Wage Fixing Convention, 1970 (No. 131)</i>	<i>Guides the establishment of minimum wage policies to protect worker rights.</i>
<i>C135 - Workers' Representatives Convention, 1971 (No. 135)</i>	<i>Supports the role of worker representatives, enhancing collective dialogue and participation.</i>
<i>C138 - Minimum Age Convention, 1973 (No. 138)</i>	<i>Sets a minimum employment age (14 years), protecting minors from exploitation.</i>
<i>C142 - Human Resources Development Convention, 1975 (No. 142)</i>	<i>Focuses on workforce development and vocational training to enhance worker capacity.</i>
<i>C148 - Working Environment Convention, 1977 (No. 148)</i>	<i>Addresses air pollution; its limited scope on noise and vibration may require additional project-specific assessments.</i>
<i>C154 - Collective Bargaining Convention, 1981 (No. 154)</i>	<i>Emphasizes collective bargaining to improve labour conditions and foster effective worker-employer dialogue.</i>
<i>C182 - Worst Forms of Child Labour Convention, 1999 (No. 182)</i>	<i>Targets the elimination of the worst forms of child labour, reinforcing measures to protect vulnerable minors.</i>
<b>ILO Convention not ratified by Tanzania:</b>	<b>Serve as aspirational benchmarks for worker protection and rights.</b>
<i>C190 - Violence and Harassment Convention, 2019 (No. 190)</i>	<i>Provides guidance on mitigating workplace violence and harassment, informing risk management despite non-ratification.</i>

## 5. Responsibilities

This section defines the respective responsibilities of TANESCO and contracted parties for the effective implementation of the Labour Management Procedures (LMP) throughout the project lifecycle, in alignment with Tanzanian labour law, International Labour Organization (ILO) conventions, and the World Bank Environmental and Social Standard 2 (ESS2).

### 5.1 Responsibilities of TANESCO

TANESCO is the overall implementing agency responsible for:

- Developing and implementing its own Human Resources Policy (as per minimum content in **Annex A – HR Policy Template**) for the management of direct workers, aligned with ESS2 and national labour legislation;
- Reviewing and approving the Human Resources Policies (HRPs) of all contractors and subcontractors before mobilization;
- Reviewing and approving each contractor's Occupational Health and Safety Plan (OHSP) and Emergency Preparedness and Response (EPR) Plan, as per the ESMP (**P.02**);
- Overseeing the full implementation of the LMP, including worker-related standards, OHS, grievance management, labour influx control, and SEA/SH prevention;
- Ensuring the preparation and World Bank clearance of Labour Influx Plans by all contractors, in accordance with the GBV Action Plan (**Annex 16**);
- Deploying a Supervision Team (internal or outsourced), tasked with:

- Monitoring contractor and subcontractor compliance with the LMP and related instruments (OHSP, ESHS Management Plan, GBV Action Plan, Workers' Code of Conduct);
- Conducting regular audits, site inspections, and documentation reviews;
- Issuing recommendations and non-compliance notices where required;
- Appointing a Compliance Officer to liaise with contractors and ensure continuous adherence to HR procedures and legal obligations.

For the operational phase, TANESCO will prepare a separate HR Policy applicable to the permanent workforce, including training and grievance systems under the same standards.

## 5.2 Responsibilities of Contractors and Subcontractors

Each contractor and subcontractor engaged in the Project shall:

- Submit a Human Resources Policy (HRP) for TANESCO's review and approval, prior to the commencement of any construction activities. The HRP must, at a minimum, follow the structure and contents outlined in Annex A – HR Policy Template, and be consistent with national labour laws, ESS2, and ILO conventions.
- Ensure that the HRP includes, at a minimum, the following elements:
  - Clear procedures for worker recruitment, onboarding, training, supervision, and retrenchment, including a commitment to non-discrimination and equal opportunity;
  - A detailed Occupational Health and Safety (OHS) Plan and Emergency Preparedness and Response (EPR) Plan, aligned with the ESMP (Annex P.02);
  - An accessible and confidential Grievance Redress Mechanism (GRM) for all workers, including protection from retaliation and regular reporting to TANESCO;
  - Clear policies and procedures to ensure full compliance with child labour and forced labour prohibitions, including age verification and supplier oversight;
  - A Workers' Code of Conduct, addressing behavioral expectations, community relations, SEA/SH prevention, and disciplinary procedures;
  - Provisions for labour influx management and, where applicable, workers' accommodation in line with the IFC/EBRD Guidelines.
- Prepare a Labour Influx Plan (as per Template included in Annex B), including SEA/SH risk mitigation and health and safety measures, for approval by the World Bank as required under the GBV Action Plan;
- Ensure all workers are inducted on:
  - The HRP and Code of Conduct;
  - Safety and compliance requirements;
  - Community interaction protocols;
- Designate key personnel with defined responsibilities:
  - HR Manager: oversees recruitment and legal compliance;
  - Training Coordinator: develops and delivers all worker training;
  - GRM Officer: manages and tracks resolution of grievances, and reports regularly to TANESCO.

All contractors are responsible for extending these obligations to all subcontractors and primary suppliers under their control. Failure to comply with the approved HRP, LMP, or other related instruments will trigger corrective action measures in accordance with contractual obligations and supervision protocols.

