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MINISTRY OF POSTS AND TELECOMMUNICATIONS (MoPT)

WARDIP SOP II–Liberia Project Implementation Unit (PIU)

Western Africa Regional Digital Integration Program – Series of Projects II (WARDIP SOP II), Liberia
World Bank Project ID: P500628

LABOR MANAGEMENT PROCEDURES (LMP)

Prepared in accordance with the World Bank Environmental and Social Framework (ESS2) and the LMP Template for Liberia

Draft LMP – Deliverable 2 under Contract No. 001
Revised LMP addressing World Bank quality assurance comments, for World Bank clearance – 3 November 2026

Status: revised LMP addressing the World Bank quality assurance comments and incorporating the decisions of the PIU. Following World Bank clearance, the MoPT will disclose the LMP in Liberia and on the World Bank website and adopt it.

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ACRONYMS

C-ESMP	Contractor's Environmental and Social Management Plan
C-LMP	Contractor's Labor Management Plan
CBL	Central Bank of Liberia
CERC	Contingent Emergency Response Component
CLS	Cable Landing Station
CSIRT	Computer Security Incident Response Team
DWA	Decent Work Act, 2015
E&S	Environmental and Social
EHS	Environmental, Health and Safety
EPA	Environmental Protection Agency of Liberia
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESIRT	Environmental and Social Incident Response Toolkit
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESRM	Environmental and Social Risk Management
ESS	Environmental and Social Standard
GBV	Gender-Based Violence
GM	Grievance Mechanism
GRC	Grievance Redress Committee
GRS	Grievance Redress Service (World Bank)
HIV/AIDS	Human Immunodeficiency Virus / Acquired Immune Deficiency Syndrome
HR	Human Resources
HSE	Health, Safety and Environment
ICNIRP	International Commission on Non-Ionizing Radiation Protection
ICT	Information and Communication Technology
IDA	International Development Association
IEC	Information, Education and Communication
ILO	International Labour Organization
LMP	Labor Management Procedures
LNP	Liberia National Police
LRA	Liberia Revenue Authority
LRREN	Liberia Research and Education Network
LTA	Liberia Telecommunications Authority
LTC	Liberia Telecommunications Corporation
M&E	Monitoring and Evaluation
MFDP	Ministry of Finance and Development Planning
MGCSP	Ministry of Gender, Children and Social Protection

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MIS	Management Information System
MoCI	Ministry of Commerce and Industry
MoL	Ministry of Labor
MoPT	Ministry of Posts and Telecommunications
O&M	Operation and Maintenance
OHS	Occupational Health and Safety
PAD	Project Appraisal Document
PDO	Project Development Objective
PFMU	Project Financial Management Unit (MFDP)
PIM	Project Implementation Manual
PIU	Project Implementation Unit
PKI	Public Key Infrastructure
PPCC	Public Procurement and Concessions Commission
PPE	Personal Protective Equipment
RF/EMF	Radio-frequency / Electromagnetic Fields
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
SOC	Security Operations Center
SOP	Series of Projects
SPV	Special Purpose Vehicle (project company for the submarine cable)
VAC	Violence Against Children
WAEMU	West African Economic and Monetary Union
WARDIP	Western Africa Regional Digital Integration Program
WBG	World Bank Group

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EXECUTIVE SUMMARY

The World Bank, through an International Development Association (IDA) credit of US$50.0 million, is supporting the Government of Liberia, through the Ministry of Posts and Telecommunications (MoPT), to implement the Liberia part of the Western Africa Regional Digital Integration Program – Series of Projects II (WARDIP SOP II–Liberia; P500628). In Liberia, it will finance a submarine fiber-optic cable landing at Big Fanti Town and a cable landing station (CLS) in Buchanan, together with cybersecurity, digital skills, digital payments and project management. As the private sector-led Special Purpose Vehicle (SPV) envisaged in the Project Appraisal Document (PAD) has not been established, the MoPT will award all contracts.

This Labor Management Procedures (LMP) document sets out how project workers will be recruited, managed and protected in line with Liberian law and the World Bank Environmental and Social Standard 2 (ESS2). It applies to all project workers and is a living document that will be updated as contractors and workforce numbers are confirmed. It will be disclosed on the MoPT website (https://www.mopt.gov.lr), the Executive Mansion (e-Mansion) website, the Public Procurement and Concessions Commission (PPCC) website and the World Bank external website, with hard copies at the MoPT/PIU office in Monrovia, the Grand Bassa County Service Center and, once contractors are mobilized, at all worksites, and adopted within one month after Bank review and clearance.

Overview of labor use on the project

The project will engage:

- **Direct workers:** staff and individual consultants of the Project Implementation Unit (PIU) at the MoPT.
- **Contracted workers:** workers of contractors, subcontractors, consulting firms and service and training providers.
- **Primary supply workers:** workers of suppliers of essential goods, such as fiber-optic cable, network equipment and aggregates.
- **Community workers:** none are anticipated.

Indicatively, 14 direct workers (PIU staff, plus individual consultants) and, at the peak of construction, 200–350 contracted workers will be engaged in Monrovia, in Buchanan and Big Fanti Town, and on the marine cable route. Both national and international workers will be engaged. Migrant workers will mainly be international marine and cable crews (countries of origin to be declared in the cable contractor's Labor Management Plan (C-LMP) once it is selected) and skilled workers from other counties where the skills are not available in Grand Bassa County; other workers will be recruited locally, with priority to the project communities (Table 9).

Assessment of key potential labor risks

The main risks are serious occupational health and safety (OHS) incidents (trench collapse, marine and diving work, lifting, work at height, electrical hazards, road traffic); casual work without written contracts, late pay and excessive hours; non-transparent local hiring; child and forced labor in informal hiring and aggregate supply; labor influx, sexual exploitation and abuse and sexual harassment (SEA/SH) and communicable diseases; unequal terms for international crews; and SEA/SH and discrimination in training activities.

Overview of labor legislation: terms and conditions

All project work shall comply with ESS2, international labor standards ratified by Liberia and Liberian law, particularly the Decent Work Act, 2015 and the Children's Law, 2011 (gaps addressed in Annex 1).

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Responsible staff

The PIU Project Coordinator, who is accountable for the LMP, the Finance Assistant and the Procurement Specialist are in post, along with a civil servant assigned by the MoPT to support procurement. An Environmental Specialist and a Social Safeguards and Gender-Based Violence (GBV) Specialist joined the PIU in October 2026 and assumed full responsibility for their LMP roles on 2 November 2026 (Environmental and Social Commitment Plan (ESCP) action A.1); in line with the ESCP, the latter covers both social safeguards and GBV. The five planned posts (Section 5) and three drivers will be recruited from December 2026; the staffing plan and organogram will be approved in January 2027 and fully operational by March 2027. Contractors will provide evidence of the appointment of Health, Safety and Environment (HSE), Human Resources (HR) and Community Liaison Officers as part of the contract bidding process.

Policies and procedures

All contractors and third parties will sign a Code of Conduct and apply the project's workplace policies (Section 6 and Annex 6). The Codes of Conduct in the Environmental and Social Management Framework (ESMF) have been adapted (Annexes 2 and 3) and will be signed by all PIU staff, consultants, contractors, subcontractors, service providers and their workers.

Age of employment

The project minimum age is 18 years for all project work, whether hazardous or not; no person under 18 will be engaged. Employers will verify every worker's age before engagement (birth certificate, national identity card, passport or voter card or, where no document exists, at least two other sources such as school records or a medical assessment), record it in the employer register, and remove and refer any child found working to the appropriate authorities (Section 7).

Terms and conditions

All direct and contracted workers, including casual workers, will receive a written contract before commencing work, in the official language and (if required), translated in a language they understand, stating hours, pay, leave and notice, consistent with the Decent Work Act, 2015 and ESS2.

Grievance mechanism

A confidential two-tier grievance mechanism for project workers, separate from the project grievance mechanism, will be in place before any further workers are engaged (ESCP 2.3). No works contractor has yet been mobilized; the PIU staff currently engaged use the existing project grievance mechanism in the Stakeholder Engagement Plan (SEP), adapted for workers, and the PIU E&S team will train the PIU staff and Grievance Redress Committee (GRC) members concerned by December 2026 (Section 9). Once mobilized, each contractor will establish a site-level Workers' Grievance Redress Mechanism (SEP Section 5.7). SEA/SH, GBV and violence against children (VAC) complaints follow a survivor-centered referral pathway (SEP Section 5.9) and are not mediated. Workers may also use statutory channels and the World Bank Grievance Redress Service.

Contractor management

The PIU will annex the LMP requirements to every contract, approve contractors' labor and OHS plans before works start, and track their compliance with their contractual obligations through a contract management and responsibility matrix.

Community workers and primary supply workers

The PIU has confirmed that no community labor or volunteer work is planned; should it become necessary (for example, under the Contingent Emergency Response Component (CERC)), Section 11 will apply and the LMP will be updated first. Primary suppliers will be screened and monitored for child labor, forced labor and serious safety issues, and replaced where problems cannot be remedied.

1. BACKGROUND

This Labor Management Procedures (LMP) document has been developed for the following project:

- **Project:** Western Africa Regional Digital Integration Program – Series of Projects II, Liberia part (WARDIP SOP II–Liberia; P500628), financed by an IDA credit of US$50.0 million (Project Appraisal Document (PAD) Report No. PADHI01072, February 2026; expected closing date 31 October 2031). The environmental and social risk classification of the project is rated Substantial, including a Substantial SEA/SH risk rating.
- **Project Development Objective (PDO):** to increase broadband access, financing and usage in participating countries and to enable the environment for cross-border digital services in Western Africa.
- **Project components (Liberia allocations, as set out in the PAD, Table 1 and paragraphs 24–40; total US$50.0 million):**
    - **Component 1 – Building Policy and Financing Pathways for West African SDM (Single Digital Market) (US$11.5 million, West African Economic and Monetary Union (WAEMU) only):** implemented by WAEMU – legal and regulatory environment and institutional capacity for a West African SDM, capital markets instruments for financing digitization, and support to the implementation of the Cotonou Declaration in WAEMU countries (Subcomponents 1.1–1.4). There is no Liberia allocation and no activity or works in Liberia.
    - **Component 2 – Connectivity Market Development and Integration (US$27.0 million for Liberia):** Subcomponent 2.1 – technical assistance to revise the Telecommunications Act, 2007 and associated regulations and to develop and implement a dig-once and infrastructure-sharing policy; a national spectrum management policy and digital migration; regulatory tools for the Liberia Telecommunications Authority (LTA), such as a geospatial mapping system of telecom infrastructure; internet governance (oversight of Liberia's top-level domain and reform of the Liberia Internet Exchange Point governance); and assessment and reform of the Universal Access Fund. Subcomponent 2.2 – a new submarine cable system and cable landing station (CLS), operated on an open-access basis and planned in the PAD through a public–private partnership in which Liberia participates as a minority shareholder in a national special purpose vehicle (SPV), with the cable landing at Big Fanti Town and the CLS in the Liberia Telecommunications Corporation (LTC) compound in Buchanan; legal and transaction advisory support and capacity building for the SPV; technical assistance on alternative international and cross-border routes, including the optical fiber on the Côte d'Ivoire–Liberia–Sierra Leone–Guinea (CLSG) power line; and strengthening of the Liberia Research and Education Network (LRREN) and its integration into the West and Central African Research and Education Network (WACREN).
    - **Component 3 – Data Market Development and Integration (US$5.5 million for Liberia, Subcomponent 3.1 only):** regulations and guidelines for the Cybercrime Law and the Data Protection Bill, and data-rights and cybersecurity-hygiene awareness campaigns; establishment of the national Computer Security Incident Response Team (CSIRT), update of the cybersecurity legal and governance framework and development of a cybersecurity-skilled workforce, including through public–private partnerships to operationalize the CSIRT and deliver a managed Security Operations Center (SOC) and training services; and the legal framework and platforms for electronic signatures, public key infrastructure

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(PKI) and secure authentication. Subcomponent 3.2 (data enablers) is implemented in Benin only.

- **Component 4 – Online Market Development and Integration (US$12.5 million for Liberia):** Subcomponent 4.1 – digital skills for jobs and product-building, paired with employer-linked internships and placements, and the DigiLeap digital entrepreneurship program for youth-led entrepreneurs (ages 18–45), delivered through competitively selected incubators and accelerators and building on the Liberia Investment, Finance and Trade project and the Small Business Administration of the Ministry of Commerce and Industry (MoCI); Subcomponent 4.2 – digitization of government payments, a centralized interface for ministries to connect to the Fast Payment System/Switch and integration of the domestic switch with regional systems, merchant payment and agent networks, and capacity building of the Central Bank of Liberia (CBL), Liberia Revenue Authority (LRA), Ministry of Finance and Development Planning (MFDP) and MoPT; Subcomponent 4.3 – revision of the national information and communication technology (ICT) framework for e-commerce, digital contracting and online consumer protection, MoPT capacity for e-commerce policy, and a national digital postal policy and roadmap.
- **Component 5 – Project Management and Implementation Support (US$5.0 million for Liberia):** PIU staffing and expert consultants, fiduciary management and independent audits, monitoring and evaluation (M&E), compliance with the World Bank Environmental and Social Framework (ESF) (including security and GBV risks), stakeholder and citizen engagement, and grievance redress.
- **Component 6 – Contingent Emergency Response Component (CERC) (US$0):** rapid reallocation of uncommitted funds in an eligible emergency, subject to a CERC Manual, an Emergency Action Plan and the E&S requirements agreed in it and in the ESCP.

- **Client:** The Government of Liberia, through the MoPT and its WARDIP SOP II–Liberia PIU, with financial management by the Project Financial Management Unit (PFMU) of the Ministry of Finance and Development Planning (MFDP). The SPV envisaged in the PAD has not been established; the MoPT will award all project contracts, including the cable works, and the LMP requirements will form part of the contract annexes signed by contractors.

The development and implementation of an LMP is a requirement of ESS2 (Labor and Working Conditions) of the ESF. ESS2 aims to:

- Promote safety and health at work.
- Promote the fair treatment, social inclusion, non-discrimination, and equal opportunity of project workers.
- Protect project workers, including vulnerable workers such as women, persons with disabilities, youth of working age and migrant workers, as well as contracted workers, community workers and primary supply workers, as appropriate.
- Prevent the use of all forms of forced labor and child labor.
- Support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law.
- Provide project workers with accessible means to raise workplace concerns.