## **6. Methodology**

### **6.1. Preparation of a Human Resources Policy**

TANESCO shall prepare a Human Resources (HR) Policy (or equivalent instrument) to formalize the Project's commitment to Tanzanian labour legislation, WB ESS2, ILO Conventions and other applicable international requirements, and to establish procedures to ensure compliance. It shall apply to workers hired directly by TANESCO, and also by the Contractors, subcontractors, suppliers (workers in the supply chain) and consulting firms eventually hired to carry out Project activities.

The HR Policy shall detail procedures for at least the following processes and activities:

- (i) Recruitment and qualification of staff;
- (ii) Salaries and benefits practices;
- (iii) Disciplinary measures;
- (iv) Conflict prevention (consultation and grievance mechanisms);
- (v) Admission and dismissal process;
- (vi) Training
- (vii) Retrenchment.

The procedures for recruitment and other aspects of the employment relationship (remuneration, working conditions and terms of employment, access to training, job assignment, promotion, dismissal and disciplinary practices) must ensure that there is no discrimination, exclusion or preference based on grounds of: colour, race, gender, gender identity, sexual orientation, age, nationality, ethnicity, social origin, political opinion, trade union membership or religious belief, disability status - dysfunctionality, pregnancy, parental leave, teenage mothers, marital status or other factor, assuring that equal opportunity is provided to all internal Project stakeholders, including workers of Contractors and subcontractors. It must also ensure the prohibition of sexual harassment, sexual and gender-based violence, violence against children, child labour, forced labour or conditions equivalent to forced labour, trafficking for sexual and labour exploitation, and respect for people in vulnerable conditions.

The HR Policy procedures must ensure that a healthy worker – management relationship is established, maintained and continuously improved over time according to the National Labour Laws and its regulations together with the Occupational Safety and Health Authority Act at the workplace.

A career plan and promotion practices based exclusively on merit and performance should also be foreseen as part of the HR Policy.

The policy must comply with all Tanzanian legislation regarding labour and employment terms and be aligned with international standards. The policy should make clear the prohibition of work by minors under 14 years of age, as established in the Tanzanian Employment and Labour Relations Act (revised edition 2019). It should also guarantee respect for the right to form labour organisations, for the rights to collective bargaining.

The HR Policy procedures must ensure safe and healthy working conditions and the health of workers, observing the World Bank EHS Guidelines.

### **6.1.1. Procedure for Strengthening Child Labour Prevention in Contractor and Supplier Selection**

#### Presentation

As part of the implementation of the HR Policy, the main contractor will implement a procedure for strengthening child labour prevention in contractor and supplier selection. This procedure aims to enhance the child labour prevention measures within the contractor and supplier selection process, ensuring full compliance with the Tanzanian labour laws, World Bank ESS2 standards, and ILO conventions. It introduces additional screening, monitoring, and enforcement mechanisms to mitigate the risk of child labour in the supply chain during the construction phase.

This procedure applies to all contractors, subcontractors, and suppliers involved in the Uganda-Tanzania Interconnector Power Project during the construction phase. It covers pre-selection, contract negotiation, and ongoing monitoring to ensure compliance with child labour regulations.

#### Roles and Responsibilities

- TANESCO Supervision Team: Responsible for overseeing the selection, screening, and auditing of contractors and suppliers.
- Contractors/Subcontractors: Required to adhere to the LMP, report on compliance with child labour regulations, and cooperate with audits.
- Independent Auditors: Conduct child labour compliance audits as part of the due diligence process.

#### Pre-Selection Screening

All contractors and primary suppliers must confirm in writing their full compliance with Tanzanian labour laws and the requirements of the World Bank's Environmental and Social Standard 2 (ESS2), particularly paragraphs 18 and 19, which prohibit the use of forced labour and restrict the employment of children below the minimum legal working age. This confirmation must include adherence to the national minimum working age of 14 years, and relevant ILO conventions on child labour and forced labour.

As part of the pre-selection process, contractors and suppliers shall submit documentation describing their labour management systems, including recruitment procedures, worker



verification processes, and grievance mechanisms. They must also provide verifiable age documentation for all current workers and a signed Child Labour and Forced Labour Compliance Certification, attesting that their labour practices conform with applicable national laws and ESS2.

TANESCO's Supervision Team will carry out background checks on all prequalified firms, with a focus on past performance related to labour compliance—particularly child labour and OHS issues. This review may include the evaluation of previous project records, internal labour policies, and public incident records where applicable.

Failure to submit the required compliance certification or to meet the labour standards referenced above will result in disqualification from the procurement process.

#### Contractual Obligations

Contracts with all contractors and suppliers will include clear clauses prohibiting child labour. These clauses must specify the penalties for non-compliance, including termination of contracts and legal action.

#### Commitment to Audits

Contractors and suppliers must agree to regular unannounced audits by TANESCO or independent third-party auditors. The results of these audits will be documented and reviewed to ensure ongoing compliance.

#### Monitoring and Enforcement

TANESCO's supervision team, in collaboration with independent auditors, will conduct regular audits of all contractors and suppliers to verify compliance. These audits will include:

- Age verification of all employees.
- Interviews with workers to confirm their recruitment process.
- Documentation reviews of recruitment and employment records.

The project's grievance mechanism, outlined in the LMP, will be accessible to all workers. This mechanism will include anonymous reporting channels to allow workers to report child labour or related abuses without fear of retaliation.

Contractors and suppliers must submit monthly labour compliance reports to TANESCO, detailing their adherence to labour laws, including child labour provisions. These reports must include age verification data and any incidents of non-compliance, along with corrective actions taken.

#### Non-Compliance and Penalties

In the event that child labour violations are identified through audits, inspections, or grievances, TANESCO will initiate a formal investigation. The contractor or supplier in question must provide a response and take immediate corrective action.

Contractors or suppliers found in violation of child labour laws will face penalties, including contract termination, financial penalties, and reporting to relevant authorities for legal action. TANESCO will replace non-compliant entities with contractors or suppliers who meet labour standards.

### Continuous Improvement

Contractors and suppliers will undergo mandatory training on child labour prevention as part of their onboarding process. This training will focus on labour laws, recruitment practices, and the importance of maintaining a child labour-free supply chain.

TANESCO will review this procedure annually and after any reported incident of child labour to identify areas for improvement. Updates to the procedure will be made based on audit findings and changes to international labour standards.

## **6.2. Recruitment**

As specified in the **P.13 - Local Hiring Programme**, the Project will make every effort to recruit local skilled and unskilled labour from within its area of influence, where necessary and where the requirements for the type of work offered are met. Local communities will be informed about the profiles required for skilled and unskilled labour, according to project needs.

Recruitment requirements will be publicised by the Project, explaining the qualifications and documents to be submitted, and certifying that the persons to be recruited live within the local communities. The forms of communication about vacancies, profiles and requirements to be used, the receipt of CVs and training are described in the Sections 5.1 to 5.4 of the P.13 - Local Hiring Programme.

Workforce composition targets in terms of gender must be established and continuously monitored.

Worker rights and obligations will be clearly explained during recruitment.

To promote workforce diversity, gender-based and social inclusion targets will be established and monitored by both TANESCO and its contractors. All recruitment practices will adhere strictly to non-discrimination principles based on gender, ethnicity, age, disability, or sexual orientation.

## **6.3. Management of Working Conditions**

Minimum working conditions in construction sites, workers' rest areas and work fronts as set out in Tanzanian Employment and Labour Relations Act (2004) and international requirements such as IFC's Workers Accommodation: Process and Standards will be met.

The conditions shall be met in construction sites, including facilities such as cafeterias, bathrooms, changing rooms, toilets, and accommodation; in workers' rest areas on the work fronts along the route; and in the accommodation of workers from outside the region in houses to be rented (if the Contractors decide on this form of accommodation).

For detailed technical specifications on working and accommodation conditions, see also **Section 10.1.3 of the ESIA** and the standards provided in P.01 – Construction Environmental Plan (CEP).

The requirements to be met relate to minimum space; water supply; adequate sanitation and waste disposal; adequate number and distance of toilets, separating men's and women's toilets and accommodation; adequate protection from heat, cold, humidity, noise, fire and disease vector animals; adequate sanitary and washing facilities; ventilation; lighting; cleanliness; and basic medical services.

The minimum standards and conditions shall also apply to third party workers during the construction phase.

The TANESCO Supervision Team (see P.02) will inspect the other companies, ensuring compliance with the standards in construction sites, workers' accommodation facilities, subcontractors' support facilities, as appropriate.

### **6.3.1. Personnel Welfare Facilities Standards**

Adequate personnel welfare facilities should be provided and be available at all times to workers at or near the area in which they work. All facilities should be clean, dry and smoke free. Toilet facilities, washing facilities, lunchrooms, canteens, hiring halls, waiting rooms and any other personnel welfare facilities should be:

- Suitably located and of an appropriate size and construction
- Fully enclosed, if on shore
- Provided with floors, walls and ceilings that are easy to clean
- Well-ventilated and lighted, and, if necessary, heated, or air-conditioned
- Equipped appropriately for their purpose
- In the charge of a responsible person
- Maintained in a clean, sanitary, and orderly condition
- Protected against rats and other vermin
- Away from noisy operations, dust pollution and other sources of contamination, where practicable

#### Toilet Facilities Standard

The places where toilet facilities are located must undergo a permanent process of sanitization and should be kept clean and free of any odours, throughout the working day. Toilet facilities must have toilets, urinals, washbasins and showers. They should be

constructed of materials that are easily washable, in addition to ensuring privacy. The main requirements for these facilities are presented below:

- Suitable and sufficient toilet facilities should be provided and made accessible for the use of all workers.
- All toilet facilities should comply with national health and hygiene requirements.
- Toilet facilities should be located at regular intervals to cover all the work fronts.
- At least one toilet should be available for workers near the work site, where practicable.
- Toilets and urinals should be of the water-flush type, wherever possible.
- The number of toilets provided should be based on the maximum number of persons expected to work in an area.
- Each set of toilet facilities should comprise a toilet for every 25 or 30 workers. Separate toilet facilities for each sex should be provided unless the toilet facilities can only be occupied by one person at a time.
- All toilet facilities should be properly enclosed and easy to clean. A floor drain with a water seal should be provided in each toilet to facilitate flushing the floor.
- Each toilet on shore should be under cover and occupy a separate compartment installed in a special toilet facility. Each compartment should be provided with a separate door fitted with a latch on the inside.
- Urinals should be of suitable width and preferably consist of a row of stalls. If the urinals are of a smaller type (cuvettes) they should be adequately separated by side partitions.
- For personal cleansing, an adequate supply of toilet paper or, where local custom requires, water should be provided.
- Adequate washing facilities, including soap and means of drying hands, should be provided in or adjacent to each toilet area.
- Consideration should be given to the need to provide toilets equipped for use by disabled persons.