Key ESS2 requirements. The main requirements of ESS2 that this LMP puts into practice are summarized below:

- **Working conditions and management of worker relationships (ESS2, paras. 9–16):** written labor management procedures; clear and understandable terms and conditions of employment

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(contract, wages, hours, leave, notice); non-discrimination and equal opportunity; and respect for workers' organizations – Sections 6 and 8.

- **Protecting the work force (paras. 17–20):** a minimum age of employment, no hazardous work for anyone under 18, and prohibition of forced labor and trafficking – Section 7 and Annex 6.
- **Grievance mechanism (paras. 21–23):** an accessible grievance mechanism for all direct and contracted workers to raise workplace concerns, without retaliation – Section 9 and Annex 12.
- **Occupational health and safety (paras. 24–30):** identification of hazards, preventive and protective measures, training, personal protective equipment (PPE), incident reporting and emergency preparedness, in line with the World Bank Group (WBG) EHS Guidelines – Section 3 and Annex 11.
- **Contracted workers (paras. 31–33):** reasonable efforts to ascertain that third parties are legitimate and reliable, contractual requirements and monitoring of contractors' compliance – Section 10.
- **Community workers (paras. 34–38):** voluntary engagement, appropriate terms, OHS measures and screening for child and forced labor where community labor is used – Section 11.
- **Primary supply workers (paras. 39–42):** assessment and management of the risks of child labor, forced labor and serious safety issues at primary suppliers – Section 12.

This LMP has been prepared as a stand-alone instrument under ESCP actions 1.1.6 and 2.1. It follows the World Bank LMP Template for Liberia and is based on the PAD, the ESCP, the Environmental and Social Management Framework (ESMF, December 2025), national legislation and information provided by the PIU. Because contractors and workforce numbers are not yet confirmed, workforce figures are indicative. The LMP will be updated once contractor and workforce numbers are confirmed, if an SPV is established, if the CERC is activated, following serious incidents, or when national law changes. Following World Bank review and clearance, it will be disclosed in Liberia – on the MoPT, e-Mansion and PPCC websites and in hard copy at the MoPT/PIU office in Monrovia, the Grand Bassa County Service Center and, once contractors are mobilized, at all worksites – and on the World Bank external website, and adopted by the MoPT. Contractors will prepare Contractor's Labor Management Plans (C-LMPs) consistent with this LMP before mobilization (ESCP 1.1.8).

This LMP applies to all project workers, whether full-time, part-time, temporary, seasonal, or migrant workers.

2. OVERVIEW OF LABOR USE ON THE PROJECT

2.1. Project workforce need by project phase

During the lifespan of the project, it is anticipated that the project will engage the following types of workers (ESS2, paragraph 3):

- **Direct workers:** people employed or engaged directly by the MoPT to work specifically on the project, i.e., PIU staff and individual consultants. Civil servants working on the project remain subject to the Civil Service Standing Orders; for them only the ESS2 provisions on OHS and on child and forced labor apply, unless they are legally transferred to the project.
- **Contracted workers:** people employed or engaged through third parties – contractors and subcontractors (including the cable supply and installation contractor), consulting firms, supervision consultants, service providers and training providers – to perform work related to core functions of the project, regardless of location.

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- **Primary supply workers:** people employed or engaged by primary suppliers, i.e., suppliers that provide goods or materials essential for the core functions of the project directly and on an ongoing basis (for example, fiber-optic cable, network equipment, sand, gravel and cement). Other vendors are not primary suppliers.
- **Community workers:** not anticipated (the PIU has confirmed that no community labor or volunteer work is currently planned under any component). Local people recruited by contractors are contracted workers with written contracts.

It is estimated that the project will engage 14 direct workers (PIU staff), plus individual consultants engaged as needed, and, at peak, about 200–350 contracted workers. Primary supply workers cannot yet be quantified and will be identified through supplier screening (Section 12). The largest workforce will be engaged during construction of the cable landing, beach manhole, terrestrial ducts and CLS in Buchanan. The workforce will be engaged as follows:

Table 1 – Worker categories by project phases

Project phase or cycle	Type of worker	Estimated no. of workers
Phase 1 – Preparation (PIU set-up, studies, transaction advisory, environmental and social impact assessment and management plan (ESIA/ESMP), route surveys, procurement)	Direct workers	14: in post (4) – Project Coordinator, Finance Assistant, Procurement Specialist and one civil servant seconded by the MoPT for procurement support; joined in October 2026, in full role since 2 November 2026 (2) – Environmental Specialist and Social Safeguards and GBV Specialist (ESCP A.1); planned (8) – Communication Specialist, M&E Specialist, National Procurement Specialist, Administrative Assistant, Office Assistant and three drivers (recruitment from December 2026; all filled by March 2027). Individual consultants will be engaged as needed.
	Contracted workers	20–40: personnel of transaction and legal advisory firms, ESIA and survey firms, and marine route survey crews
	Primary supply workers	None anticipated
Phase 2 – Implementation / construction (marine cable installation, beach manhole, terrestrial ducts, CLS, information and communication technology (ICT) installation, Components 3–4)	Direct workers	14 (as above), plus individual consultants as needed
	Contracted workers	200–350 at peak: CLS, beach manhole and terrestrial civil and electrical works, including site security and drivers (80–150); supervision consultant (5–10); marine installation crew, mostly international and short-term (50–80); ICT integrators and CSIRT/SOC operator (15–30); training providers and incubators (30–50); office security, drivers and support staff in Monrovia (20–30)
	Primary supply workers	Not yet quantifiable: workers of suppliers of fiber-optic cable, network equipment, sand, gravel and cement
Phase 3 – Operation (operation and maintenance (O&M) of the CLS and network; SOC operations; to project closing)	Direct workers	Up to 14 (PIU staff to project closing)
	Contracted workers	25–50: CLS O&M technicians, SOC analysts, security guards
	Primary supply workers	Limited: spare parts and equipment suppliers

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Note: Direct worker numbers reflect the PIU positions reported by the PC in October 2026 and have been confirmed with the MoPT. The PIU has advised that workforce numbers will be established through the final engineering designs and contractors' staffing and mobilization plans. The figures shown are indicative planning ranges prepared from the project scope in the PAD and ESMF and typical staffing of comparable cable-landing and terrestrial fiber works. The ESMF expects most work to require skilled labor and any labor influx to be minor or modest. Figures will be replaced with the PIU staffing plan and contractors' workforce plans in the C-LMPs, and Tables 1–4 will be updated before works start. Community workers are not anticipated and are not shown.

2.2. Workforce need by location

It is estimated that the project will need the following workforce, for the following types of jobs and with the following skills, by project location:

Table 2 – Timing of labor requirements by location, types of jobs and skills needed

Project location	Number and type of worker	Type of job	Skills required	Timing of labor needs
Location 1: Monrovia, Montserrado County (MoPT/PIU; Liberia Telecommunications Authority (LTA), Central Bank of Liberia (CBL), Liberia Revenue Authority (LRA), Ministry of Commerce and Industry (MoCI), LRREN; training providers)	Direct workers: 14	Project management, fiduciary, environmental and social (E&S), M&E and technical advisory functions	Professional qualifications in project management, procurement, finance, E&S, OHS, GBV, M&E and ICT	Phases 1–3
	Contracted workers: 65–110	Consulting firms (legal, transaction, regulatory); IT and system integrators; CSIRT/SOC operator; training providers and incubators; drivers, cleaners and guards	Professional ICT, cybersecurity, legal and training skills; semi-skilled drivers and guards	Phases 1–2; SOC in Phase 3
	Primary supply workers: not quantified	Supply of IT and network equipment	Manufacturing and logistics (largely outside Liberia)	Phase 2
Location 2: Buchanan, Grand Bassa County (cable landing at Big Fanti Town; beach manhole; terrestrial ducts; CLS in the LTC compound)	Direct workers: PIU E&S and technical staff on supervision missions	Supervision, monitoring and community liaison	E&S, OHS, GBV and engineering	Phases 1–3
	Contracted workers: 85–160 (largest workforce)	Excavation, trenching, concrete and masonry; beach manhole and duct installation; CLS building; electrical and equipment installation; fiber splicing and testing; supervision; security; drivers; cooks and cleaners	Skilled (engineers, electricians, fiber splicers, machine operators), semi-skilled and unskilled; unskilled and semi-skilled workers recruited locally where possible	Phase 2; limited O&M staff in Phase 3
	Primary supply workers: not quantified	Supply and haulage of sand, gravel, cement and ducts	Quarrying, haulage and handling	Phase 2
Location 3: Nearshore and offshore marine cable route (Liberian waters off Buchanan)	Direct workers: PIU oversight visits only	Not applicable	Not applicable	Not applicable
	Contracted workers: 50–80 (mainly international crew)	Marine route survey; cable-laying vessel crew; plough and remotely operated vehicle operators; divers; shore-end pull crew; marine supervisors	Highly specialized and certified marine, diving and cable-laying skills	Phase 1 (survey); Phase 2 (installation); repairs in Phase 3

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Project location	Number and type of worker	Type of job	Skills required	Timing of labor needs
	Primary supply workers: not quantified	Manufacture of submarine cable and repeaters	Manufacturing (outside Liberia)	Phase 2

Note: Indicative numbers (see note to Table 1). Community workers are not anticipated in any location.

2.3. Worker profiles

Project workforce is estimated to involve the following types of worker profiles:

Table 3 – Worker profiles

Type of worker	Male	Female	National or international migrants	Young workers above minimum age but below 18 years	Young workers between 18 and 25 years
Direct workers	To be reported from the approved PIU staffing plan	One female civil servant seconded for procurement support; others to be reported; women encouraged to apply	National staff; international individual consultants short-term only	0	Few, if any (support staff or interns)
Contracted workers	Majority, particularly in civil, marine and electrical work	Minority; contractors to set targets for women in the C-LMP (e.g., administrative, catering, flagging, training roles)	International marine and cable crews (about 50–80, short-term); skilled national workers from other counties	0 – project minimum age is 18	Likely among local unskilled and semi-skilled workers
Primary supply workers	Not quantified	Not quantified	International (cable and equipment manufacturers) and national (local aggregate suppliers)	0 in hazardous work; verified through supplier screening	Not quantified
Community workers	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

The PIU has confirmed that both national and international workers will be engaged. Migrant workers are expected to come mainly from (i) outside Liberia – specialist marine, cable-laying, splicing, testing and commissioning crews of the cable supply and installation contractor, whose countries of origin will be known once the contractor is selected; and (ii) other counties of Liberia – skilled technicians and supervisors, only where the required skills cannot be sourced in Grand Bassa County. They will meet labor needs during construction and installation (Phase 2). Unskilled and semi-skilled workers will be recruited locally in Buchanan and Big Fanti Town through transparent, publicized recruitment, with priority to the project communities. In line with the principle of non-discrimination and equal opportunity (ESS2, para. 13), qualified skilled workers from Grand Bassa

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County, including Buchanan and Big Fanti Town, will be given priority for skilled positions where they meet the job requirements. Contractors will advertise skilled vacancies locally first, recruit workers from other counties or from abroad only where the required skills are not available locally, and report the county of origin of all workers, by skill level and sex, in their monthly reports, against the local-recruitment targets in Table 9. Marine crews are expected to live on board the installation vessel; any worker accommodation on land will meet the requirements in Section 6.

2.4. Contracting structure

The PIU anticipates procurement packages covering connectivity infrastructure, goods and IT, ICT systems, consultancy services and project implementation support. The procurement plan has not yet been shared; the timing and workforce of each package will be confirmed from the procurement plan and the contractors' staffing and mobilization plans, and Tables 1–4 will be updated accordingly.

Project workforce is expected to be contracted through the following arrangement:

Table 4 – Contracting structure

Type of worker	Will be engaged directly by contractor / sub-contractor	Will be engaged through brokers, intermediaries or agents
Contracted workers	All contracted workers (about 200–350 at peak), engaged directly by the cable supply and installation contractor, works contractors, consulting firms and service providers	Not anticipated. Any use of brokers, intermediaries or agents requires prior PIU approval and due diligence, and no recruitment fees may be charged to workers (Section 10)
Workers engaged by sub-contractors	Expected for specialist works (e.g., civil works, diving, fiber splicing, security); numbers to be declared in the C-LMP	Not anticipated; as above
Primary supply workers	Engaged by primary suppliers (not quantified)	Not applicable

3. ASSESSMENT OF KEY POTENTIAL LABOR RISKS

The PAD rates the project's social risk and SEA/SH risk classification as Substantial. The following potential labor risks are anticipated by project phase and activity and will be mitigated through the measures shown (Table 5).

An overview of potential health and safety hazards and corresponding mitigation measures is provided in Annex 11, including telecommunications-specific hazards (marine and diving operations, optical fiber, radio-frequency fields, confined spaces and lone working). Detailed controls – following the hierarchy of elimination, substitution, engineering controls, administrative controls and, last, personal protective equipment (PPE) provided free of charge – and emergency preparedness and response arrangements will be set out in the site-specific ESIA/ESMP, the OHS Management Plan (ESCP 2.2) and contractors' OHS plans. Workers may remove themselves from work situations they reasonably believe present an imminent and serious danger to their life or health, without retaliation (ESS2, para. 27).

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Table 5 – Anticipated risks by project phase and project activity

Project phase / cycle	Activity	Key labor risk	Proposed strategy to mitigate risk
Phase 1 – Preparation	PIU establishment and staffing; recruitment of PIU staff and individual consultants (Component 5)	Insecure employment and disputes arising from unclear terms; fatigue and related errors from excessive working hours; sexual exploitation/ harassment; unfair or exclusionary recruitment; and unresolved workplace concerns or retaliation due to the absence of a staff grievance channel	• Written contracts in line with the Decent Work Act, 2015 (DWA) and ESS2; advertised, merit-based recruitment • Codes of Conduct and SEA/SH training • Worker grievance mechanism in place before any further engagement of workers (ESCP 2.3); PIU staff already engaged (including the civil servant assigned to the PIU) use the interim worker GM adapted from the SEP grievance mechanism and managed by the PIU Social and GBV Specialist (Section 9) • **Lead:** Project Coordinator; Social and GBV Specialist
	Studies, transaction advisory, ESIA/ESMP preparation and field travel (Monrovia–Buchanan)	Injury or death from road traffic accidents; fatigue and impaired judgment during field travel; insecure employment, underpayment or excessive working hours for consultants' personnel; and sexual exploitation, abuse or harassment during field activities	• Journey management and driver and vehicle rules • ESS2 and Code of Conduct clauses in consultants' terms of reference and contracts (ESCP 1.3) • **Lead:** Project Coordinator; consultants' team leaders
	Marine route and geotechnical surveys; site investigations at Big Fanti Town and the LTC compound	Vessel collisions, grounding or capsizing; drowning; strains and other musculoskeletal injuries from manual handling; heat-related illness; unequal or less favorable employment terms for international crews; and conflict, injury or livelihood disruption arising from interactions with fishing communities	• Marine safety plan, certified crew, life jackets and PPE • Terms of international crews checked against ESS2; working-time records • Community interaction rules and Codes of Conduct • **Lead:** survey contractor; PIU Environmental and Social Safeguards and GBV Specialists

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Project phase / cycle	Activity	Key labor risk	Proposed strategy to mitigate risk
Phase 2 – Implementation / construction	Construction of the CLS (LTC compound), beach manhole and terrestrial duct and trench work (Buchanan)	Trench collapse; falls; workers struck by machinery; electrocution or injury from buried or overhead utilities; musculoskeletal injuries from manual handling; heat-related illness; insecure employment due to casual work without written contracts; delayed or underpayment of wages; fatigue from excessive working hours; exclusion, conflict or exploitation arising from non-transparent local hiring and gatekeeping; child labor through informal recruitment; SEA/SH associated with labor influx; and transmission of communicable diseases	• C-LMP and OHS plan approved before works (ESCP 1.1.8, 2.2) • Trench support, edge protection, segregated traffic routes, permits to work and utility locating; PPE free of charge • Written contracts and employer register with age verification (minimum age 18); wage-payment monitoring • Transparent, publicized local recruitment; priority to the project communities; local-recruitment targets (Table 9) specified in bidding documents • Codes of Conduct, SEA/SH training & periodic sensitization exercises, health awareness; site grievance mechanism • Dissemination of information, education and communication (IEC) materials on the prevention of and response to GBV/SEA/SH • **Lead:** contractor HSE and HR officers; supervision consultant; PIU E&S specialists
	Marine and nearshore cable installation (cable-laying vessel, ploughing, diving, shore-end pull)	Drowning; diving-related injury or decompression illness; workers struck or crushed by suspended loads, cables or mooring lines; fatigue-related errors and accidents from long shifts; unequal or less favorable employment terms for international crews; coercion or restricted freedom of movement through retention of identity documents; and collision, injury or livelihood disruption arising from interactions with fisherfolk	• Approved marine and dive safety plan: dive supervisor, standby diver, weather limits, emergency evacuation • Certified personnel; working time and rest records • ESS2-compliant terms for international crews (no retention of documents; repatriation) • LMP and ESHS requirements annexed to the cable contract • **Lead:** cable contractor's marine superintendent and HSE officer; PIU Environmental and Social Safeguards and GBV Specialists

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Project phase / cycle	Activity	Key labor risk	Proposed strategy to mitigate risk
	ICT installation (CSIRT/SOC facilities, e-signature and public key infrastructure (PKI) platforms, LRREN, payment systems)	Electric shock or electrocution; burns, smoke inhalation or property damage from fire; falls from racks or towers; musculoskeletal strain and repetitive strain injuries from poor workstation setup or manual handling; and chemical exposure, burns or environmental contamination from damaged batteries and improper e-waste handling	• Lock-out/tag-out and permits to work; fall protection and rescue plan; fire safety • E-waste procedures (ESCP 1.1.9) • **Lead:** contractor HSE officer; PIU Environmental Specialist
	Digital skills training, internships and placements, DigiLeap, payments and merchant networks (Component 4)	Sexual exploitation, abuse or harassment of trainees, including technology-facilitated SEA/SH; exclusion of women and persons with disabilities from training opportunities; unequal access to reasonable accommodation and learning resources; underpayment, excessive working hours or insecure contracts for trainers; and injury, exploitation or denial of fair terms during internships and work placements	• Codes of Conduct, SEA/SH training and safeguarding procedures (including online conduct) for training providers and incubators • Non-discrimination and reasonable accommodation; written placement agreements (hours, stipend, OHS, grievance access) • **Lead:** training providers; PIU Social and GBV Specialist
	Security, driving and transport services	Fatigue, impaired alertness and related errors or accidents from long hours and night shifts; injury, intimidation or excessive use of force by security personnel; and injury or death from road traffic accidents	• Screening, training and Codes of Conduct for security personnel; Security Management Plan if required (ESCP 4.4) • Working-time rules; defensive driving; Traffic and Road Safety Management Plan (ESCP 4.1) • **Lead:** security and transport contractors; PIU Social and GBV Specialist

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	Primary supply of fiber-optic cable, network equipment, sand, gravel and cement	Exploitation and loss of schooling through child labor; coercion, restricted movement or withheld wages through forced labor; and serious injury, illness or death from unsafe working conditions at primary suppliers, particularly local sand and aggregate sources	• Risk-based screening, declarations and site visits; time-bound corrective action; change of supplier where remedy is not possible (ESS2, paras. 39–42) • **Contract clauses:** primary suppliers employ no one under 18 in hazardous work (including quarrying, sand mining, loading and haulage), verify and record workers' ages, and use no forced, bonded or trafficked labor; signed supplier declarations and Code of Conduct (Annex 2) • **Preventing child labor and school absenteeism:** no children at sand, gravel and quarry sites, including as helpers or loaders; unannounced site visits during school hours; awareness sessions for supplier workers and nearby communities on the Children's Law, 2011 and compulsory schooling; any child found removed, paid all wages owed and referred to the Ministry of Gender, Children and Social Protection (MGCSP) and the Ministry of Labor (MoL), with support to return to school (Section 7) • **Preventing forced labor and exploitation:** written terms, wages paid in full, on time and directly to workers, no recruitment fees or debt bondage, no retention of identity documents or wages, freedom to resign; confidential interviews with supplier workers during site visits • **Safe working conditions:** sourcing only from licensed suppliers; safe excavation slopes, PPE, safe loading and haulage, drinking water and first aid at aggregate sources • **Remedy:** access for supplier workers to the project grievance mechanism; time-bound corrective action plans verified by the PIU; replacement of the supplier within a reasonable period where remedy is not possible • **Lead:** contractors' procurement staff; PIU Social and GBV Specialist

Project phase / cycle	Activity	Key labor risk	Proposed strategy to mitigate risk
	Activation of the CERC (if triggered)	Employment disputes, unequal treatment or engagement of unqualified workers arising from rushed recruitment; injury, illness or death due to weakened OHS controls; and coercion, injury or uncompensated work where community or volunteer labor is used without clear terms and safeguards	• LMP applied through the CERC Manual (ESCP 1.4); LMP updated before any community labor • **Lead:** Project Coordinator
Phase 3 – Operation	Operation and maintenance of the CLS, beach manhole and terrestrial network, including cable repairs	Injury or delayed emergency response during lone working; falls from height; electric shock, burns or electrocution; asphyxiation, toxic exposure or entrapment in confined spaces such as manholes and vaults; eye injury from optical fiber fragments or laser exposure; fatigue-related errors during night call-outs; and injury or death from road traffic accidents	• O&M OHS procedures; lone-working check-in; confined-space entry permits; working-time rules; incident reporting (ESCP E) • **Lead:** O&M operator HSE officer; PIU Environmental Specialist
	SOC/CSIRT operations; replacement and decommissioning of equipment	Fatigue, impaired concentration and stress-related illness from night and shift work; musculoskeletal disorders, eye strain and repetitive strain injuries from poor workstation setup; and cuts, burns, chemical exposure or environmental contamination from improper e-waste handling	• Shift rosters respecting rest periods under the DWA; ergonomic workstations; E-Waste Management Plan if required (ESCP 1.1.9) • **Lead:** SOC operator; PIU Environmental Specialist

4. BRIEF OVERVIEW OF LABOR LEGISLATION: TERMS AND CONDITIONS

All work undertaken under WARDIP SOP II–Liberia shall comply with the World Bank ESF and ESS2 on Labor and Working Conditions, international standards to which Liberia adheres, and Liberian legislation and regulations on labor and working conditions, in particular:

- The Constitution of the Republic of Liberia, 1986
- International Labour Organization (ILO) Conventions ratified by Liberia, including C029 (Forced Labor), C087 (Freedom of Association), C098 (Right to Organise and Collective Bargaining), C100 (Equal Remuneration), C138 (Minimum Age) and C182 (Worst Forms of Child Labor)
- Decent Work Act, 2015 – the principal labor law (employment contracts, hours of work, wages, leave, OHS, child and forced labor, non-discrimination and dispute resolution)
- Civil Service Standing Orders (for civil servants working on the project)
- Children's Law, 2011 and the Hazardous and Light Work Lists, 2022 (approved, pending gazetting)
- Revised Act to Ban Trafficking in Persons within the Republic of Liberia, 2021
- Domestic Violence Act, 2019
- Public Health Law, 2010 and the National Water, Sanitation and Hygiene Commission Act, 2012 (workplace sanitation and hygiene)
- Education Reform Act, 2011 (compulsory schooling)
- Convention on the Rights of Persons with Disabilities (ratified 2012) and the National Implementation Strategy, 2013; Liberia National Youth Policy, 2019
- Environment Protection Agency Act, 2002, Environmental Protection and Management Law, 2002 and the ESIA procedural guidelines
- Public Procurement and Concessions Act, 2010 (inclusion of labor and ESHS requirements in contracts)
- World Bank Group General EHS Guidelines and EHS Guidelines for Telecommunications (good international industry practice for OHS)

The key terms and conditions that apply to project workers are summarized in Section 8. Annex 1 describes the key requirements of ESS2, national legislation and institutions, and compares them provision by provision, setting out the measure the project will apply to close each gap.

5. RESPONSIBLE STAFF

For implementation and reporting on this LMP, the MoPT, through the WARDIP SOP II–Liberia PIU, will engage the following staff with the following responsibilities. At present, the Project Coordinator, Finance Assistant and Procurement Specialist are in post, and a female civil servant has been assigned by the MoPT to the PIU for procurement support. The recruitment of the Environmental Specialist and the Social Safeguards and GBV Specialist required under ESCP A.1 has been finalized, and both joined the PIU On November 2, 2026. Both specialists assumed full responsibility for the roles set out in Table 6 immediately (ESCP A.1); in line with the ESCP, the Social Safeguards and GBV Specialist covers both the social safeguards and the GBV roles. The Project Coordinator remains accountable for the LMP. The Communication Specialist, M&E Specialist, National Procurement Specialist, Administrative Assistant, Office Assistant and three drivers will be recruited from December 2026 under written contracts in line with the PIU staffing plan, with all positions filled by March 2027. In this LMP, the Social Safeguards and GBV Specialist is referred to as the Social and GBV Specialist. When the SPV is established, it must recruit its own Environmental Specialist and Social and GBV Specialist before IDA funds are disbursed to it (ESCP A.2).

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Table 6 – Responsible staff

Job title	Professional responsibilities
PIU Project Coordinator	• Overall accountability for adoption, disclosure, resourcing and implementation of the LMP • Engagement and management of direct workers (PIU staff and consultants) under written contracts • Escalation points for severe worker grievances and serious incidents; approves corrective action plans • Coordination with contractors and the World Bank; sign-off of quarterly E&S reports to the World Bank (ESCP C)
Social and GBV Specialist (Social Safeguards and GBV Specialist, PIU) – LMP focal person	• Day-to-day implementation and monitoring of the LMP: terms and conditions, Social Inclusion and non-discrimination, child and forced labor, age verification • Review of contractors' C-LMPs, worker registers, contracts and wage records; announced and unannounced audits • Manages the higher tier of the worker GM and the central grievance record; SEA/SH referrals to GBV service providers • Codes of Conduct, SEA/SH and labor-rights training of workers and contractors and periodic sensitization; SEA/SH Action Plan alignment
Environmental Specialist (PIU) – OHS lead	• Review and approval of contractors' OHS plans and Contractor's Environmental and Social Management Plans (C-ESMPs); OHS inspections and audits • Incident and accident notification (48 hours; 24 hours for fatalities and SEA/SH) and root-cause analysis with Corrective Action Plan within 10 days (ESCP E); incident reporting procedure and form in Annex 14 • Emergency preparedness and response; OHS induction and training; e-waste
Procurement Specialist and National Procurement Specialist (PIU)	• Inclusion of the LMP, ESHS specifications, Codes of Conduct, SEA/SH disqualification and the local-recruitment targets (Table 9) in bidding documents and contracts (ESCP 1.2) • Contractor due diligence on labor and OHS capacity; application of contractual remedies and sanctions
M&E Specialist (PIU)	• Integrates the LMP indicators (Table 9) – workforce by sex, age and origin, incidents, grievances and training – into the project management information system (MIS) • Compiles labor data for quarterly E&S reports
Communication Specialist (PIU)	• Disclosure of the LMP and publicity of the worker grievance mechanism and its entry points to PIU staff, contractors and workers • Supports stakeholder engagement under the SEP, including dissemination of Codes of Conduct and SEA/SH awareness messages

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Financial Management Assistant / Project Accountant (PIU, with PFMU-MFDP)	• Payroll and wage-payment verification for direct workers; verification of contractor wage payments where required • Ensures the budget for LMP implementation in annual work plans
Supervision Engineer / Supervising Consultant (E&S and OHS staff)	• Daily supervision of contractors' labor and OHS compliance; checks of worker registers, contracts and payroll • Monitors the contractors' site worker GM and reports in monthly progress reports (ESMF 10.7)
Contractors' HSE Officer, HR Officer and Social / Community Liaison Officer	• Implement the C-LMP and OHS plan: written contracts, worker register, age verification, induction and toolbox talks, PPE • Operate the site worker GM (lower tier); report incidents to the PIU immediately; manage subcontractors and primary suppliers

A PIU staffing plan and organogram have not yet been approved; Annex 13 shows the indicative arrangement. The PIU will approve the staffing plan and organogram, in consultation with the World Bank, in January 2027, and the organogram will be fully operational, with all planned positions filled, by March 2027; Annex 13 will be updated accordingly. Training of PIU staff, contractors and workers on the LMP, OHS, SEA/SH and the grievance mechanism will be delivered under the Training and Capacity Building Plan (ESCP B), which the PIU has prepared and which covers LMP, OHS and SEA/SH training; the PIU E&S team will complete the training of PIU staff and GRC members by January 2027. The costs of LMP implementation – PIU staff time, training, monitoring and the worker grievance mechanism – are covered under Component 5; contractors' costs of complying with the LMP are included in their contract prices.