#### *Washing/Showering facilities*

- Suitable and sufficient washing facilities should be provided for all workers.
- There should be at least one washing facility for every ten workers who are likely to use them at the same time.
- There should be at least one washing facility for every ten workers who are likely to use them at the same time.
- If workers of both sexes are employed, separate washing facilities should be provided for each sex.
- Where workers are exposed to skin contamination by toxic, infectious or irritating substances, oil, grease or dust, showers should be available with a supply of hot or cold water.
- Showers should be enclosed in individual compartments, with the entrance suitably screened.
- Hooks or other facilities for clothing and towels should be provided for persons taking showers.

- An effective disinfectant should be used to destroy fungi. Regular monitoring for conditions such as legionnaires' disease should be undertaken whenever hot water is supplied.
- Washing facilities should not be used for any other purpose.

### Kitchen Standards

These are requirements to be observed in these facilities:

- Have natural and/or artificial ventilation that allows good exhaustion;
- Have walls made of masonry, concrete, wood or equivalent material;
- Have concrete, cemented or other material flooring that is easy to clean;
- Have coverage of fire-resistant material;
- Have natural and/or artificial lighting;
- Have a sink for washing food and utensils;
- Have toilet facilities that do not communicate with the kitchen, for the exclusive use of those in charge of handling food, meals and utensils, and not connected to the grease box;
- Have a container, with a lid, for garbage disposal;
- Have refrigeration equipment for food preservation;
- Be adjacent to the place for meals;
- Have electrical installations adequately protected;
- If LPG is used, the cylinders should be installed outside the environment of use, in an area permanently ventilated and covered;
- Be kept clean in good hygienic condition;
- Food preparation rooms should be designed to allow good hygiene practices, including protection against contamination between and during food preparation;
- There should be a sufficient number of hand wash basins with clean, running water and materials for hygienic drying;
- Food preparation tables must have a smooth surface and be of washable material.
- The use of aprons and hats should be mandatory for kitchen workers. Appropriate procedures for cleaning, disinfecting and storing kitchen utensils and equipment must be adopted; and
- Food and other waste shall be properly disposed of in closed collectors. Collection must be frequent, to avoid the accumulation of garbage.

### Hygiene and Comfort Conditions during Meals

Employees must be offered comfort and hygiene conditions that ensure adequate meals during working day breaks. The place for meals must be:

- Possess operating authorization issued by the competent authority, where applicable;
- Have walls that allow isolation during meals;
- Have concrete, cemented or other washable material floors;
- Have a covering protecting it from the weather;
- Have the capacity to sit all workers during mealtimes;

- Have ventilation and natural and/or artificial lighting;
- Have a washbasin installed nearby or inside;
- Have tables with smooth and washable tops;
- Have enough seats to attend the number of users;
- Have a deposit, with a lid, for debris;
- Not be located in basements of buildings;
- Not have direct communication with toilet facilities;
- Dining rooms must have adequate space per worker. Standards vary from 1 square meter to 1.5 square meters;
- There must be sinks and washbasins installed nearby or on site;
- There must be a supply of drinking water to the employees.

TANESCO and its Contractors should guide workers on the importance of adequate meals and healthy eating habits.

#### Availability of Drinking Water

Workers must be provided with drinking water under hygienic conditions in all workplaces, and the use of collective containers is prohibited. The main requirements for drinking water supply are:

- A supply of drinking and fresh water in an adequate quantity (over 1/4 (a quarter) of liter (250ml) per hour of work/man) must be guaranteed in the workplaces;
- Easily accessible drinking fountains should be available in all workplaces;
- Where running drinking water cannot be obtained, it should be supplied in hermetically sealed portable containers of suitable material and constructed so as to allow easy cleaning;
- Non-potable water for use in the workplace should be separated and a warning sign of its non-potability should be posted.

#### **6.4. Grievance Redress Mechanism**

As described in **Section 5.4.2** of the **Stakeholder Engagement Plan (SEP) (P.12)**, presented in **Annex 14**, all Contractors must implement a Grievance Redress Mechanism (GRM) for their workers, including third-party and subcontracted workers, consistent with Section C – Grievance Mechanism (paragraphs 21–23) of the World Bank ESS2. In parallel, TANESCO will establish its own contact channel to receive grievances and requests from consultants and external service providers implementing ESMP Plans and Programmes.

The GRM for workers must comply with key principles defined in the SEP and ESS2, including: accessibility, confidentiality and protection against retaliation, transparency, impartiality, timeliness, dialogue-based resolution, continuous improvement, and alignment with national legislation and human rights standards.



The mechanism must allow workers to raise complaints or concerns related to workplace issues such as labour conditions, disputes, safety risks, discrimination, harassment, violence against children, human trafficking, and SEA/SH, in a confidential and non-retaliatory manner.

#### SEA/SH-Specific Reporting Channel

In accordance with the World Bank Good Practice Note on SEA/SH, the workers' GRM must include a dedicated, confidential, and survivor-centred channel for reporting Sexual Exploitation, Abuse, and Harassment (SEA/SH). This channel must operate independently of standard grievance mechanisms and be accessible to all categories of workers.