6. POLICIES AND PROCEDURES

The project, any contractor and third parties (subcontractors, brokers, agents and intermediaries), by accepting a contract to work on the project, shall commit to the following policies and procedures and shall sign the Code of Conduct for Contracted Companies (Annex 2) when agreeing to supply work and workers to the project. Individual workers sign the Code of Conduct for Employees (Annex 3). The Contractor's and Individual Codes of Conduct annexed to the ESMF (Annexes 15 and 16) have been modified for the purpose of this LMP, in line with ESS2 and the project-specific requirements, and are provided in Annexes 2 and 3. They will be signed by everyone engaged by the project: all PIU staff, consultants and seconded staff sign the Code of Conduct for Employees (Annex 3); every contractor, subcontractor, consulting firm, primary supplier and service provider signs the Code of Conduct for Contracted Companies (Annex 2); and each of their workers signs Annex 3. Signing is mandatory and a condition of engagement on the project. In line with ESS2, paragraph 8, civil servants seconded or assigned to the PIU (including the MoPT civil servant supporting procurement) remain subject to the terms and conditions of their public-sector employment under the Civil Service Standing Orders, unless there has been an effective legal transfer of their employment to the project; of ESS2, only the requirements on protecting the work force (child and forced labor, paras. 17–20) and on occupational health and safety (paras. 24–30) apply to them. Their signature of the Code of Conduct (Annex 3), participation in SEA/SH training and access to the worker grievance mechanism are project requirements that apply as a condition of their assignment to the project, without changing their terms of employment. The workplace policies and procedures that apply to all project workers are (details in Annex 6):

- Non-discrimination and equal opportunity
- Occupational health and safety (OHS), including emergency preparedness and response
- Freedom of association

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- Prevention of sexual exploitation and abuse and sexual harassment (SEA/SH), in line with the SEA/SH Action Plan (ESCP 1.1.7 and 4.3)
- Prevention of child labor
- Prevention of forced labor and trafficking
- Transparent and fair hiring of workers
- Transparent worker documentation

In addition, contractors will apply the following project-specific procedures: (i) a worker conduct and labor-influx procedure covering behavior in the community, interaction with fishing communities and health awareness, including human immunodeficiency virus/acquired immune deficiency syndrome (HIV/AIDS) and other communicable diseases; (ii) where workers are accommodated on land, accommodation that provides adequate space, safe water, sanitation, ventilation, security and separate facilities for women, free of charge or at reasonable cost; (iii) security personnel screened, trained and bound by a Code of Conduct (ESCP 4.4); and (iv) traffic and road safety rules (ESCP 4.1).

7. AGE OF EMPLOYMENT

In accordance with ESS2, international conventions (ILO Conventions 138 and 182, the Convention on the Rights of the Child and the African Charter on the Rights and Welfare of the Child) and national legislation (Decent Work Act, 2015 and Children's Law, 2011), a child over the minimum age and under 18 years may be engaged in connection with a project only in work that is not hazardous and under special conditions. The general conditions under national law for engaging children on World Bank-financed projects in Liberia are summarized in Table 7 for reference only. They are not applied on this project: the PIU has adopted 18 years as the minimum age for all project work (see below).

Table 7 – Conditions for engaging children in a World Bank financed project in Liberia (national law; for reference – not applied on this project)

Type of work engagement	Conditions that allow a child to be engaged for work
Light work from age 14 (as per ESS2)	Only with parental authorization and in accordance with the Decent Work Act, 2015: • a maximum of two hours a day and fourteen hours a week; • light work is work not likely to harm the child's health, safety, moral or material welfare or development, or school attendance; • activities as defined in the Hazardous and Light Work Lists, 2022.
Apprenticeship from age 15	Only with parental authorization and in accordance with the Children's Law, 2011: • the apprenticeship or employment contract is made with the consent of the parent or guardian, and its record is sent to the Ministry of Labor (MoL); • the employer trains and instructs the child in a trade, provides reasonable pay or allowances, takes responsibility for any harm caused by the work, provides a safe and healthy environment and complies with all employment laws.

Type of work engagement	Conditions that allow a child to be engaged for work
Employment from age 15	Only with parental authorization, with the employer duties above (Children's Law, 2011), and in accordance with the Decent Work Act, 2015: • a register of employed children showing names, ages and certified dates of birth (Article 21.5); • a notice at the workplace setting out the special conditions for children, including the Hazardous and Light Work Lists, 2022; • a child aged 15 (not yet 16) works no more than 7 hours a day and 42 hours a week, and not during school hours; • daily rest periods totaling at least one hour, with no more than four consecutive hours of work; • annual leave plus additional leave equal to one working week.

Project-specific minimum age. Construction, installation, marine and diving, electrical, security and O&M work on the project are hazardous work under ESS2 and the Hazardous and Light Work Lists, 2022. In addition, the PIU has decided that the minimum age for all work on WARDIP SOP II–Liberia is 18 years, whether the work is hazardous or not, for direct, contracted and any community workers; no person under 18 will be engaged, including in office support or other light work. Primary suppliers will employ no one under 18 in hazardous work, which includes quarrying, sand mining, loading and haulage (Section 12). The conditions in Table 7 therefore do not apply on the project, and Annexes 4 and 5 are not applicable. Participants in digital skills training and the DigiLeap program (ages 18–45) are project beneficiaries rather than project workers; internships and placements will be assessed individually and, where they constitute work, this LMP applies.

Age verification and remediation. Employers will verify the age of every worker before engagement using a birth certificate, national identity card, passport or voter card. Where no document exists, age will be established from at least two sources (for example, school records, a medical assessment or credible testimony) and recorded in the employer register. If a person below the minimum age is found working, they will be removed immediately and responsibly from the work, paid all wages owed, and the case will be recorded, reported to the PIU and, with the child's best interests as the priority, referred to the Ministry of Gender, Children and Social Protection (MGCSP) and the MoL for child-sensitive remediation, including support to return to school. The employer will be subject to contractual sanctions.

8. TERMS AND CONDITIONS

The following terms and conditions apply to workers on WARDIP SOP II–Liberia:

Table 8 – Terms and conditions

Condition	Applicable standard
Contract	• Every direct and contracted worker, including casual and short-term workers, receives a written contract before starting work, in a language they understand, explained orally where needed. • Contracts comply with the Decent Work Act, 2015 and state the job, place of work, duration, hours, wages, deductions, benefits, leave, notice and access to the worker grievance mechanism.

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Condition	Applicable standard
Hours of work	• Normal hours of work do not exceed 8 hours a day and 48 hours a week under the Decent Work Act, 2015, with at least one rest day (36 consecutive hours) a week and adequate daily rest. • Overtime is voluntary, limited as provided by law and paid at not less than 150 percent of the normal rate, or compensated by agreed time off. • Shift work, offshore rotations and SOC night work follow rosters that respect legal rest periods and fatigue management.
Compensation	• Wages are not less than the applicable statutory minimum wage or collective agreement, are paid regularly (at least monthly, and more often for daily and casual workers) and directly to the worker, preferably by bank or mobile money. • Equal pay for work of equal value; deductions only as allowed by law or with the worker's written consent; itemized pay slips. • Statutory social security contributions are paid where applicable.
Leave	• Workers enjoy annual leave, public holidays, sick leave and maternity leave, and the accompanying benefits, consistent with the Decent Work Act, 2015.
Vulnerable workers	• No person under 18 is engaged on the project (Section 7). • Pregnant workers and mothers of a child less than eight months old shall not be assigned to night work or overtime without their consent. Pregnant women shall not be assigned to a post outside their place of residence after the fourth month of pregnancy if, in the opinion of a medical practitioner or midwife, the assignment is detrimental to their health. • Reasonable accommodation for workers with disabilities.
Migrant and international workers	• Terms no less favorable than those of comparable national workers for equal work; contracts in a language they understand. • No retention of passports or identity documents; no recruitment fees; return travel provided at the end of the contract; terms verified by the PIU against ESS2.
Notice and termination	• Workers are informed of the notice period for resignation and termination in line with national law and good international practice. • On termination, all wages, benefits and severance due are paid on or before the end of employment, with a certificate of employment; any collective dismissal follows the Decent Work Act, 2015 and ESS2.

These terms and conditions apply to all direct and contracted workers. Contractors and subcontractors must apply them to all their workers, issue and explain the Code of Conduct for Employees (Annex 3) in a language workers understand, and keep signed contracts and Codes of Conduct in the employer register.

9. GRIEVANCE MECHANISM

Workers on the project will have access to a worker grievance mechanism (worker GM) to raise any workplace concern. Three channels are available: (i) the worker GM, for the workplace concerns of direct and contracted workers; (ii) the project grievance mechanism under the Stakeholder Engagement Plan (SEP), for broader concerns about the project (ESCP 10.2); and (iii) the World Bank Grievance Redress Service (GRS), accessible online (https://wbgcmsgrs.powerappsportals.com/en-US/new-complaint/) and by e-mail (grievances@worldbank.org). Workers may also use statutory channels – the MoL, the National Labor Commission and the courts – at any time.

Basis in the SEP. Section 5.7 of the SEP provides that, in accordance with this LMP, WARDIP SOP II–Liberia requires contractors to establish a Workers' Grievance Redress Mechanism at site level. The mechanism gives workers a formal and structured process to raise concerns, with representation from the

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contractor, a representative of the PIU and the workers themselves. Section 5.9 of the SEP sets out the procedure for handling SEA/SH, GBV and VAC complaints. This section and Annex 12 put these provisions into operation for project workers.

Interim arrangement until contractors are mobilized. No contractor has yet been engaged. Until contractors establish their site-level mechanisms, the worker GM operates by adapting the existing project grievance mechanism in the SEP for use by workers, managed by the PIU. At present, the only project workers engaged are PIU staff, including the civil servant assigned to the PIU; no individual consultants, consulting firms or service providers have yet been contracted. Grievances from PIU staff – and, once engaged, from individual consultants and the workers of consultants and service providers – are received through the SEP entry points and the worker entry points in Annex 12. They are handled by the PIU Social and GBV Specialist separately from community grievances, recorded in the Worker Grievance Register (Annex 16) and resolved within the timelines in Annex 12, using the forms in Annexes 7–10.

Capacity of the interim arrangement. The project grievance mechanism in the SEP was designed mainly for community grievances. To make it capable of handling workers' grievances, the PIU will: (i) designate the Social and GBV Specialist as the worker-grievance focal person, with the Project Coordinator as alternate where a complaint concerns the Specialist; (ii) train the PIU staff and Grievance Redress Committee (GRC) members involved in grievance handling on workers' grievances – labor rights under the Decent Work Act, 2015 and ESS2, confidentiality, protection from retaliation, OHS complaints and survivor-centered SEA/SH referral – through training delivered by the PIU E&S team (Environmental Specialist and Social Safeguards and GBV Specialist) by December 2026 and, in any case, before contractors are mobilized, with refresher training at least annually and for the members of each site grievance committee at its establishment; (iii) keep worker grievances in a separate, access-restricted register (Annex 16); and (iv) report on the functioning of the interim arrangement in the quarterly E&S reports. GRC members have not yet been trained on workers' grievances; this training is therefore included as a priority action in Table 10.

Site-level mechanism once contractors are mobilized. As a condition of mobilization and as part of its C-LMP (ESCP 1.1.8), each contractor will establish a site-level Workers' Grievance Redress Mechanism with a site grievance committee made up of: (i) a contractor representative, supported by a grievance focal person in the contractor's HR department; (ii) a representative of the supervising entity/team (the supervision consultant's E&S staff); and (iii) a workers' representative chosen by the workers, with women workers represented wherever women are employed. The contractor keeps a site register in the Annex 16 format, informs all workers of the mechanism at induction, and submits the register to the PIU monthly. Cases not resolved at site level are escalated to the PIU.

Principles, tiers and timelines. The worker GM is established before workers are engaged and maintained throughout implementation (ESCP 2.3). It operates on the principles of accessibility; confidentiality and cultural sensitivity; fairness, impartiality and protection from retaliation; accountability; adaptation to the severity of the case; the right to appeal and escalate; and continuous improvement. It has two tiers: a lower tier at each workplace (the site grievance committee or, for direct workers and during the interim arrangement, the PIU Social and GBV Specialist) and a higher tier at the PIU, with escalation to the Project Coordinator. Cases are classified by severity, **resolved** within 7–20 business days according to severity (Annex 12) and recorded in the PIU central grievance record and the Worker Grievance Register (Annex 16).

SEA/SH, GBV and VAC complaints (SEP Section 5.9). These complaints are handled under the SEA/SH, GBV and VAC grievance procedure in Section 5.9 of the SEP and the SEA/SH Action Plan (ESCP 1.1.7),

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as applied to workers in Annex 12. They may be made through any entry point, are referred within 24 hours to the PIU Social and GBV Specialist, are recorded only in a restricted register, and are never mediated. Survivors are offered referral, with their informed consent, to GBV service providers, the Women and Children Protection Section of the Liberia National Police or the MGCSP; cases involving children are reported to the MGCSP and/or the police. Incidents are notified to the World Bank in line with ESCP action E, using the procedure in Annex 14 and the SEA/SH format in Annex 15.

10. CONTRACTOR MANAGEMENT

The MoPT, which awards all project contracts, is responsible through the WARDIP SOP II–Liberia PIU for ensuring that contractors and third parties who mobilize and engage workers on the project:

- are legally constituted and reliable entities, selected after due diligence on their labor and OHS capacity and record;
- are aware of, and contractually obliged to uphold, the policies in Section 6, through E&S specifications in procurement documents and contracts (ESCP 1.2);
- sign the project Code of Conduct (Annex 2) and require their workers to sign the Code of Conduct for Employees (Annex 3);
- prepare a Contractor's Labor Management Plan (C-LMP) and OHS plan, as part of the Contractor's Environmental and Social Management Plan (C-ESMP), and obtain PIU approval before mobilization (ESCP 1.1.8);
- keep an employer register with the location of work, workers' names, dates of birth, job titles, job descriptions and reporting lines, and make it available on request;
- manage and monitor their sub-contractors and primary suppliers in accordance with ESS2 and Liberian law, including flowing down these requirements;
- register with the MoL and comply with MoL and Environmental Protection Agency (EPA) inspections;
- recruit local workers through transparent and publicized procedures agreed with local authorities in Buchanan, without recruitment fees or gatekeeping, give priority to the project communities and meet the local-recruitment targets in Table 9 (at least 60% of unskilled and semi-skilled and at least 40% of skilled workers), or the higher percentage specified in the contract;
- **establish and operate a site-level Workers' Grievance Redress Mechanism, with a site grievance committee including representatives of the contractor, the supervising entity / team and the workers, in line with Section 5.7 of the SEP, Section 9 and Annex 12, and keep a site grievance register (Annex 16);**
- submit monthly E&S reports, including workforce data by sex, age and origin, contracts, wage payments, training, incidents and worker grievances (ESCP D); and
- notify the PIU immediately of any serious incident or accident so that the World Bank is notified within 48 hours (24 hours for fatalities and SEA/SH), and support the root-cause analysis and Corrective Action Plan due within 10 days (ESCP E), following the incident reporting procedure and form in Annex 14 (SEA/SH: Annex 15).

The PIU, supported by the supervision consultant, will monitor contractors' performance through review of monthly reports and documents (employer register, contracts, payroll, grievance logs), announced and unannounced site inspections and audits, and confidential interviews with a sample of workers. Non-compliance will trigger time-bound corrective action and, where warranted, withholding of payment for ESHS non-performance and suspension of the relevant works under the contract. To support this, the PIU will develop a contract management and responsibility matrix that sets out, for each contract, the LMP, OHS and ESHS obligations of the contractor, the responsible person, deadlines, reporting requirements

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and means of verification. The matrix will be prepared within one month of each contract signature, updated monthly, and used to track contractors' compliance with their contractual obligations and the status of corrective actions; a summary will be included in the quarterly E&S reports to the World Bank.

10.1. Monitoring and reporting

LMP implementation will be tracked through the indicators in Table 9 and reported in the PIU's quarterly E&S reports to the World Bank (ESCP C), with contractors' monthly reports annexed (ESCP D). SEA/SH information will be reported only in aggregate, non-identifiable form. The LMP will be reviewed annually and whenever the update triggers in Section 1 occur.

Table 9 – LMP monitoring indicators

Indicator	Target	Frequency	Responsible	Means of verification
Workers with a signed written contract and verified age and identity before starting work (% of workers engaged)	100%	Monthly	Contractor HR officer; verified by PIU Social and GBV Specialist	Employer register reconciled with the complete workforce list, signed contracts and age/identity records; documented monthly spot checks and confidential worker interviews
New workers inducted on OHS, the Code of Conduct (including SEA/SH) and the worker grievance mechanism before starting work (%)	100%	Monthly	Contractor HSE officer	Dated induction registers, signed Codes of Conduct, induction materials, photographs where appropriate, and post-induction knowledge checks or confidential worker interviews
Workers paid in full and on time (% of workers on payroll, sampled)	100%	Monthly	Contractor; supervision consultant; PIU	Payroll reconciled with timesheets, contracts, itemized payslips and bank or mobile-money payment evidence; confidential worker interviews
Fatalities, lost-time injuries and serious incidents (number; lost-time injury rate per 200,000 hours worked)	Zero fatalities; all serious incidents notified within ESCP timeframes	Monthly; serious incidents immediately	Contractor HSE officer; PIU Environmental Specialist	Incident register and notifications; investigation and root-cause analysis reports; hours-worked records; medical records where available; corrective-action plans and verified closure evidence
Worker grievances received (by category and sex) and resolved within the Annex 12 timeframes (%)	At least 90% (to be confirmed at adoption)	Monthly	Grievance focal persons; PIU Social and GBV Specialist	Grievance log; dated acknowledgement and response records; case closure and appeal records; complainant confirmation of closure where appropriate; anonymized monthly grievance summaries

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Indicator	Target	Frequency	Responsible	Means of verification
Local workers employed on works contracts (number and % of workforce, by sex)	Priority to the project communities: at least 60% of unskilled and semi-skilled workers and at least 40% of skilled workers recruited from the project communities in Grand Bassa County (or the higher percentage specified in the contract)	Quarterly	Contractor; PIU Procurement Specialist	Employer register reconciled with contracts, recruitment records and payroll; lawful proof of residence or place of recruitment where appropriate; sex-disaggregated workforce reports
Primary suppliers screened before contract award (%)	100%	Quarterly	Contractor procurement staff; PIU Social and GBV Specialist	Completed due-diligence checklists, screening questionnaires and declarations; supporting document reviews; site-visit reports and worker interviews where feasible; corrective-action plans and procurement approval records
Corrective actions closed by the due date (%)	100%	Monthly	PIU E&S specialists; contractors	Corrective-action tracker supported by closure evidence, follow-up inspection reports, photographs or completed-action records, and formal PIU or supervision-consultant sign-off

Indicator	Target	Frequency	Responsible	Means of verification
PIU staff, contractor staff and workers trained on the LMP, OHS and SEA/SH (number, by sex)	100% of PIU staff, contractor staff and workers trained before starting work, with refresher training at least annually, in line with the Training and Capacity Building Plan (ESCP B); existing PIU staff and GRC members trained by January 2027	Quarterly	PIU E&S specialists	Training agendas and materials; facilitator reports; sex-disaggregated attendance records; pre- and post-training assessments; periodic worker interviews or observations of practice

10.2. Priority actions for the PIU

The PIU shall: (i) ensure that all PIU staff and consultants sign the Code of Conduct for Employees (Annex 3) and that every contractor, subcontractor, consulting firm, primary supplier and service provider signs the Code of Conduct for Contracted Companies (Annex 2), both modified from the ESMF in line with the project-specific requirements; (ii) operate the interim worker grievance mechanism adapted from the SEP grievance mechanism (Section 9) until contractors establish site-level Workers' Grievance Redress Mechanisms under Section 5.7 of the SEP, and handle SEA/SH, GBV and VAC complaints under Section 5.9 of the SEP; (iii) apply the incident reporting procedure adapted from the ESMF (Annexes 14 and 15); (iv) apply the human resources provisions of the Project Implementation Manual (PIM), which the PIU will use in place of a separate HR manual, consistently with this LMP, and map GBV service providers by December 2026 to establish the GBV referral list; (v) finalize and operationalize the project grievance mechanism and the SEA/SH Action Plan; (vi) share the procurement plan, the PIU staffing plan and organogram (January 2027) and the PIM with the World Bank, and update this LMP accordingly; (vii) apply this LMP, together with the PIM, – including the Codes of Conduct (Annexes 2 and 3), the workplace policies (Annex 6) and the worker grievance mechanism (Annex 12) – to all PIU staff and consultants, and to seconded civil servants to the extent provided in ESS2, paragraph 8 (OHS, child and forced labor), together with the project requirements on the Code of Conduct, SEA/SH training and grievance access (Section 6); and (viii) ensure that ESHS requirements, including on SEA/SH, which the PIU has confirmed are included in the bidding documents, are retained in all signed contracts. The specific actions, timing and responsibilities that the PIU shall implement are set out in Table 10:

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Table 10 – Priority actions for LMP implementation

Action	Timing	Responsible
Environmental Specialist and Social Safeguards and GBV Specialist (joined October 2026) assume full responsibility for their LMP roles in Table 6, the latter covering both the social safeguards and the GBV roles (ESCP); confirm that their terms of reference cover these responsibilities	In effect from 2 November 2026; terms of reference confirmed at LMP adoption (ESCP A.1)	Project Coordinator
Recruit the planned PIU staff – Communication Specialist, M&E Specialist, National Procurement Specialist, Administrative Assistant, Office Assistant and three drivers – through advertised, merit-based recruitment and written contracts consistent with this LMP	Recruitment from December 2026; all positions filled by March 2027	Project Coordinator
Issue written contracts to all PIU staff, consultants and seconded staff; apply the human resources provisions of the PIM (used in place of a separate HR manual) consistently with this LMP	At LMP adoption	Project Coordinator
Have the Codes of Conduct modified from the ESMF signed by everyone engaged by the project: all PIU staff, consultants and seconded staff sign Annex 3; every contractor, subcontractor, consulting firm, primary supplier and service provider signs Annex 2; and each of their workers signs Annex 3 after it has been explained in a language they understand. Keep signed copies in personnel files and employer registers	PIU staff: at LMP adoption and for new staff at engagement; contractors: before mobilization; workers: before starting work	Project Coordinator; contractors; verified by Social and GBV Specialist
Operate the interim worker GM adapted from the SEP grievance mechanism (Section 9), open the Worker Grievance Register (Annex 16), and publicize the worker grievance mechanism, including telephone and SMS entry points (Annex 12)	Before further project workers are engaged (ESCP 2.3)	Social and GBV Specialist
Train the PIU staff and Grievance Redress Committee (GRC) members involved in grievance handling on workers' grievances (labor rights under the DWA and ESS2, confidentiality, protection from retaliation, OHS complaints, survivor-centered SEA/SH referral); GRC members have not yet been trained	Grievance training by December 2026 and before contractors are mobilized; LMP, OHS and SEA/SH training of PIU staff and GRC members completed by January 2027; refresher at least annually	PIU E&S team (Environmental Specialist; Social and GBV Specialist); Project Coordinator
Apply the incident reporting procedure and forms in Annexes 14 and 15 (adapted from the ESMF), which are consistent with ESCP action E and the World Bank Environmental and Social Incident Response Toolkit (ESIRT)	At LMP adoption	Environmental Specialist
Map GBV service providers for the referral pathway and prepare the SEA/SH Action Plan	GBV service mapping: December 2026; SEA/SH Action Plan: within 3 months after the Effective Date (ESCP 1.1.7)	Social and GBV Specialist

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Action	Timing	Responsible
Make the project grievance mechanism operational	Within 3 months after the Effective Date (ESCP 10.2)	PIU
Annex the LMP, Codes of Conduct (Annexes 2 and 3) and ESHS requirements to all bidding documents and contracts; state the local-recruitment targets (Table 9), with priority to the project communities	Before contract signature (ESCP 1.2)	Procurement Specialist
Approve the PIU staffing plan and organogram; update Tables 1–4 from contractors' workforce plans	Staffing plan and organogram: January 2027 (fully operational by March 2027); Tables 1–4: before works start	Project Coordinator
Review and approve contractors' C-LMPs and OHS plans	Before mobilization (ESCP 1.1.8)	Environmental Specialist and Social and GBV Specialist
Develop a contract management and responsibility matrix for each contract (LMP, OHS and ESHS obligations, responsible person, deadline, means of verification) and use it to track contractors' compliance and corrective actions	Within one month of each contract signature; updated monthly	Social and GBV Specialist; Environmental Specialist; Procurement Specialist
Require each contractor, in its C-LMP, to establish a site-level Workers' Grievance Redress Mechanism with a site grievance committee (contractor, supervising entity/team and workers' representatives), keep a site register (Annex 16) and submit it to the PIU monthly	Before mobilization (ESCP 1.1.8)	Social and GBV Specialist; Procurement Specialist
Replace the Codes of Conduct in Annexes 15 and 16 of the ESMF with Annexes 2 and 3 of this LMP when the ESMF is next updated, so that the project uses one set of Codes	Next ESMF update	Environmental Specialist and Social and GBV Specialist

11. COMMUNITY WORKERS

Community workers are not anticipated under the current project design; the PIU has confirmed that no community labor or volunteer work is planned under any component at this stage. Should community labor be required (for example, under the CERC), this LMP will be updated before such work starts and the following will apply. Community workers do not need to be engaged through a written employment contract, but each community worker shall:

- offer their services voluntarily, without coercion;
- be appropriately trained for the work, in accordance with the General and industry-specific EHS Guidelines;
- be provided with relevant tools, safety equipment and safety briefings, free of charge;
- be given only non-hazardous tasks and not be under 18 years of age; and
- be informed in advance of the terms and conditions of the work, including the amount and method of payment (if any) and times of work.

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The PIU will assess the risk of child and forced labor in any community labor, conduct regular monitoring to verify that these requirements are met, and ensure that community workers have access to the project grievance mechanism through the PIU Social and GBV Specialist and the channels described in the ESMF.

12. PRIMARY SUPPLY WORKERS

Primary supply workers, employed by suppliers to the project, respond and report to the supplier with whom they have a contract. Primary suppliers are expected to include suppliers of submarine and terrestrial fiber-optic cable and network equipment and local suppliers of sand, gravel and cement. The project will require contractors to use suppliers with a good reputation that uphold the Decent Work Act, 2015 and the requirements of ESS2, including written contracts for workers, and to sign the Code of Conduct (Annex 2).

Screening and monitoring of primary suppliers (ESS2, paras. 39–42). Contractors, overseen by the PIU, will: (i) identify primary suppliers from the procurement plan and their own submissions; (ii) screen them, before contract award, through questionnaires and declarations, document checks and, where risk is significant (for example, local sand and aggregate sourcing), site visits; (iii) monitor them in proportion to risk and report to the PIU; (iv) require time-bound corrective action where child labor, forced labor or serious safety issues are found; and (v) shift to alternative suppliers within a reasonable period where remedy is not possible. The PIU Social and GBV Specialist will review screening records and carry out spot checks. Primary supply workers have access to their employer's grievance mechanism and to the project grievance mechanism.

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Annex 1: Key Legislation, ESS2 Key Requirements and Liberia's ESRM System Strengths and Gaps

Legal and institutional framework. The Constitution (1986) and the Decent Work Act, 2015 form the basis of labor law: the Act regulates employment contracts, hours, wages, leave, OHS, non-discrimination, freedom of association, child and forced labor and dispute resolution. Children's work is governed by the Children's Law, 2011 and the Hazardous and Light Work Lists, 2022 (approved, pending gazetting); the Revised Act to Ban Trafficking in Persons, 2021 criminalizes labor and sex trafficking. The MoL enforces labor law through its labor inspectorate and Department of Occupational Health and Safety; the EPA monitors workplace conditions through ESIA/ESMP compliance; and the MGCSP and the LNP Women and Children Protection Section handle child protection and GBV cases. Liberia has ratified ILO Conventions C029 (1931), C087 and C098 (1962), C182 (2003) and C100 and C138 (2022; general minimum age 15, light work 13, hazardous work 18), the Convention on the Rights of the Child (1993), the African Charter on the Rights and Welfare of the Child and the Palermo Protocol on trafficking (2004). It has not ratified C155 (Occupational Safety and Health).