SEA/SH grievances shall be:

- Handled by trained focal points using a survivor-centred approach, ensuring confidentiality, informed consent, dignity, and protection from re-traumatization;
- Referred—upon the survivor's consent—to qualified GBV Service Providers identified in the **GBV Action Plan (Annex 16)** for psychosocial support, legal assistance, medical attention, or shelter;
- Excluded from standard resolution timeframes, following instead the sensitive protocols outlined in the GBV Action Plan.

No written or signed complaint will be required for survivors to access support services. SEA/SH cases will be registered and tracked anonymously, strictly limiting access to confidential information. The effectiveness and integrity of the SEA/SH grievance channel will be monitored by TANESCO's Supervision Team and the designated GBV focal point.

#### GRM Procedures and Communication

Grievance channels (e.g., suggestion boxes, team leader reporting, HR meetings, hotline, WhatsApp) will be clearly communicated to all workers during induction and through ongoing E&S training. The use of the GRM must be encouraged at all times, with assurance that no worker will suffer retaliation for submitting a grievance.

TANESCO and the Contractors shall maintain an open-door policy and promote a culture of fair treatment and accountability. The GRM should include a defined response period (suggested: 10 working days), with the possibility of extension if justified—such extensions must be communicated to the complainant.

Importantly, as noted in paragraph 23 of ESS2, the existence of the GRM does not restrict the worker's access to judicial, administrative, or arbitration mechanisms or to grievance channels established through collective bargaining agreements.

The GRM must also extend to:

- Workers employed by subcontractors and primary suppliers, ensuring full inclusion across the project supply chain;
- Consultants engaged in implementing ESMP Plans and Programmes.

Workers will also be informed that they may submit complaints directly to TANESCO through a dedicated contact to be established under TANESCO's SEP. While this direct channel does not imply that TANESCO assumes contractual responsibilities, it enables oversight and the capacity to require corrective actions from Contractors or Subcontractors where labour practices present risks to workers or the Project.

### 6.5. Workers' Code of Conduct

The Contractors shall develop a Code of Conduct, with behavioural restrictions to be observed by all workers involved in the works of the Project. This Code of Conduct aims to contribute to the preservation of the environment and the health and hygiene conditions of the workers, ensure the quality of relations with the population near the works, as well as respect for the environment and environmental, social and OHS legislation, discipline, respect for the rights of workers and community regardless of gender, gender identity, sexual orientation, race, ethnic, migrant origin, disability and age. It also prohibits the consumption of alcoholic beverages and drugs, and other relevant aspects. This Code of Conduct has as a frame of reference the "World Bank Guidance Note on Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works", October 2022. This aspect of the Workers' Code is addressed in the **P.15 - Gender Based Violence Action Plan (Annex 16)** and further supported by **Section 10.2.3** of the ESIA, which outlines mitigation strategies and community protection measures related to GBV risks during construction.

To ensure adequate dissemination of the Code of Conduct, the Contractors shall include it in the content of induction training and environmental and social training for workers foreseen in this Plan (see next Section), and it shall be posted in strategic locations in the construction sites and other support areas.

The Code of Conduct must be adopted by all workers, including those of the main Contractors, subcontractors and suppliers.

The minimum requirements contained in the Code of Conduct are:

#### General aspects

- The conduct of employees before, during and after working hours shall be exemplary and in strict accordance with the law. In particular, a polite and respectful relationship with the rights of all persons shall be maintained; hostile behaviour towards the local community shall not be accepted, but respect for local values, customs and culture shall be shown at all times.
- Discrimination on the basis of: age, gender, gender identity and sexual orientation, race, ethnicity, nationality, disability-dysfunctional status, teenage mothers, and religious beliefs is strictly prohibited.

- All workers must wear credentials that allow easy identification of their names, position and the company they work for.
- It is strictly forbidden to carry weapons, consume alcoholic beverages or drugs, as well as possess pornographic materials (images, videos, magazines, etc.), make transactions with adults for sexual services, or with children and adolescents in all areas of the Project.
- The sale of goods within or near the boundaries of the construction site will be controlled. For this purpose, a register of traders will be kept and the number of persons allowed to perform this service will be limited.
- Any damage to construction site facilities and/or third-party property will be reported in a timely manner to the direct supervisor.
- Graffiti on the construction site facilities is prohibited, as well as any other form of vandalism that affects the property of the Contractors, TANESCO or third parties.
- No person employed by the Contractors may make statements related to the Project to the press or any other media, as these are only permitted to TANESCO or the SEP team.
- All employees must report to their supervisor immediately any conduct that violates the Code of Conduct in general.

#### Gender-based violence (GBV) and of sexual exploitation and abuse and sexual harassment (SEA/SH)

The Workers' Code of Conduct (CoC) must incorporate explicit and binding provisions on the prevention and response to Gender-Based Violence (GBV), including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), as outlined in the **P.15 - GBV Action Plan (Annex 16)**. Key aspects include: (i) strict prohibition of all forms of GBV/SEA/SH by project workers, whether towards community members or fellow workers; (ii) the obligation to treat all persons with dignity and respect, regardless of gender, age, or status; (iii) mandatory participation in GBV/SEA/SH awareness and prevention training; (iv) requirement to report observed or suspected SEA/SH behavior through designated and confidential channels; and (v) immediate disciplinary measures, including dismissal and legal action, for any breach of the CoC related to SEA/SH. The CoC must clearly inform workers that acts of SEA/SH constitute gross misconduct and are grounds for contract termination. Furthermore, workers must acknowledge in writing that they understand the SEA/SH standards, reporting obligations, and available survivor-centered response mechanisms. These provisions shall be reinforced through induction and refresher training, in line with the survivor-centered protocols and referral pathways detailed in the GBV Action Plan.