Table 11 – ESS2 requirements, Liberia's system and measures applied by the project

ESS2 requirement	Liberian law and system strengths	Gaps relative to ESS2	Measures applied by the project
1. Legal framework	Constitution and DWA provide for non-discrimination, freedom of association (private sector), prohibition of forced labor and OHS; key ILO conventions ratified	Civil servants excluded from DWA collective rights; no national SEA/SH codes of conduct; light work allowed from 13 (ESS2: 14); hazardous list not yet gazetted	ESS2 applied to all project workers; minimum age 18 for all project work (Section 7); project Codes of Conduct (Annexes 2–3)
2. Institutional capacity	MoL labor inspectorate and OHS Department; EPA compliance monitoring	Understaffing and underfunding; limited reach outside Monrovia and in the informal sector; limited SEA/SH expertise	PIU Environmental Specialist and Social Safeguards and GBV Specialist (Section 5); PIU monitoring; coordination with MoL and EPA; budget under Component 5
3. Labor management procedures	General labor law sets employer obligations	No requirement for project-specific LMPs	This LMP; contractors' C-LMPs approved before works (ESCP 1.1.8)
4. Terms of employment	Written contracts required for formal employees	Casual workers often have no written terms	Written contracts for all workers, including casual workers (Section 8)
5. Occupational health and safety	OHS mandated by the DWA; MoL OHS inspections	Weak, irregular enforcement; few safety audits or medical checks	OHS Management Plan (ESCP 2.2), contractors' OHS plans, WBG EHS Guidelines, PIU inspections, incident reporting (ESCP E)
6. Non-discrimination and SEA/SH	DWA prohibits discrimination and promotes equal opportunity	Inconsistent enforcement; SEA/SH prevention and response not operationalized	Workplace policies (Annex 6); SEA/SH Action Plan (ESCP 1.1.7); Codes of Conduct; confidential SEA/SH pathway
7. Vulnerable workers	DWA protections for women (maternity) and children	No tailored protections for migrant workers or persons with disabilities	ESS2 protections, reasonable accommodation and equal terms for migrant workers (Section 8)

ESS2 requirement	Liberian law and system strengths	Gaps relative to ESS2	Measures applied by the project
8. Child labor	Children's Law prohibits hazardous work under 18; C138 and C182 ratified	Light work from 13; weak enforcement; no risk assessment for workers under 18	Minimum age 18 for all project work; age verification and remediation (Section 7)
9. Forced labor	Prohibited by the DWA and the Trafficking Act, 2021	Implementation gaps in the informal sector	No retention of documents, no recruitment fees, worker grievance mechanism (Sections 8–10)
10. Primary supply	General labor protections apply	No duty to assess labor risks at suppliers	Screening and monitoring of primary suppliers (Section 12)
11. Worker grievance mechanism	Labor courts and MoL complaints procedures	Centralized, costly and slow; weak confidentiality; no whistleblower protection	Two-tier worker grievance mechanism before workers are engaged (ESCP 2.3; Section 9; Annex 12)
12. Monitoring and enforcement	Inspections in the formal sector	Low coverage of high-risk and informal work; weak coordination	LMP indicators (Table 9), quarterly reporting (ESCP C) and training (ESCP B)

Annex 2: Code of Conduct for Contracted Companies

This Code has been modified for the purpose of this LMP from the Contractor's Code of Conduct in Annex 15 of the ESMF (December 2025), in line with ESS2, the World Bank Good Practice Note on addressing SEA/SH in investment project financing involving major civil works, and the project-specific requirements of this LMP. It must be signed by every contractor, subcontractor, consulting firm, primary supplier and service provider on WARDIP SOP II–Liberia before mobilization, and attached to its contract with the MoPT.

[Company name] acknowledges that complying with environmental, social, health and safety (ESHS) standards and the project's occupational health and safety (OHS) requirements, and preventing sexual exploitation and abuse and sexual harassment (SEA/SH) and violence against children (VAC), is important. All forms of SEA/SH and VAC are unacceptable, whether at the worksite, its surroundings, worker accommodation or the surrounding communities. Failure to follow ESHS and OHS standards, or engaging in SEA/SH or VAC, is gross misconduct and grounds for sanctions, penalties or termination of employment, and may be referred to the police for prosecution.

[Company name] commits, for all its workers, subcontractors and representatives on the project, to:

1. **Legal compliance.** Comply with the Decent Work Act, 2015, the Children's Law, 2011 and other Liberian law, ESS2 and this LMP, and implement a C-LMP, C-ESMP and OHS plan approved by the PIU.
2. **Non-discrimination.** Recruit, pay, promote and dismiss on merit, without discrimination on grounds of race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status, and make reasonable accommodation for workers with disabilities.
3. **Fair hiring and terms.** Publicize vacancies, charge no recruitment fees, give every worker a written contract in a language they understand, pay at least the legal minimum wage in full and on time, and respect legal working hours, overtime, rest and leave.
4. **Occupational health and safety.** Identify hazards before work, apply the hierarchy of controls, provide training and PPE free of charge and require its correct use, maintain emergency arrangements, report injuries, unsafe conditions and damage to the PIU immediately, and allow workers to leave imminently dangerous work without retaliation.
5. **Child labor.** Employ no one under 18 on the project (the project minimum age is 18 for all work) and, in primary supply operations, no one under 18 in hazardous work; verify and record every worker's age; report and remediate any case (Section 7).
6. **Forced labor and trafficking.** Use no forced, bonded or trafficked labor; never retain workers' identity documents; use only lawful recruiters; provide return travel to migrant workers.
7. **SEA/SH and VAC.** Apply zero tolerance; train all workers at induction and regularly on SEA/SH, VAC and HIV/AIDS; require every worker to sign the Code of Conduct for Employees (Annex 3); prohibit sexual activity with anyone under 18 and the exchange of money, employment, goods, services or other benefits for sex; enable confidential, survivor-centered reporting; take disciplinary action; and cooperate with investigations.
8. **Freedom of association.** Respect workers' right to join or not to join workers' organizations and to bargain collectively, without retaliation.
9. **Grievances.** Operate a worker grievance mechanism (Annex 12), inform all workers of it, and protect complainants and whistleblowers from retaliation.
10. **Community relations.** Require respectful conduct towards local communities, including fishing communities at Big Fanti Town, safe driving and health awareness.
11. **Alcohol and drugs.** Ensure that no one works while under the influence of alcohol or illegal drugs, or of prescription drugs that impair their ability to work safely.
12. **Workplace violence.** Tolerate no acts or threats of physical violence, intimidation or harassment.
13. **Environment.** Comply with applicable environmental laws and regulations and the C-ESMP, and minimize the environmental impact of the works, including through proper management of waste and e-waste.
14. **Ethics and anti-corruption.** Apply the highest standards of ethical conduct with the MoPT, the PIU, workers and the public; engage in no bribery, extortion, embezzlement, fraud or other corrupt practice; and recruit and compete fairly.

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15. **Confidentiality.** Protect confidential project information and the personal data of workers, complainants and SEA/SH survivors, during and after the contract.
16. **Records and reporting.** Keep an employer register, submit monthly E&S reports, and give the PIU and the World Bank access to sites, workers and records.
17. **Subcontractors and suppliers.** Apply this Code to all subcontractors and screen primary suppliers.

Breaches may lead to corrective action, withholding of payment, suspension or termination of the contract. This Code does not change the obligations set out in the contract with the MoPT; in the event of any conflict, the contract prevails.

Company	
Name and position of authorized representative	
Signature and date	

Annex 3: Code of Conduct for Employees

This Code has been modified for the purpose of this LMP from the Individual Code of Conduct in Annex 16 of the ESMF (December 2025), in line with ESS2 and the project-specific requirements. It will be signed by everyone engaged by the project – PIU staff, consultants and seconded staff, and the workers of contractors, subcontractors, consultants, service providers and primary suppliers – and signing is mandatory. It is signed at engagement, after it has been explained in a language the worker understands, and kept in the employer register (for PIU staff, in the personnel file).

I, _____, acknowledge that complying with environmental, social, health and safety (ESHS) standards and the project's occupational health and safety (OHS) requirements, and preventing sexual exploitation and abuse and sexual harassment (SEA/SH) and violence against children (VAC), is important. All forms of SEA/SH and VAC are unacceptable, whether at the worksite, its surroundings, worker accommodation or the surrounding communities. Failure to follow ESHS and OHS standards, or engaging in SEA/SH or VAC, is gross misconduct and grounds for sanctions, penalties or termination of employment, and may be referred to the police for prosecution.

My rights. You have the right to: fair and equal treatment; a written contract, regular and full pay and legal working hours; a safe workplace, training and free PPE, and to leave work you reasonably believe is imminently dangerous; join or not join a workers' organization; raise grievances without retaliation; and freedom from forced labor, child labor and trafficking.

I agree that while working on the project I will:

a) attend and take part in training on ESHS, OHS, HIV/AIDS and other communicable diseases, SEA/SH and VAC as required by my employer;
b) wear my personal protective equipment (PPE) correctly at all times at the worksite or when engaged in project activities;
c) take all practical steps to implement the C-ESMP and the OHS Management Plan, and stop work and report any situation I reasonably believe is imminently dangerous;
d) not work under the influence of alcohol, and not use illegal substances at any time;
e) consent to a police background check where my employer requires one and the law permits it;
f) treat women, children (persons under 18) and men with respect, regardless of race, colour, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status;
g) not use language or behaviour towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
h) not engage in sexual activity with anyone under 18, including grooming or contact through digital media; mistaken belief about a child's age, and consent from the child, are not a defence;
i) not engage in sexual harassment – unwelcome sexual advances, requests for sexual favours or other verbal or physical conduct of a sexual nature, including subtle acts such as looking someone up and down, sexual sounds, whistling and catcalls, unwanted personal gifts or comments about someone's sex life;

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j) not engage in sexual exploitation – making promises or favourable treatment dependent on sexual acts, or exchanging money, employment, goods, services or any other benefit for sex – or other humiliating, degrading or exploitative behaviour;
k) not have sexual interactions with members of the surrounding communities unless there is full consent by all parties; relationships involving the withholding, promise or provision of any benefit in exchange for sex are considered non-consensual under this Code;
l) report any suspected or actual SEA/SH or VAC by a fellow worker, whether employed by my employer or not, or any breach of this Code, through the worker grievance mechanism (Annex 12), the project grievance mechanism or to my manager, and not retaliate against anyone who reports;
m) drive safely and respect traffic rules, local laws and customs;
n) not engage in violence, threats or intimidation, or in bribery, fraud or other corrupt practices; and
o) protect project property and confidential information, including the personal data of complainants and survivors.

With regard to children (persons under 18), I will:

a) wherever possible, ensure that another adult is present when working near children;
b) not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger;
c) not sleep close to unsupervised children unless absolutely necessary, in which case I will obtain my supervisor's permission and ensure that another adult is present if possible;
d) use computers, mobile phones and video and digital cameras appropriately, and never to exploit or harass children or to access child sexual abuse material through any medium;
e) refrain from physical punishment or discipline of children; and
f) not hire children for domestic or other labour that is inappropriate for their age or development, interferes with their education or recreation, or places them at risk of injury, and comply with the Children's Law, 2011, the Decent Work Act, 2015 and the project minimum age of 18 for hazardous work.

Use of children's images for work-related purposes (for example, awareness campaigns and digital skills activities). Before photographing or filming a child, I will:

a) respect local traditions or restrictions on reproducing personal images;
b) obtain informed consent from the child and a parent or guardian, and explain how the image will be used;
c) ensure that images present children in a dignified and respectful manner, adequately clothed and not in poses that could be seen as sexually suggestive, and are honest representations of the context; and
d) ensure that file labels and captions do not reveal identifying information about a child.

Consent. Consent is the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. There is no consent where acceptance or agreement is obtained through threats, force or other forms of coercion, abduction, fraud, deception or misrepresentation. In line with the United Nations Convention on the Rights of the Child, the World Bank considers that children under 18 cannot give consent, even where national law sets a lower age.

Sanctions. I understand that if I breach this Code, my employer will take disciplinary action, in line with the Decent Work Act, 2015 and its disciplinary procedure, which may include:

a) an informal or formal warning;
b) additional training;
c) loss of pay, only where permitted by law;
d) suspension of employment;
e) termination of employment; and
f) referral to the police or other authorities where appropriate.

I understand that it is my responsibility to meet the ESHS and OHS standards and to avoid any action or behaviour that could be construed as SEA/SH or VAC. I have read this Code, agree to comply with it and understand my role in

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preventing and responding to ESHS, OHS, SEA/SH and VAC issues. I understand that any action inconsistent with this Code, or failure to take action required by it, may result in disciplinary action and may affect my employment.

Name	
Title / position	
Employer (PIU, contractor, subcontractor or other)	
Signature	
Date	

Annex 4: Parental Authorization for Light Work by Children Aged 14–15

Not applicable. The project minimum age is 18 years for all project work (Section 7), so no child will be engaged in light work on WARDIP SOP II–Liberia. If this changes, the LMP will be updated and the authorization form in the LMP Template added.

Annex 5: Parental Authorization for the Employment of a Child Aged 15–17

Not applicable. The project minimum age is 18 years for all project work (Section 7), so no child aged 15–17 will be employed on WARDIP SOP II–Liberia. If this changes, the LMP will be updated with World Bank agreement and the authorization form in the LMP Template added.

Annex 6: Workplace Policies and Procedures

The MoPT/PIU will require contractors and third parties to apply the following policies and procedures, and will monitor their application using the responsibilities, frequencies and evidence below and the indicators in Table 9 (Section 10.1). Non-compliance will trigger time-bound corrective action and, where warranted, contractual remedies (Section 10).

Policy	Commitment	Key procedures
Non-discrimination and equal opportunity	Decisions on recruitment, pay, conditions, training, promotion and dismissal are based on merit, with dignity and respect for all and protection of vulnerable workers.	• Equal-opportunity statements in vacancies; women and persons with disabilities encouraged to apply • Equal pay for work of equal value; reasonable accommodation • Training of supervisors; grievance access with provisions for sensitive cases • **Monitoring:** contractor HR officer reports workforce by sex, age and origin monthly; PIU Social and GBV Specialist reviews recruitment and pay records quarterly (Table 9).

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Policy	Commitment	Key procedures
Occupational health and safety	A safe and healthy workplace for all workers, in line with ESS2, the DWA and the WBG EHS Guidelines.	• Hazard identification before work; hierarchy of controls; PPE free of charge • Named OHS officer; inspections; training and toolbox talks • Recording and reporting of accidents, diseases and incidents; emergency preparedness and response; remedies for injury, disability and death • **Monitoring:** contractor HSE officer reports incidents and lost-time injuries monthly; PIU Environmental Specialist and supervision consultant inspect each site at least monthly; target: zero fatalities and serious incidents notified within ESCP timeframes (Table 9).
Freedom of association	Workers may form and join workers' organizations and bargain collectively without interference.	• No discrimination or retaliation against workers who participate • Workers' representatives on site grievance committees • **Monitoring:** PIU Social and GBV Specialist checks committee membership and any retaliation grievances quarterly, through grievance records and confidential worker interviews (Table 9).
Prevention of SEA/SH	Zero tolerance of sexual exploitation, abuse and harassment.	• Signed Codes of Conduct; induction and refresher training • Confidential reporting through any entry point; survivor-centered referral; no mediation • Disciplinary action; alignment with the SEA/SH Action Plan • **Monitoring:** 100% of workers sign the Code of Conduct and are inducted before starting work; PIU Social and GBV Specialist verifies signed Codes and training records monthly; SEA/SH cases reported in aggregate only (Table 9).
Prevention of child labor	No child labor; minimum age 18 for all project work.	• Age and identity verified for every worker (document or two-source triangulation) • Employer register with dates of birth; list of tasks prohibited under 18 (Hazardous and Light Work Lists, 2022) • Immediate removal, payment and referral of any child found working (Section 7) • **Monitoring:** 100% of workers age-verified before engagement; contractor HR officer reconciles the register monthly; PIU spot checks and unannounced visits (Table 9).

Policy	Commitment	Key procedures
Prevention of forced labor	All work is voluntary, with written terms.	• No retention of identity documents, no recruitment fees, no debt bondage • Only lawful recruiters; return travel for migrant workers • Workers free to resign with notice; violations reported and remediated • **Monitoring:** PIU Social and GBV Specialist checks document retention, recruitment fees and wage payments through payroll reviews and confidential worker interviews at least quarterly (Table 9).
Transparent and fair hiring	Recruitment is open, merit-based and free of gatekeeping.	• Vacancies advertised at least two weeks on company, MoPT and community notice boards, local radio and newspapers in Buchanan and Monrovia • Local recruitment publicized with county and city authorities, with priority to the project communities, meeting the local-recruitment targets in Table 9 • Written contract covering the employer, worker, job, place, duration, probation, notice, hours, rest, leave, pay and deductions, overtime, accommodation (if any), social protection, the grievance mechanism and the Code of Conduct • **Monitoring:** contractor and PIU Procurement Specialist report local hiring by sex quarterly against any contract requirement (Table 9).
Transparent worker documentation	Employment records are complete, accurate and accessible to workers.	• Employer register at each workplace (name, date of birth, job title and description, reporting line, contract dates) • Records available to the PIU and the World Bank on request • **Monitoring:** contractor HR officer reconciles the employer register with contracts and payroll monthly; verified by the PIU in each quarterly review (Table 9).

Annex 7: Worker Grievance Submission Form and Grievance Redress Record

Available at every workplace and from the PIU; may be submitted in writing, verbally or anonymously. Help will be given to fill it in.

Part A – Worker Grievance Submission Form (completed by or for the worker)

Company / worksite	
Name and contact (optional)	☐ I wish to remain anonymous ☐ Preferred contact: phone / e-mail / in person
Complaint made on behalf of	☐ Myself ☐ Another worker (name, optional): _____

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Type of grievance	☐ Workplace issue (conflict, schedules, tools, minor administrative issue) ☐ Labor rights or safety concern (unfair treatment, non-sexual harassment, unsafe conditions, pay or contract dispute) ☐ Serious violation (sexual exploitation, abuse or harassment; discrimination; forced or child labor; trafficking; serious safety risk, injury or death; retaliation)
Description (what, when, where, who)	
Resolution requested	
Signature and date (optional)	
For grievance mechanism use only	
Case number; received by; date	
Severity	☐ Light ☐ Moderate ☐ Severe (refer within 24 hours; SEA/SH to the Social and GBV Specialist)

Part B – Grievance Redress Record, WARDIP SOP II–Liberia (completed by the grievance focal person, site grievance committee or PIU Social and GBV Specialist)

Opened for every grievance received through any entry point, kept with the case file and summarized in the PIU central grievance record. It records how the grievance was received, the investigation and its outcome.

Grievance number (PIU central grievance record)	
Employer and worksite	☐ PIU (MoPT) ☐ Contractor ☐ Subcontractor ☐ Supervision consultant ☐ Other Name and location: _____
1. Date grievance was received	
2. How the grievance was received	☐ Written (Annex 7, Part A) ☐ Verbal, in person ☐ Through the site grievance focal person or committee ☐ Suggestion box ☐ Telephone, SMS or WhatsApp ☐ Anonymous ☐ Other (specify): _____
3. Name of complainant (optional; leave blank if anonymous)	
4. Telephone number of complainant (optional)	
5. Job title and work location of complainant	
6. Sex of complainant	☐ Male ☐ Female ☐ Prefer not to say
7. Worker category	☐ Direct worker (PIU staff or consultant) ☐ Contracted worker ☐ Subcontractor's worker ☐ Primary supply worker ☐ Community worker

8. Workers' representative or other person present (name and role)	
9. Nature of grievance (tick all that apply)	☐ Pay, overtime or deductions ☐ Contract, working hours or leave ☐ Occupational health and safety, injury or accident ☐ Unfair treatment or discrimination ☐ Non-sexual harassment or bullying ☐ Sexual exploitation, abuse or harassment (SEA/SH) – refer to the PIU Social and GBV Specialist within 24 hours; never mediated ☐ Child labor, forced labor or trafficking ☐ Retaliation for raising a concern ☐ Accommodation, food, water or sanitation ☐ Other (specify): _____
10. Severity (Annex 12)	☐ Light ☐ Moderate ☐ Severe (refer within 24 hours)
11. Summary of discussion with the complainant	
12. Date investigation started	
13. Was the complainant present?	☐ Yes ☐ No
14. Was site verification conducted?	☐ Yes ☐ No ☐ Not applicable
15. Findings of site verification or investigation	
16. Summary of decision taken	
17. Was agreement reached?	☐ Yes ☐ No
18. If yes, details of the agreement and the corrective action plan (Annex 8)	
19. If no, details of the disagreement and where the case was escalated or referred	☐ Higher tier (PIU) ☐ MoL / National Labor Commission ☐ Courts ☐ World Bank GRS Details: _____
20. Other issues raised, if any	
21. Signed: investigator (site grievance focal person or committee, or PIU Social and GBV Specialist)	Name, signature and date:
22. Signed: complainant (optional)	Name, signature and date:

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23. Signed: workers' representative or independent witness	Name, signature and date:
24. Date investigation concluded (close the case using Annex 9)	

Confidentiality: for SEA/SH cases, do not record the survivor's name, contact details or details of the incident on this form. Record only the case number, date and referral, and keep case details in the restricted register held by the PIU Social and GBV Specialist (Annex 12). Information on all cases is shared only on a need-to-know basis.

Annex 8: Worker Grievance Corrective Action Plan Form

Case number; date; grievance officer	
Category and severity	
Findings of the assessment	
Agreed resolution	☐ Mediation (not for SEA/SH) ☐ Disciplinary action ☐ Workplace improvement ☐ Compensation or payment due ☐ Referral ☐ Other
Actions, responsible person and deadline	1. 2.
Follow-up and review date	
Approved by (name, signature, date)	

Annex 9: Grievance Case Closure Form

Case number; date received; date closed	
Resolution implemented and date	
Outcome	☐ Resolved ☐ Partially resolved ☐ Unresolved (referred to: _____)
Complainant satisfied?	☐ Yes ☐ No ☐ Partially
Further action	☐ None ☐ Monitoring ☐ Further intervention
Closed by (name, signature, date)	

Annex 10: Worker Satisfaction Feedback Form

Case number; date of closure	
Satisfaction with the resolution	☐ Very satisfied ☐ Satisfied ☐ Neutral ☐ Dissatisfied ☐ Very dissatisfied
Were your concerns addressed?	☐ Completely ☐ Partially ☐ Not at all
Treated with respect? Free from retaliation?	☐ Yes ☐ No ☐ Yes ☐ No
Rating of the process	☐ Excellent ☐ Good ☐ Average ☐ Poor
Suggestions for improvement	

Annex 11: Health and Safety Hazards and Mitigation Measures

Controls follow the hierarchy of controls (Section 3) and will be detailed in the site-specific ESIA/ESMP, the OHS Management Plan (ESCP 2.2), the Emergency Preparedness and Response Plan and contractors' OHS plans, in line with the WBG General and Telecommunications EHS Guidelines.

Hazard	Where it arises on the project	Key controls
Excavation and trenching	Beach manhole, duct and CLS foundations	Shoring, trench boxes or battering of trench walls as required by depth and soil; edge barriers; spoil set back; daily inspection; safe access and egress
Machinery, vehicles and traffic	Excavators, trucks, cranes; Monrovia–Buchanan travel	Certified operators; banksmen; segregated routes and exclusion zones; speed limits; journey management; high-visibility clothing
Work at height and lifting	CLS building, racks, towers, vessel deck	Scaffolds and platforms inspected before use; guardrails, then harnesses and rescue plan; lifting plans; certified rigging; no work under suspended loads
Electrical hazards	Buried and overhead utilities; CLS power and equipment	Utility locating before digging; lock-out/tag-out and permits to work; competent electricians; insulated tools; earthing and residual-current devices
Marine and diving operations	Cable-laying vessel, shore-end pull, nearshore diving	Approved marine and dive safety plan; dive supervisor and standby diver; weather limits; life jackets; man-overboard and medical evacuation arrangements
Confined spaces	Beach manhole, vaults, duct chambers	Entry permits; gas testing; forced ventilation; trained entrants with attendant and rescue plan
Optical fiber, laser and radio-frequency/electromagnetic fields (RF/EMF)	Splicing, testing, live fibers, antennas	Never view live fibers; sealed containers for fiber offcuts; safety glasses; power-down before entering RF exclusion zones; exposure within International Commission on Non-Ionizing Radiation Protection (ICNIRP) limits
Manual handling and ergonomics	Cable drums, ducts, materials; SOC workstations	Mechanical aids; team lifts; training; job rotation; ergonomic workstations
Heat stress, noise, dust and vibration	Outdoor works; power tools; generators	Shade, water and rest breaks; work scheduling; dust suppression; hearing protection; low-vibration tools
Hazardous substances and fire	Fuel, oils, cement, solvents, batteries, e-waste	Safety data sheets; bunded storage; ventilation; gloves, goggles, respirators; fire extinguishers and drills; e-waste procedures (ESCP 1.1.9)
Biological and communicable diseases	Malaria, waterborne diseases, HIV and other infections	Drinking water, toilets and handwashing; removal of standing water; health awareness; first aid and referral to health facilities
Fatigue, lone work and psychosocial risks	Long shifts, offshore rotations, SOC night work, CLS technicians	Rosters within legal hours and rest; lone-working check-in; fatigue management; confidential support
Emergencies	Storms, flooding, fire, medical emergencies, marine incidents	Emergency Preparedness and Response Plan; evacuation routes; trained first-aiders; drills; incident reporting (ESCP E)

Annex 12: Worker Grievance Mechanism

Purpose. The worker grievance mechanism allows workers to raise workplace concerns early and have them resolved fairly, through corrective action, mediation or settlement, or referred – with the complainant's informed consent – to external services such as the MoL, the courts, GBV service providers, the LNP Women and Children Protection Section

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or the MGCSP. It operates on the principles set out in Section 9. Collective or systemic concerns are referred to the project grievance mechanism (ESCP 10.2).

Structure. Interim lower tier (until contractors are mobilized): the existing project grievance mechanism in the SEP, adapted for workers and managed by the PIU; worker grievances are received through the SEP and worker entry points, handled by the PIU Social and GBV Specialist (or another designated officer if the complaint concerns the Specialist) separately from community grievances, and recorded in the Worker Grievance Register (Annex 16). Site lower tier (once contractors are mobilized, SEP Section 5.7): a site grievance committee at each worksite – a contractor representative, a representative of the supervising entity/team and a workers' representative chosen by the workers – supported by a grievance focal person in the contractor's HR department; for direct workers, the PIU Social and GBV Specialist. Higher tier: the PIU Social and GBV Specialist, with escalation to the Project Coordinator. Workers may use the statutory system (MoL, National Labor Commission, courts) or the World Bank GRS at any time.

Table 12 – Entry points

Telephone / toll-free line	To be established by the PIU and posted at all worksites before further workers are engaged (Table 10)
SMS / WhatsApp	To be established with the project grievance mechanism (ESCP 10.2) and posted at all worksites
Direct workers	PIU Social and GBV Specialist (Social Safeguards and GBV Specialist), WARDIP SOP II–Liberia PIU, MoPT, Carey and McDonald Streets, Monrovia; or the Project Coordinator if the complaint concerns the Specialist
Contracted workers	Contractor's site focal person (HR department) and suggestion boxes at each worksite; supervision consultant's E&S staff (contacts posted at mobilization)
Project GM (SEP)	Entry points of the project grievance mechanism described in the SEP, adapted for workers until contractors are mobilized; worker grievances are recorded separately in the Worker Grievance Register (Annex 16)
World Bank GRS	https://wbgcmsgrs.powerappsportals.com/en-US/new-complaint/ ; grievances@worldbank.org

Table 13 – Case typology and timelines (business days from receipt: Ack. = acknowledgement; Assess = preliminary assessment; Action = notification of action; Reply = response and resolution)

Category	Examples	Resolution approach	Ack.	Assess	Action	Reply
Light – minor workplace issue	Conflicts between colleagues; shift or schedule issues; tools or workspace; minor administrative delays	Direct dialogue; supervisor or HR intervention; quick administrative fix	2	5	10	20
Moderate – labor rights or safety concern	Unfair treatment; non-sexual harassment; unsafe conditions; pay, overtime or contract disputes	Formal investigation by HR or site committee; corrective action; mediation; escalation if unresolved	2	5	10	20
Severe – legal or ethical violation	SEA/SH; discrimination; forced or child labor; trafficking; serious safety risk, injury or death; retaliation	Higher-tier investigation; immediate protection of the complainant; referral to statutory services; disciplinary action or contract termination	24 hours	3	5	7

Procedure. (1) A worker submits a grievance through any entry point, in writing (Annex 7), verbally or anonymously. (2) The grievance is registered with a unique number in the PIU central grievance record (the computer-based Grievance Management System, ESMF Section 10.3; register format in Annex 16), classified by severity and

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acknowledged, and a Grievance Redress Record (Annex 7, Part B) is opened. (3) The case is assessed and the complainant contacted. (4) The proposed action is notified to the complainant, who may accept it or discuss alternatives. (5) The response is formulated and the corrective action plan (Annex 8) entered in the central record. (6) Corrective action is implemented and monitored; the case is closed with a closure form (Annex 9), and the complainant is offered a feedback form (Annex 10). Contractors submit their site grievance logs to the PIU monthly.