#### Occupational Health and Safety (OHS)

- All persons employed must comply strictly with occupational safety standards<sup>1</sup>. Any failure to comply with these standards will be considered a serious offence by the Contractors' Occupational Safety Coordinator.
- All persons employed must comply with the Covid-19 prevention rules.

<sup>1</sup> As per detailed in P.17 - Occupational Health and Safety Management Programme.

- Any person employed shall report to the immediate Safety Supervisor the existence of any conduct that is unsafe or does not conform to health and safety standards.
- Medical examinations shall be carried out for admission, dismissal and for any change of job function.
- Any employee showing symptoms of illness should report them immediately.
- All employees must agree to take vaccinations if necessary.
- All employees must have good personal hygiene habits. The disposal of waste outside the designated waste containers is not permitted. Toilets must be used on the facilities.
- Heavy machinery drivers and equipment operators working outside the construction site facilities shall strictly follow road signs and traffic regulations. And they must respect the prohibition of littering on the roads during the journey.
- Transporting third parties in work vehicles during construction related activities is strictly prohibited. Third party transport is only permitted with the express authorisation and under the direct responsibility of the Contractors' Contract Manager and/or Resident Engineer.
- The use of construction service roads, speed limits and any instructions contained in signage must be complied with at all times.
- As part of the health prevention education campaigns that will be implemented with project workers during construction, special emphasis will be placed on the risks of sexually transmitted diseases. TANESCO's contractors will distribute condoms free of charge to their workers during the execution of these educational campaigns.

#### Environmental and cultural heritage

- Fishing and hunting of wildlife, as well as unauthorised cutting of vegetation is strictly prohibited. Any worker found to be carrying out such actions will be dismissed immediately.
- Any visual contact with local terrestrial wildlife within the Project areas must be reported without delay to the immediate supervisor for appropriate action to be taken by the environmental monitoring team.
- Feeding of local wildlife is prohibited.
- Keeping any type of domestic animal in the Project areas is prohibited.
- Walking in sensitive environmental areas outside the Project areas is prohibited.
- Lighting small fires or initiating open burning is strictly prohibited.
- Any archaeological, paleontological or historical remains or relics found during construction must be preserved and reported to the immediate supervisor without delay. This situation shall trigger the Chance Findings Procedure that is part of the Construction Environmental Plan (CEP) (P.01).

#### General safeguards

- Some situations or aspects not foreseen above may arise during the process of execution of the works. In all these situations, diligent conduct is expected from workers, following the same ethical standards that guided the preliminary elaboration of this Code of Conduct.



## 6.6. Environmental and Social Education for Workers

All topics covered in this section, including environmental, social, and occupational health and safety aspects, shall be addressed during workers' induction process, which is mandatory for all personnel prior to engaging in project activities. The induction will also include a thorough explanation of the Workers' Code of Conduct, which outlines behavioral standards, expectations regarding community relations, and a zero-tolerance policy toward discrimination, harassment, and SEA/SH. The purpose of the induction is to ensure that all workers—regardless of employment modality—clearly understand their rights, obligations, and the Project's commitments to safe, fair, and respectful working conditions, as defined under ESS2.

The E&S education for workers' induction will cover the following content:

- Summary of relevant E&S legislation, with emphasis on prohibitions on unauthorised vegetation cutting, fishing, hunting of wild animals, plant collection, damage to historical, cultural, archaeological and palaeontological heritage, noise emission;
- Mitigation measures for negative impacts and risks and environmental control instructions contained in the ESMP, explained in simple and direct language, to inform about good practices to be used and supervised in the works;
- Fire prevention;
- Importance of preventing and controlling environmental pollution;
- Solid waste management;
- Recognition of poisonous animals and procedures in case of bites;
- Archaeological, historical, cultural and paleontological heritage - awareness of the need for preservation, notions for identification and actions to be taken in case of chance findings;
- Explanation of how to act in case of emergencies such as accidents at work, accidental fire, among others;
- Possession and use of weapons in general - firearms and bladed weapons, except when required by the function performed;
- Speed limits on access roads and paths;
- Presentation of the Workers' Code of Conduct and rules on relations with the community in the area of influence;
- Sex education and communicable diseases;
- Risks of sexual and gender-based violence related to the Project, local customs, appropriate interaction with communities;
- Prohibition of sexual and gender-based violence/harassment;
- Channels available for reporting breaches of the Code of Conduct, especially related to: harassment, sexual, gender-based, gender identity and sexual orientation violence, sexual exploitation, and how they will be handled;
- Description of the procedures for environmental supervision of the works, focusing on the system for managing non-conformities;
- Use of personal and collective protective equipment (PPE and CPE);
- Among other topics.



In addition to initial worker's induction, E&S education and awareness sessions covering all key topics of this Labour Management Procedures (LMP)—including OHS, workers' rights, SEA/SH prevention, code of conduct, grievance procedures, environmental safeguards, and community relations—shall be conducted every four (4) months during the construction phase, in the form of standard one-hour modules. These refresher trainings are mandatory for all workers, including those employed by subcontractors and service providers, and must be documented through attendance records and brief post-training evaluations.

## 7. Performance Indicators

The LMP indicators should manage/monitor the following key issues:

Measure	Indicators
Human Resources Policy	<ul style="list-style-type: none"> <li>Existence of an approved HR Policy aligned with ESS2 and national legislation.</li> <li>% of contractors and subcontractors with HRPs reviewed and approved by TANESCO before mobilization.</li> </ul>
Recruitment and Local Employment	<ul style="list-style-type: none"> <li>% of workers recruited locally (from project-affected communities).</li> <li>% of women and members of sexual/gender minorities among total workforce.</li> <li>% of unskilled and semi-skilled roles filled by local workers.</li> </ul>
Management of Working Conditions	<ul style="list-style-type: none"> <li>Number of non-conformities (NCs) recorded through the P.02 (<i>Working Conditions Monitoring Tool</i>).</li> </ul>
Grievance Mechanism	<ul style="list-style-type: none"> <li>Number of complaints/suggestions received through suggestion boxes installed in construction sites (total and SEA/SH-specific)</li> <li>Number of complaints/suggestions responded to/resolved</li> <li>Number of complaints/suggestions responded to within the time frame</li> <li>Number of documented community complaints related to labour influx or worker behavior.</li> </ul>
Workers' Code of Conduct	<ul style="list-style-type: none"> <li>Evidence of inclusion of the Code of Conduct as an annex to contracts signed with each Contractor</li> <li>Evidence of dissemination of the Code of Conduct in the construction sites</li> <li>Number of workers trained in the content of the Code of Conduct in relation to the total number of workers hired</li> <li>Number of incidents reported involving misconduct towards community members</li> </ul>
E&S Education for Workers	<ul style="list-style-type: none"> <li>Number of workers participating in E&amp;S Education events, including induction, in relation to total number of workers</li> <li>% of workers trained on GBV/SEA/SH prevention and response</li> <li>Number of refresher trainings delivered in the reporting period</li> <li>% of workers receiving training on STIs/HIV prevention and personal hygiene</li> <li>Number of awareness sessions held on communicable diseases</li> <li>Number of informational materials distributed (e.g. leaflets, posters)</li> <li>% of workers trained on community behavior protocols and cultural sensitivity</li> </ul>

Measure	Indicators
	<ul style="list-style-type: none"> <li>• Number of workers trained on protocols for community interaction</li> <li>• Number of OHS training sessions conducted by contractor</li> </ul>

## 8. Reports and Documentation

Contractors shall detail the procedures of their Human Resources Policies, which must be submitted to TANESCO for review and approval for further action.

The Contractors' compliance with the procedures shall be evidenced by their monthly reports to be prepared during construction, which shall include:

- Data relating to local labour recruitment, indicating:
  - Number of workers recruited, specifying the percentage of local and non-local recruitment and demobilisation;
  - Number of female and other sexual minority workers recruited, in relation to total recruitment.
- Data related to the training of workers:
  - Records and evidence of training provided to hired workers (attendance list, photographic record, among others);
  - Number of workers trained for prevention and action in situations of leaks and spills of hazardous products;
  - Number of workers trained in the Chance Findings Procedure;
  - Number of workers trained in environmental training modules in relation to the total number of workers hired;
  - Number of workers trained on the content of the Code of Conduct.
- Records of complaints/suggestions received through the Workers' Grievance Mechanism and responses to them;
- Records of complaints/suggestions received through the Workers' Grievance Mechanism and responses to them.
- Records of participation in E&S education for workers' events.

Compliance will also be evidenced through periodic inspections and verification of labour documentation by the TANESCO Supervision Team.

### Serious Incident Report

In case of any serious incident or accident—including but not limited to fatalities, life-threatening injuries, cases of SEA/SH, major labour unrest, or significant environmental and social impacts—TANESCO shall notify the World Bank within 48 hours of becoming aware of the event. Notification shall include initial details on the nature of the incident, location, parties involved, and immediate response actions. Within 10 business days, TANESCO shall submit a detailed incident report, including a root cause analysis, corrective and preventive actions, and timelines for implementation. This protocol will align with the Environmental and Social Incident Response Toolkit (ESIRT) and the

provisions of the Environmental and Social Commitment Plan (ESCP) once it is finalized and disclosed.

## 9. Schedule

The Human Resources Policy procedures should be developed and approved by TANESCO and World Bank prior to the start of construction, as should the detailed Code of Conduct. The implementation of the measures will last throughout the construction phase.

E&S education for workers shall be implemented after the formation of the Contractors' teams, prior to the commencement of construction and every four months during construction, in a standard module of one (1) hour duration.

The labour recruitment measures shall commence at the planning stage and may be extended to much of the construction phase while the civil works are still in progress.

TANESCO should also develop its Human Resources Policy for application throughout the operational phase of the Project.

## 10. Budget

The estimated costs related to the implementation of this Labour Management Procedures (LMP)—including the Human Resources Policy, Workers' Code of Conduct, training, grievance mechanisms, working condition standards, and environmental and social education for workers—are detailed in **Chapter 12** of the ESIA (Resource Evaluation or Cost Benefit Analysis). These costs are part of the overall environmental and social programs planned for the construction phase and are considered within TANESCO's project implementation budget. The total cost of reviewing and monitoring the implementation of the LMP is estimated at **USD 80,000**.