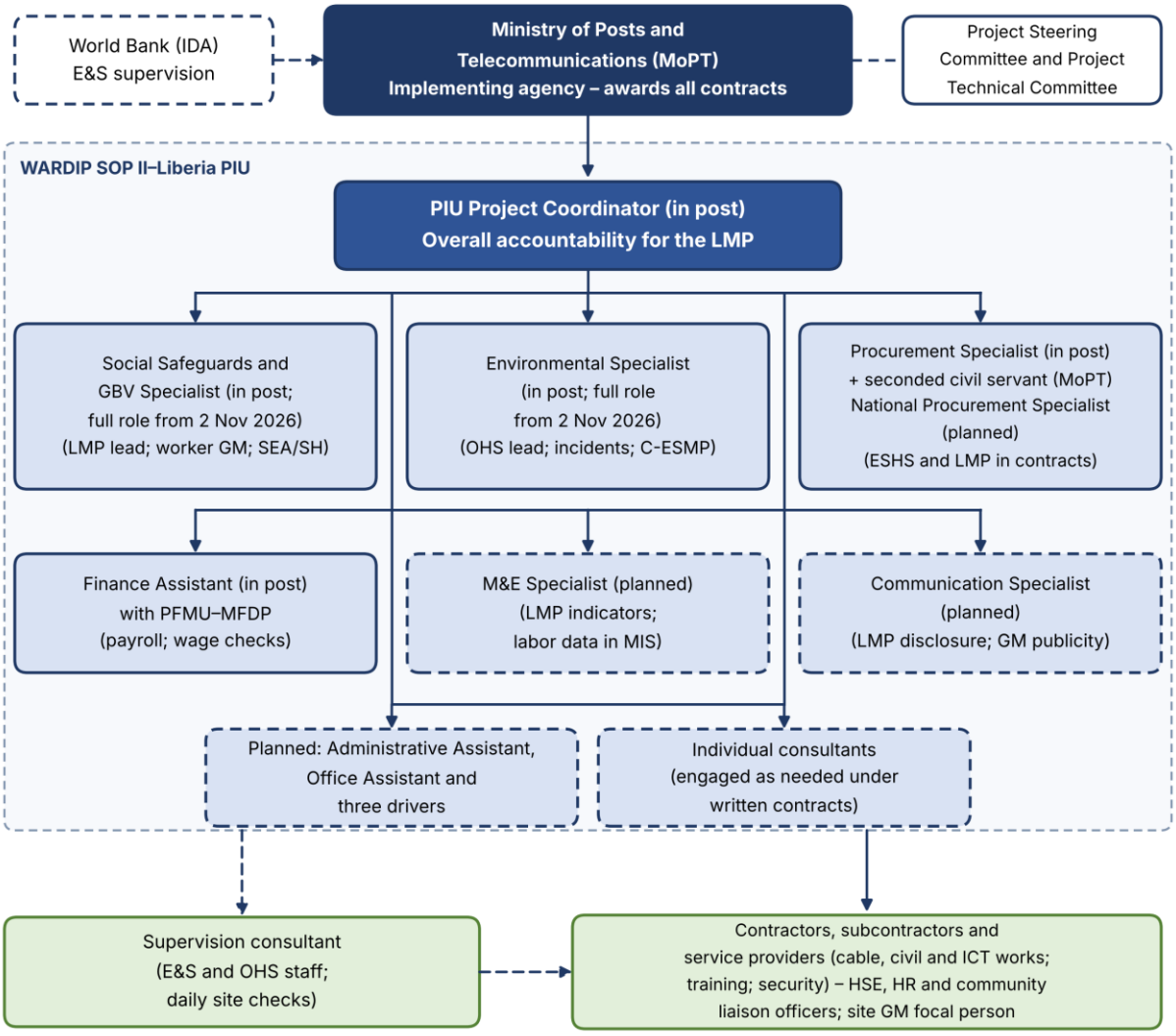
Severe and SEA/SH cases. In line with the SEA/SH, GBV and VAC grievance procedure in Section 5.9 of the SEP, SEA/SH complaints are received confidentially through any entry point, referred within 24 hours to the PIU Social and GBV Specialist, never mediated, and recorded in a separate restricted register. Survivors are referred, with informed consent, to the LNP Women and Children Protection Section or the MGCSP and, once mapped under the SEA/SH Action Plan (ESCP 1.1.7), to GBV service providers. Cases involving children require the involvement of the MGCSP and/or the police under the Children's Law, 2011. The World Bank is notified within 24 hours of fatalities and SEA/SH incidents and within 48 hours of other serious incidents (ESCP E). The project will fund remediation as defined by statutory agencies or courts until each case is closed.

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Annex 13: Organogram

The PIU and LMP implementation arrangements are shown in the indicative organogram below, based on the PAD, ESCP and ESMF and the PIU positions reported by the PIU in October 2026. It will be updated to match the approved PIU staffing plan.

Figure 1 – Indicative organogram for LMP implementation



Dashed boxes: planned positions (recruitment from December 2026; all filled by March 2027). Solid lines: line management or contract; dashed lines: coordination, oversight or reporting.

The figure shows the PIU positions and their status: in post – the Project Coordinator, Finance Assistant and Procurement Specialist (with a seconded civil servant); joined in October 2026 and in full role since 2 November 2026 – the Environmental Specialist and the Social Safeguards and GBV Specialist; planned (recruitment from December 2026; all filled by March 2027) – the Communication Specialist, M&E Specialist, National Procurement Specialist, Administrative Assistant, Office Assistant and three drivers; individual consultants are engaged as needed. Planned positions have dashed outlines. The figure will be updated when the PIU staffing plan and organogram are approved (January 2027); the organogram will be fully operational by March 2027.

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Annex 14: Incident Reporting Procedure and Form

This annex adapts the incident and accident reporting procedure in Section 9 of the ESMF and the Incident Reporting Form and Types of Incidents to be Reported in Annex 14 of the ESMF (December 2025) for project workers and worksites, in line with ESCP action E and the World Bank Environmental and Social Incident Response Toolkit (ESIRT). It applies to the PIU, contractors, subcontractors, consultants and service providers. SEA/SH incidents are reported only through the SEA/SH Incident Reporting Format (Annex 15).

A. Reporting procedure and timelines

No.	Action	Responsible	Timeline
1	Make the site safe; give first aid and arrange medical care or evacuation; stop work where danger continues; preserve the scene; protect affected persons.	Contractor site supervisor and HSE officer	Immediately
2	Notify the PIU Environmental Specialist (and the Social and GBV Specialist for SEA/SH, child labor, forced labor or worker-community incidents) and the supervision consultant by telephone and e-mail.	Contractor HSE officer	Immediately; no later than 24 hours
3	Submit the Incident Reporting Form (Part C), attaching any written reports and photographs.	Contractor; verified by supervision consultant	Within 24 hours
4	Classify the incident as indicative, serious or severe (Part B).	PIU Environmental Specialist / Social and GBV Specialist	On receipt
5	Notify the World Bank of serious and severe incidents, by any electronic means, stating their nature, circumstances and likely effects.	PIU Project Coordinator	Within 48 hours of the PIU becoming aware; within 24 hours for fatalities, severe injuries and SEA/SH
6	Notify national authorities as required: MoL (workplace accidents and labor violations), EPA (environmental incidents), LNP (criminal matters) and MGCSP (cases involving children).	PIU / contractor	As required by law
7	Investigate and submit a detailed incident report with root-cause analysis and a Corrective Action Plan covering: (i) immediate measures where danger continues (e.g., fencing, signboards, guards); (ii) compensation to the worker or affected family on a clear rationale and as required by law; (iii) review of the risk assessment and of the application of ESHS procedures; and (iv) medium- and long-term measures, including improved safety measures, audits and training.	Contractor, with the PIU and supervision consultant	Within 10 days (ESCP E)
8	Implement the Corrective Action Plan, keep the World Bank informed of progress and close out the incident.	Contractor; monitored by the PIU	As set in the plan
9	Record all incidents, including indicative incidents and near misses, in the site accident logbook and the PIU incident register, and report them in contractors' monthly reports and the PIU's quarterly E&S reports.	Contractor; PIU	Monthly / quarterly

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B. Classification of incidents (examples relevant to project workers and worksites)

Indicative	Serious	Severe
• Minor job-site injuries (first aid only) and near misses • Under-use of PPE • Poor housekeeping; multiple slip and trip hazards • Missing or nearly empty first-aid kits • Irregular OHS induction and toolbox talks • Missing warning or traffic-control signage • Minor delays in pay or gaps in worker records • Nuisance-level conflict between workers and the community • Small fuel or chemical spills; localized dust or noise	• Injury requiring off-site medical attention or lost time • Serious communicable disease among the workforce • Consistent lack of OHS plans or training; chronic non-use of PPE • Repeated non-compliance or failure to remedy it • Diving, vessel, lifting or electrical incident without serious injury • Workers without written contracts, or systematic under-payment • Sexual harassment of workers, or mistreatment of community members by workers or security personnel • Worker protests or strikes affecting the works • Large spills of fuel or chemicals affecting the environment	• Fatality or permanent disability of a worker or community member • Any SEA/SH incident (always notified within 24 hours) • Child labor, forced labor or human trafficking • Outbreak of a life-threatening communicable disease • Major marine incident (e.g., vessel collision or diving fatality) • Assault, kidnapping or other criminal attack at a worksite (referred to the authorities; World Bank security notified) • Contractor unresponsive to ongoing risk of bodily injury, or persistent non-compliance that could cause injury • Abuse of community members by security personnel or workers • Violent protests against the project

C. Incident Reporting Form

Note: incidents of child abuse, sexual harassment and severe criminality or social risks that may involve project staff must be documented and brought to the attention of the PIU, which will decide whether further investigation is needed.

1. From (name)	
2. Title and organization	
3. To (name, title and organization)	PIU Environmental Specialist, WARDIP SOP II–Liberia PIU, MoPT
4. Date of submission / re-submission	
5. Incident number	e.g., WARDIP-[contractor]-[year]-[month]-[no.]
6. Type of incident	☐ Occupational health and safety ☐ Labor and working conditions ☐ Environmental ☐ Community health and safety ☐ Security ☐ Other (specify): _____ (SEA/SH: use Annex 15)
7. Nature of incident	e.g., fall from height, trench collapse, electric shock, diving accident, road traffic accident
8. Classification (Part B)	☐ Indicative ☐ Serious ☐ Severe
9. Who was affected? (number and sex; no names)	☐ Direct worker ☐ Contracted worker ☐ Subcontractor's worker ☐ Community member ☐ Other Number affected: ___ (female ___ / male ___)
10. Project staff involved or suspected to be involved (name and occupation, if known)	
11. Date and time the incident happened	

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12. Location (worksite and, where possible, GPS)	
13. Date and time reported to the contractor / consultant / PIU	
14. Reported by (name and role)	
15. To whom was the incident reported?	
16. Mode of reporting	☐ Verbal ☐ Written (attach) ☐ Telephone / SMS
17. Details of the incident (key facts and how it happened)	
18. Immediate actions taken (first aid, medical evacuation, work stopped, area made safe) and when	
19. Who else was informed?	☐ MoL ☐ EPA ☐ LNP ☐ MGCSP ☐ Health facility ☐ Family ☐ Other
20. Date and time the World Bank was notified (PIU)	
21. Corrective actions planned, responsible persons and deadlines; due date of the root-cause analysis and Corrective Action Plan	
22. Prepared by (name, signature, date)	
23. Reviewed by the PIU (name, signature, date)	

Annex 15: SEA/SH Incident Reporting Format

This format adapts the GBV/SEA/SH Reporting Format in Annex 17 of the ESMF. It is completed only by the PIU Social and GBV Specialist to notify the Project Coordinator and the World Bank, within 24 hours of the PIU becoming aware, of any SEA/SH allegation linked to the project (ESCP E). The approach is survivor-centered: information is shared only with the survivor's informed consent, and the survivor's access to services does not depend on reporting or on any investigation.

1. Case number (restricted SEA/SH register)	
2. Type of allegation	☐ Sexual exploitation ☐ Sexual abuse ☐ Sexual harassment ☐ Not specified
3. Nature of the incident (basic facts only, as reported: what happened, and whether the alleged perpetrator is linked to the project; do not ask for in-depth details)	
4. Age of survivor	☐ Adult ☐ Child (under 18) – refer to the MGCSP / LNP ☐ Unknown
5. Sex of survivor	☐ Female ☐ Male ☐ Not disclosed
6. Alleged perpetrator linked to the project as	☐ PIU staff or consultant ☐ Contractor or subcontractor worker ☐ Security personnel ☐ Other ☐ Unknown
7. Source of information	☐ Survivor ☐ Worker GM ☐ Project GM ☐ GBV service provider ☐ Other
8. Where the incident occurred (county and district only)	
9. When the incident occurred (month and year only)	
10. Referral to services offered and accepted	☐ Medical ☐ Psychosocial ☐ Legal ☐ LNP WACPS ☐ MGCSP ☐ Declined
11. Actions taken regarding the alleged perpetrator, if any (e.g., investigation, suspension)	
12. Date the PIU became aware / date the World Bank was notified	
13. Additional information (if available)	
14. Reported by (PIU Social and GBV Specialist: name, signature, date)	

The identity and safety of the survivor must be protected at all times. No personal data or identifying information about the survivor or the alleged perpetrator may be shared through this format. This includes names, dates of birth, home addresses, the exact time and place of the incident, visible disability and residence status that could identify a person in a small community. Completed formats are kept in the restricted SEA/SH register held by the PIU Social and GBV Specialist.

Annex 16: Worker Grievance Register (Log)

This register adapts the Grievance Register/Log in Annex 12 of the ESMF for worker grievances. Each contractor keeps a site register and the PIU keeps the central grievance record (Annex 12); until contractors are mobilized, the PIU register is used for all worker grievances under the interim arrangement adapted from the SEP grievance mechanism (Section 9). Each case is opened with a Grievance Redress Record (Annex 7, Part B). Registers are confidential. SEA/SH cases are entered only by case number, category and status; details are kept in the restricted register held by the PIU Social and GBV Specialist.

No.	Date received	Entry point	Employer / worker category	Sex (M/F/ –)	Category and severity	Summary of grievance	Date acknowledged	Investigation started / completed	Resolution and actions (Annex 8 ref.)	Status (open / referred / closed)	Date closed; satisfied? (Annex 9)

Entry points: written form (Annex 7), verbal, site focal person or committee, suggestion box, telephone/SMS/WhatsApp, anonymous. Severity: light, moderate or severe (Annex 12).

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