## **ANNEX A – Template (i.e., minimum content) for Human Resources Policy (HRP)**

This template outlines the minimum contents required for a Human Resources Policy (HRP) to be developed by all Contractors and Subcontractors engaged in the UTIP Project. The document must align with Tanzanian labour laws, the IFC Performance Standards, and the World Bank Environmental and Social Standard 2 (ESS2). The HRP shall be submitted to TANESCO for review and approval prior to workforce mobilization.

### **1. Introduction and Objectives**

- Purpose of the HR Policy
- Commitment to national legislation and international labour standards (ESS2, ILO conventions)

### **2. Scope of Application**

- Applicability to all employees, including subcontracted and supply chain workers
- Statement on inclusion of all genders and vulnerable groups

### **3. Employment Practices**

- Recruitment procedures (including prevention of discrimination)
- Job classification, wages, and benefits
- Working hours, rest periods, and leave entitlements

### **4. Non-Discrimination and Equal Opportunity**

- Statement prohibiting discrimination based on gender, ethnicity, age, religion, disability, sexual orientation, or other status
- Equal pay for equal work policy
- Promotion of female participation

### **5. Occupational Health and Safety (OHS)**

- Commitment to implementing an OHS Management System
- Training and supervision of workers
- Accident and incident reporting procedures

### **6. Emergency Preparedness and Response (EPR)**

- Basic emergency procedures
- Worker training and drills
- Coordination with site management and medical teams

## **7. Grievance Mechanism for Workers**

- Procedures for confidential reporting
- Protection against retaliation
- Timeline for resolution

## **8. Workers' Code of Conduct**

- Expected behavior in the workplace and communities
- Prohibition of sexual harassment, violence, exploitation, and intimidation
- Disciplinary measures for violations

## **9. Prevention of Child and Forced Labour**

- Minimum age requirements
- Age verification procedures
- Zero-tolerance for forced or trafficked labour

## **10. Training and Capacity Building**

- Induction training for all workers
- Periodic refresher training
- Specialized modules (e.g., SEA/SH prevention, cultural awareness)

## **11. Labour Influx and Workers' Camps**

- Mitigation measures for social and environmental risks
- Compliance with Workers' Accommodation Guidelines (IFC/EBRD)

## **12. Monitoring and Reporting**

- Internal monitoring systems
- Periodic reporting to TANESCO
- Recordkeeping requirements

## **13. Sign-off and Acknowledgement**

- Declaration of understanding and compliance
- Signatures from employer and worker

Note: This HR Policy Template must be adapted to the specific context of the contractor's operations and workforce. TANESCO reserves the right to request revisions to ensure full alignment with project-level requirements and safeguard policies.

## **ANNEX B – Template for Labour Influx Management Plan (LIMP)**

This template is intended to guide the preparation of Labour Influx Management Plans (LIMPs) by contractors and subcontractors engaged in the UTIP Project. The plan must be aligned with World Bank ESS2 and ESS4, the GBV Action Plan (**Annex 16**), the Stakeholder Engagement Plan (SEP – **Annex 14**), and the Environmental and Social Management Plan (ESMP – **ESIA Chapter 10**). It must be submitted to TANESCO for approval and to the World Bank for clearance prior to mobilization.

### **1. Introduction**

- Objective of the Labour Influx Plan
- Reference to project scope and location
- Description of the contractor's scope of work and expected workforce size

### **2. Estimated Workforce and Influx Profile**

- Total number of workers to be mobilized
- Classification by skill level (skilled, semi-skilled, unskilled)
- Geographic origin (local, national, international)
- Expected timing and duration of mobilization

### **3. Local Context Assessment**

- Overview of host communities and demographic characteristics
- Sensitivity analysis (e.g., presence of vulnerable groups, cultural practices)
- Potential social tensions or risks from workforce influx

### **4. Risk Identification and Mitigation Measures**

- Identification of key risks (e.g., SEA/SH, communicable diseases, resource competition)
- Proposed mitigation measures:
  - Worker Code of Conduct
  - Awareness campaigns in communities
  - Workers' accommodation policies and rules
  - Monitoring of worker behavior

### **5. Workers' Accommodation and Services**

- Number and location of workers' camps
- Site layout and facilities (water, sanitation, waste management, lighting, etc.)
- Security arrangements
- Provisions for health care, food, and recreational activities



## **6. Community Engagement and Grievance Redress**

- Coordination with community leaders and local authorities
- Procedures for information disclosure and community consultations
- Grievance mechanism for community members related to labour influx

## **7. Roles and Responsibilities**

- Contractor responsibilities
- Subcontractor responsibilities
- Oversight by TANESCO and the Supervision Team

## **8. Monitoring and Reporting**

- Indicators to track implementation of influx mitigation measures
- Frequency and format of reporting
- Procedures for non-compliance and corrective actions

## **9. Annexes**

- Maps of camp locations
- Sample Worker Code of Conduct
- Community consultation log
- Risk matrix

Note: Contractors are required to adapt this template to the specific context of their worksite. TANESCO and the World Bank reserve the right to request revisions before final approval.